

Wiltshire County Council

Anti-Fraud and Corruption Policy

Introduction

1. Wiltshire County Council is a large public authority which expects the highest standards of conduct and integrity from all who are employed by it, represent it or have dealings with it. The Council is aware of the high expectations of the public and the degree of scrutiny to which its affairs are subject. The Council is determined that the culture and tone of the organisation embody an opposition to fraud and corruption. Elected Members and employees are expected to lead by example.
2. The Council is also committed to ensuring that it maintains high standards of corporate governance, and this policy statement is seen as an important element of its overall governance framework. The purpose of the statement is to provide information about:
 - The Council's stance on fraud and corruption
 - How to report any concerns about malpractice
 - What action the Council will take when it receives such reports
 - The measures in place to combat fraud and corruption.
3. Acts of dishonesty within the Council are thankfully rare. This is a testimony to the skills, dedication and decency of elected Members, employees, and others with whom the Council has dealings. Constant vigilance is necessary to ensure this record continues. The Council will always take a robust approach to dealing with malpractice.

Reporting Malpractice

4. The general public are encouraged to report any concerns they may have. They may contact Internal Audit, on 01225 713622, or report through their elected representative. Elected Members may also report any concerns to Internal Audit, or through the County Treasurer, the Chief Executive, or the Monitoring Officer.
5. Employees have an important part to play in the Council's work against dishonesty. They have a duty to protect public assets and a responsibility to report any concerns they may have. They can do this in the knowledge that such concerns will be investigated properly. This is enshrined in the County Council's Whistleblowing Policy.

6. Immediately any member of staff or manager becomes aware of a loophole or other procedural weakness which could result in theft or fraud, it must be reported to Internal Audit.

Action Following Reporting

7. Any allegation of malpractice, fraud or corruption received will be investigated promptly and thoroughly. If appropriate, it will be referred to the Police for further investigation, and disciplinary action may be taken. The Council will act swiftly to strengthen any procedural weaknesses identified as part of the investigation.

Measures Against Fraud and Corruption

8. The Council operates within a framework of regulations, corporate policies, codes of conduct for staff and Members, standards, systems and procedures, all of which are designed to ensure the integrity of its activities and transactions.
9. Members and employees are aware that it is a criminal offence for them corruptly to receive or give any gift, loan, fee, reward or advantage for doing or not doing anything or showing favour or disfavour to any person or organisation, whilst acting in their official capacity. If an allegation is made, the Member or employee is expected to co-operate fully with the investigation which has to take place.
10. In addition, Members, school governors and employees must ensure that they use public funds entrusted to them in a responsible and lawful manner. They must strive to ensure value for money to the local community and avoid giving grounds for potential legal challenge to the Council.
11. Arrangements are in place and are developed to encourage the exchange of information between the Council and other agencies to combat fraud.

Personal Interests

12. Registers are maintained by chief officers and school governing bodies, in order to record interests declared by employees and their immediate families. Declared interests include items of both a financial and non-financial nature. The registers also record the receipt and offer of gifts and hospitality. With regard to elected members, the Monitoring Officer

maintains an equivalent Register of Members' financial and other interests, and also records the receipt and offer of gifts and hospitality.

13. Examples of non-financial interests would include acting as a school governor for a school within the County, being a member of an NHS Trust Board, or having involvement with an organisation which receives grant aid from the County Council.
14. Examples of financial interests include owning shares in, or being related to an employee of a company that provides goods or services to the County Council for financial consideration. This extends to companies that are submitting tenders for goods or services.

Hospitality and Gifts

15. Members and employees can only accept offers of hospitality if there is a genuine need to receive or impart information or represent the County Council in the community. Offers to attend purely social or sporting functions may be accepted only when these are part of the life of the community, or where the Council should be seen to be represented.
16. Officers who are in doubt about whether to accept an offer of a gift or hospitality should seek advice from the Monitoring Officer or the Corporate Standards Manager.
17. Members and employees cannot accept significant personal gifts from contractors and outside suppliers, although Chief Officers, headteachers and governors may allow employees to keep insignificant tokens such as inexpensive pens, diaries etc. These must be recorded on the Register.
18. Any acceptance of hospitality by staff must be properly authorised *by whom?* and recorded in the Register. Members and staff will decline all inappropriate offers of hospitality or gifts, courteously but firmly.

Relationships with Contractors

19. Employees who engage or supervise contractors or have an official relationship with contractors and have previously had or currently have a relationship in a private or domestic capacity, will declare that link to their Chief Officer or governing body and have no further involvement in the contract. Orders and contracts will be awarded on merit by fair competition, and many contracts contain an anti-corruption clause.

Conclusion

20. The Council has in place a clear network of systems and procedures to assist in the fight against fraud and corruption. It is determined that the highest standards of probity will apply to all its activities.

Summary of the Main Points of the Policy

- The County Council expects the highest standards of conduct and integrity from all who are employed by it, represent it, or have dealings with it.
- Anyone concerned about malpractice within the County Council can contact Internal Audit on 01225 713622.
- All allegations will be investigated and appropriate action taken.
- The County Council has rules and procedures in place to minimise the risk of fraud and corruption.
- The County Council is determined that the highest standards of probity will apply to all its activities.

Keith Robinson
Chief Executive

Mike Prince
County Treasurer