


<p><b>London Borough of Hammersmith &amp; Fulham</b></p> <p><b>AUDIT AND PENSIONS COMMITTEE</b></p> <p><b>16 December 2019</b></p>		
<b>ANTI-FRAUD POLICY REVIEW</b>		
<b>Open Report</b>		
<b>Classification - For Decision</b> <b>Key Decision: No</b>		
<b>Consultation</b>		
<b>Wards Affected:</b> All		
<b>Accountable Director:</b> Hitesh Jolapara, Strategic Director of Finance and Governance		
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## 1. EXECUTIVE SUMMARY

1.1 In accordance with the terms of reference the Committee is responsible for the effective scrutiny of anti-fraud arrangements and activities, the Audit Pensions and Standards Committee:

- review and approve certain anti-fraud policies
- is responsible for gaining assurance that policies are kept up to date and are fit for purpose.

1.2 This paper contains three revised anti-fraud policies, reported in the appendices to this report, for review and approval. They are:

- Anti-Bribery Policy
- Anti-Money Laundering Policy
- Fraud Response Plan

1.3 There are no material changes.

## **2. RECOMMENDATIONS**

- 2.1 Note and approve the updated anti-fraud policies.

## **3. REASONS FOR DECISIONS**

- 3.1 To inform the Committee of policy revisions and to provide assurance that policies are kept up to date and are fit for purpose.

## **4. ANTI-FRAUD POLICIES**

- 4.1 Minimising any losses to fraud and corruption is an essential part of ensuring that all of the Council's resources are used for the purposes for which they are intended and ensuring we remain ruthlessly financially efficient.
- 4.2 Staff are often the first to spot possible cases of wrongdoing at an early stage and are therefore encouraged and, indeed, expected to raise any concern that they may have, without fear of recrimination. Any concerns raised will be treated in the strictest confidence and will be appropriately investigated.
- 4.3 It is therefore vitally important that anti-fraud policies are kept up to date to support and guide Council staff, ensuring compliance with laws and regulations, giving guidance for decision-making, and streamlining internal processes.
- 4.4 The table below details the key anti-fraud policies, their dates of revision and date of their next review.

<b>Policy</b>	<b>Last review</b>	<b>Next review</b>
Anti-Bribery Policy	December 2018	December 2019
Anti-Money Laundering Policy & Procedures	December 2018	December 2019
Fraud Response Plan	December 2018	December 2019
Anti-Fraud & Corruption Strategy 2016-2019	August 2016	January 2020
Fraud Risks: A Guide for Managers	February 2018	February 2020
Whistleblowing Policy	August 2017	Under review

## **5. OPTIONS AND ANALYSIS OF OPTIONS**

- 5.1 The Director of Audit, Fraud, Risk and Insurance is required to provide an annual report and opinion on the Council's system of internal control under the Public Sector Internal Audit Standards. This includes having appropriate arrangements for protecting, detecting and deterring fraud against the Council.

## **6. CONSULTATION**

- 6.1 The report has been subject to consultation with the Strategic Leadership Team.

## **7. EQUALITY IMPLICATIONS**

- 7.1 There are no equality implications arising from this report.

## **8. LEGAL IMPLICATIONS**

- 8.1 The work of CAFS is governed by a range of legislation including: the Police and Criminal Evidence Act, the Criminal Procedures Investigation Act, the Regulation of Investigatory Powers Act, the Fraud Act, the Prevention of Social Housing Fraud Act and the Proceeds of Crime Act.

## **9. FINANCIAL AND RESOURCES IMPLICATIONS**

- 9.1 Resources required to deliver on the Council's counter fraud strategy come from the budget allocated to the Corporate Anti-fraud Service. There are no additional resource implications arising from this report. Successful investigations and prosecutions can lead to the recovery of Council assets and money which are required to protect front line services.

## **10. RISK MANAGEMENT**

- 10.1 The delivery of the counter fraud strategy and associated policies contributes to the management of fraud risks faced by the Council, with proactive exercises supporting managers to put effective counter fraud and corruption controls in place in their systems and processes.

## **11. PROCUREMENT AND IT STRATEGY IMPLICATIONS**

- 11.1 There are no procurement or IT strategy implications arising from this report.

### **LOCAL GOVERNMENT ACT 2000** **LIST OF BACKGROUND PAPERS USED IN PREPARING THIS REPORT**

<b>No.</b>	<b>Description of Background Papers</b>	<b>Name/Ext of holder of file/copy</b>	<b>Department/ Location</b>
1.	Operational and performance management papers.	A Hyatt	HTH

## **Appendices**

Appendix 1 - Anti-Bribery Policy

Appendix 2 - Anti-Money Laundering Policy

Appendix 3 - Fraud Response Plan