

REVIEW OF COUNTER FRAUD AND CORRUPTION POLICY

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

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Recommendation: That the Committee recommends the updated Counter Fraud and Corruption Policy to the Board.

Key Issues

1. The Board's Counter Fraud and Corruption Policy has not been updated since 2009.
2. Whilst there have been no specific issues to prompt a review at this stage, 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 is also on the agenda for the November meeting of the Executive Committee.

Supporting Paper:

Appendix A – Counter Fraud and Corruption Policy