

GWYNEDD COUNCIL

COMMITTEE	AUDIT COMMITTEE
DATE	29 JANUARY 2013
TITLE	GWYNEDD COUNCIL'S ANTI-FRAUD, ANTI-CORRUPTION AND ANTI-BRIBERY STRATEGY AND RESPONSE PLAN
PURPOSE OF REPORT	TO PRESENT ANTI-FRAUD AND ANTI-CORRUPTION STRATEGY AND FRAUD, BRIBERY AND CORRUPTION RESPONSE PLAN TO THE AUDIT COMMITTEE FOR APPROVAL
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ACTION	TO ADOPT THE STRATEGY AND PLAN AND DECLARE SUPPORT FOR THEIR CONTENTS

I. INTRODUCTION

- I.1 The previous Anti-Fraud and Anti-Corruption was adopted by the Audit Committee in June 2009. The Strategy superseded previous strategies that had been in place for many years.
- I.2 The previous strategy recognised that Gwynedd Council, like any other public organisation that deals with a substantial amount of money, could be subject to attempts to defraud or to influence officers and / or members in a corrupt manner. This can be undertaken or attempted by individuals from outside the Council, by staff, by members or by a combination of these conspiring with each other. As a result of the Bribery Act 2010, there is a need to update the Strategy in order to recognise the latest requirements.
- I.3 The Strategy forms a key part of the authority's governance framework, and its adoption, its promotion and its implementation are essential steps in gaining the confidence of the public with regards to protecting taxpayers' money. It reflects the Council's determination to protect itself from fraud and corruption and its intention is to ensure high standards of public accountability.
- I.4 The 2013-2016 Strategy contains an Action Plan to promote the document and the messages contained within it, so that the responsibilities contained therein are known to all relevant persons.
- I.5 These documents reflect the determination of the Council to protect itself from fraudulent and corrupt practices and its commitment to ensure high standards of public accountability.

2. ANTI-FRAUD AND ANTI-CORRUPTION STRATEGY

- 2.1 The purpose of the Anti-Fraud and Anti-Corruption Strategy is to provide an overview of the Council's policy towards fraud and corruption and those who perpetrate, or seek to perpetrate, fraud and corruption against Gwynedd Council and the taxpayer. It is designed to achieve the following:
- Explain what the Council means by fraud, bribery and corruption;
 - Set out the standards that the Council expects from its Elected Members and employees;
 - Encourage fraud prevention;
 - Promote fraud detection;
 - Show how the Council will investigate fraud, bribery and corruption;
 - Promote fraud awareness.
- 2.2 To ensure that the Strategy is effective in achieving its objectives, the Audit Committee will receive regular reports, every approximately 6 months, on the Council's anti-fraud, anti-bribery and anti-corruption efforts.

3. FRAUD AND CORRUPTION RESPONSE PLAN

- 3.1 The Fraud and Corruption Response Plan is to be read in conjunction with the Strategy, and sets out what staff and/or managers should do when they suspect that fraud or corruption is occurring, and the practical steps that the Council shall follow to deal with the matter. The document sets out what the following should do when discovering or suspecting fraud, bribery or corruption:
- Staff
 - Managers
 - Auditors
- 3.2 The plan has been developed to give due attention and consideration to a number of other policies and working practices within the Council in order to ensure consistency, including:
- The local conditions of service
 - Disclosure Policy ("Whistleblowing")
 - Disciplinary Policy
 - Financial Procedure Rules
 - Internal Audit Terms of Reference
- 3.3 The Response Plan explains how the Council will act in order to investigate allegations of fraud, bribery or corruption, including how this connects with the Authority's Disciplinary Policy.
- 3.4 The plan also outlines how the Council will act and the options which must be considered, when sufficient evidence has been collected to support the allegation of fraud, bribery or corruption, including internal discipline and/or criminal or civil prosecution, or a combination of these.

4. RECOMMENDATIONS

- 4.1 The Audit Committee is asked to approve the Anti-Fraud, Anti-Bribery and Anti-Corruption Strategy and the Fraud and Corruption Response Plan, and formally adopt them.
- 4.2 The Audit Committee is asked to express support to the documents and to support Council Members and officers in their implementation.