

# Part 5 - 3

## Codes and Protocols

### Anti-Fraud and Corruption Strategy

#### CONTENTS

	Page
<b>Anti-Fraud and Corruption Strategy</b>	
1. Introduction	5 - 3 - 1
2. Anti-Fraud and Corruption Framework	5 - 3 - 1
3. Culture	5 - 3 - 2
4. Prevention	5 - 3 - 2
5. Detection and Investigation	5 - 3 - 5
6. Training and Awareness	5 - 3 - 6
7. Conclusion and Review	5 - 3 - 6
<b>Fraud Response Plan</b>	
1. Introduction	5 - 3 - 8
2. Objectives and Scope	5 - 3 - 8
3. Definition of Fraud and Corruption	5 - 3 - 9
4. Types of Fraud and Corruption	5 - 3 - 9
5. What should an employee or Member do if they suspect fraud or corruption?	5 - 3 - 9
6. What should managers do when suspected fraud or corruption is reported to them by a member of staff?	5 - 3 - 10
7. What should auditors do if they suspect fraud or corruption?	5 - 3 - 11
8. What should a member of the public do if they suspect fraud or corruption?	5 - 3 - 11
9. Investigating Allegations of Irregularities	5 - 3 - 11
10. Preservation of Evidence	5 - 3 - 12
11. Actions Following the completion of an Investigation	5 - 3 - 12
12. Follow Up	5 - 3 - 13
13. Publicity	5 - 3 - 13
<b>Anti-Bribery Policy</b>	
1. Policy Statement	5 - 3 - 14
2. Objective of this policy	5 - 3 - 14
3. Scope of this policy	5 - 3 - 14
4. This Council's commitment to action	5 - 3 - 15
5. The Bribery Act 2010	5 - 3 - 15
6. Bribery is not tolerated	5 - 3 - 17
7. Facilitation payments	5 - 3 - 17

## **Anti-Bribery Policy (cont.....)**

8.	Gifts and hospitality	5 - 3 - 17
9.	Public contracts and bribery offences	5 - 3 - 17
10.	Staff responsibilities	5 - 3 - 18
11.	Raising a concern	5 - 3 - 18

## **Anti-Money Laundering Policy**

1.	Introduction	5 - 3 - 19
2.	Objectives and Scope	5 - 3 - 19
3.	What is money laundering?	5 - 3 - 19
4.	The Money Laundering Reporting Officer (MLRO)	5 - 3 - 21
5.	How do I know when money laundering is taking place?	5 - 3 - 21
6.	What should I do if I suspect a case of money laundering?	5 - 3 - 21
7.	What will the MLRO do?	5 - 3 - 22
8.	Customer Due Diligence	5 - 3 - 23
9.	Other Customer Checks	5 - 3 - 24
10.	Record keeping	5 - 3 - 24
11.	Guidance and training	5 - 3 - 24
12.	Conclusion	5 - 3 - 25

## **Whistleblowing Policy**

1.	Introduction	5 - 3 - 30
2.	Objectives and Scope	5 - 3 - 30
3.	Definition of whistleblowing	5 - 3 - 31
4.	Reportable Behaviour	5 - 3 - 31
5.	Safeguards	5 - 3 - 31
6.	How to Raise a Concern	5 - 3 - 32
7.	How the Council will Respond	5 - 3 - 33
8.	How the Matter Can Be Taken Further	5 - 3 - 34
9.	Independent Advice	5 - 3 - 34
10.	Relevant Legislation	5 - 3 - 35