

REVIEW OF COUNTER FRAUD AND CORRUPTION POLICY

Summary: To present an updated Counter Fraud and Corruption Policy.

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Recommendation: That the Board adopts the updated Counter Fraud and Corruption Policy.

Key Issues

1. The Board's Counter Fraud and Corruption Policy had not been updated since 2009, until it was considered again by the Executive Committee in November 2019.
2. The opportunity has been taken to incorporate the most recent legislation, guidance and terminology.
3. The updated policy does not make substantive changes to any of the Board's systems or procedures. However, some of the wording and content has been rationalised, to reduce its length and complexity.

Background

4. The Board's Counter Fraud and Corruption Policy has been reviewed and updated by officers, to reflect the most recent sector guidance and legislation. The updated version is attached as Appendix A to this report.
5. The Policy sets out the Board's approach to:
 - Promoting high standards of honest and fair conduct
 - Maintaining strong systems of internal control
 - Preventing fraud and corruption
 - Detecting fraud and corruption
 - Investigating concerns
 - Addressing disciplinary action, sanctions and prosecution
 - Strengthening any perceived weakness in control systems
 - Recovering any losses.
6. The Policy is complemented by the Board's Confidential Reporting Procedure, which was also considered at the November meeting of the Executive Committee.

Supporting Paper:

Appendix A – Counter Fraud and Corruption Policy