

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 public has high expectations of us and we are subject to rigorous scrutiny. We are determined that the culture and tone of our organisation embody an opposition to fraud and corruption. Elected Members and employees are expected to lead by example.
2. We are also committed to ensuring that we maintain high standards of corporate governance, and this policy statement is an important element of our overall governance framework. The purpose of this statement is to provide information about:
 - The Council's stance on fraud and corruption
 - The measures in place to combat fraud and corruption
 - What to do if you need to raise a concern.
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 we have dealings. Constant vigilance is necessary to ensure this record continues. We will always take a robust approach to dealing with malpractice.

Measures Against Fraud and Corruption

4. The Council operates within a set of regulations and corporate policies. These are designed to ensure the integrity of our activities and transactions, and to protect elected members and employees by helping them understand the framework within which they are expected to work.
5. It is a criminal offence for members or employees, whilst acting in their official capacity, corruptly to receive or give any reward or advantage that would favour or disfavour any person or organisation.
6. Members, employees and school governors 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.

7. The Council operates arrangements and exchanges information with the police, government departments and other local authorities in order to combat fraud.

Personal Interests

8. Members and employees are required to declare interests of both a financial and non-financial nature. These include their own interests and those of their immediate families. Examples of financial interests would include being a director of a company which does or wishes to do business with the council, or owning shares in such a company. 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.
9. These interests must be recorded in a register of interests. Employees' registers of interests are held by their Chief Officer's personal assistant. Members must declare their interests in a register that is held by the Head of Democratic Services. Members and employees must ensure that any entries made in the register of interests are kept up to date.

Hospitality and Gifts

10. Members and employees may only accept offers of hospitality if there is a genuine need to exchange information or represent the County Council in the community. Offers to attend purely social or sporting functions may only be accepted when these are part of the life of the community, or where the Council should be seen to be represented.
11. 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. Members and staff will decline all inappropriate offers of hospitality or gifts courteously but firmly.
12. All offers of gifts and hospitality, whether or not they are accepted, must be recorded in a register of gifts and hospitality. Employees' registers of interest are held by their Chief Officer's personal assistant. Members must declare offers of gifts and hospitality in a register that is held by the Head of Democratic Services. Members and employees must ensure that any entries made in the register of gifts and hospitality are kept up to date.
13. If staff are in any doubt about whether to accept an offer of a gift or hospitality, they must consult their line manager.

Relationships with Contractors

14. 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.

Reporting Malpractice

15. Members and employees have an important part to play in preventing fraud and corruption in the council's work. They also have a responsibility to report any concerns they may have about malpractice or wrongdoing. Any such concerns will be investigated properly. Information on how to report concerns can be found in the Council's Whistleblowing Policy.

Keith Robinson
Chief Executive

Mike Prince
County Treasurer