

Report To:	AUDIT COMMITTEE	Date:	10 FEBRUARY 2020
Heading:	CORPORATE GOVERNANCE UPDATE INCLUDING REVISED POLICIES AND PROCEDURES		
Portfolio Holder:	N/A		
Ward/s:	N/A		
Key Decision:	NO		
Subject to Call-In:	NO		

Purpose of Report

Robust Corporate Governance ensures organisations are doing the right things in the correct manner in an open, honest, inclusive and accountable way. Good governance leads to good management, performance and outcomes.

The Council has a framework of policies and procedures in place which collectively make up its governance arrangements. The Council should have in place various policies and procedures which set out its approach to preventing, detecting and investigating fraud and corruption. These policies and procedures have been updated and Committee is being asked to consider and approve the revised draft policies and procedures.

The report also provides the Committee with an annual update in relation to how the Whistleblowing Policy has operated in the preceding 12 months.

The report also considers whether the Local Code of Corporate Governance requires amendment and updates the Committee in relation to the actions outlined in the 2018-2019 Annual Governance Statement.

Recommendation(s)

Committee is asked to:

- 1. Approve the following revised policies and procedures:**
 - **Anti-Fraud and Corruption Strategy**
 - **Anti-Bribery Policy**
 - **Anti-Money Laundering Policy Statement and Procedures**
 - **Fraud Response Plan**
 - **Prosecution Policy**
 - **Whistleblowing Policy**
 - **Local Code of Corporate Governance**
- 2. Note how the Whistleblowing Policy has operated during 2019.**
- 3. Note progress made in relation to the actions outlined in the 2018-2019 Annual Governance Statement and make any comments or observations;**
- 4. Note the proposed process for the preparation of the 2019-2020 Annual Governance Statement.**

Reasons for Recommendation(s)

Fraud and Corruption are serious issues which can affect the services the Council provides, undermine the achievement of corporate objectives and impact upon the public's confidence in the integrity of Council Officers and Elected Members. The Council is therefore committed to the prevention, detection and investigation of all forms of fraud and corruption whether these are attempted from within or external to the organisation.

The Council is committed to creating an environment that is based on the prevention of fraud and corruption. This is achieved by promoting openness and honesty in all Council activities. The revised policies recommended to Committee set out the Council's approach to fraud and how the Council goes about preventing, detecting and enforcing identified fraudulent activity.

The periodic review of policies and procedures ensures the Council's approach is up to date and accords with current thinking and best practice.

It is best practice for the Local Code of Governance to be reviewed annually to inform the Governance Framework for the following year.

To ensure the Committee is adequately informed to enable it to monitor the operation of the Whistleblowing Policy in accordance with the recommendation of Central Midlands Audit Partnership (CMAP) in its audit report relating to Anti-Fraud and Corruption.

Alternative Options Considered

(with reasons why not adopted)

To not approve the revised policies and procedures as drafted is not recommended as the Council's existing policies and procedures should be reviewed regularly and kept up to date otherwise the Council is at potentially greater risk of experiencing fraudulent activity or for it to go undetected.

Members may make suggested amendments to the policies and procedures provided these are in line with legislation and best practice.

Detailed Information

BACKGROUND

The policies detailed below collectively underpin the way the Council approaches the risks from fraud the Council faces, and its approach to prevention, detection and investigation of potential fraudulent acts. It is considered prudent to review and update these policies on a regular basis to ensure they remain fit for purpose and in compliance with the latest legislation.

THE POLICIES

The following amended policies, strategies and procedures are appended to the report and are recommended for approval:

- Anti-Fraud and Corruption Strategy
- Anti-Bribery Policy
- Anti-Money Laundering Policy Statement and Procedures
- Fraud Response Plan
- Prosecution Policy
- Whistleblowing Policy
- Local Code of Corporate Governance

A. Anti-Fraud and Corruption Strategy

The strategy explains that as custodian of the public purse, the Council has a duty to ensure public money is protected from fraud and corruption. Fraud is the intentional distortion of financial statements or other records by persons internal or external to the Authority, which is carried out to conceal the misappropriation of assets or otherwise for gain. Corruption is the offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any other person.

The Council is therefore committed to creating an environment that is based on the prevention of fraud and corruption. This is achieved by promoting openness and honesty in all Council activities. The strategy explains what the Council does to prevent, detect and investigate fraud. The strategy sets out the reporting processes for potential fraud and corruption. The strategy also incorporates the Housing Benefit and Council Tax Support Anti-Fraud Policy.

The Strategy has been reviewed with only minor changes made to correct typing errors and to ensure consistency of terminology. The recommended changes are shown as track changes in the attached Strategy.

B. Anti-Bribery Policy

Bribery is an inducement or reward offered, promised or provided to gain personal, commercial or contractual advantage which is done either directly or via a third party. Bribery is a criminal offence.

The Council does not, and will not, pay bribes or offer improper inducements to anyone for any purpose. The Council does not, and will not, accept bribes or improper inducements.

The Council is committed to the prevention, deterrence and detection of bribery.

This Policy provides a framework to enable the Council's employees, Elected Members and other relevant persons to understand and implement arrangements enabling compliance. In conjunction with related policies and key documents it will also enable employees to identify and effectively report a potential breach.

The Policy has been reviewed with only minor changes made to correct typing errors and to ensure consistency of terminology. The recommended changes are shown as track changes in the attached Policy.

C. Anti-Money Laundering Policy Statement and Procedures

Money laundering describes offences involving the integration of the proceeds of crime or terrorist funds into the mainstream economy. Money laundering is the channelling of "bad" money into "good" money in order to hide the fact the money originated from criminal or terrorist activity.

The Procedure explains what an employee or an Elected Member should do if they know or suspect that money laundering activity is taking, or has taken place. The Council must have a Money Laundering Reporting Officer (MLRO) and the procedure explains that this is the Monitoring Officer. The procedure sets out what the MLRO does if a report of money laundering is made.

The Procedure has been reviewed with minor changes made to correct typing errors and to ensure consistency of terminology, new legislation has been referenced and additional paragraphs included to explain circumstances that may be susceptible to money laundering and details identification and record-keeping requirements. The recommended changes are shown as track changes with the additional paragraphs highlighted in yellow in the attached Procedure.

D. Fraud Response Plan

The Fraud Response Plan has been developed to provide assurance of a consistent, thorough and effectively managed response to any allegations of fraud affecting the Council.

The Monitoring Officer is responsible for overseeing investigations of suspected fraud or corruption. The plan sets out how the Monitoring Officer will manage investigations, how evidence will be collected and retained, the interviewing of witnesses and what happens at the conclusion of the investigation.

The Plan has been reviewed with only minor changes made to correct typing errors and update job titles. The recommended changes are shown as track changes in the attached Plan.

E. Prosecution Policy

This Policy sets out broad principles that will guide prosecutions. It also seeks to provide consistent guidelines for making decisions to prosecute. It is not intended to be prescriptive or exhaustive. The Council will exercise its discretion when appropriate, about the extent of involvement or action (as applicable) required, looking at each case individually.

A two-stage test will be undertaken prior to a decision to prosecute being made. First, an assessment of the available evidence (**“the evidential test”**) to determine whether or not there is enough evidence to secure a realistic prospect of conviction, will be undertaken. The second part of the test is an assessment of the interests of justice (**“the public interest test”**) i.e. understanding the extent the public interest needs to see that justice is seen to be done. Only where **both** the evidential and public interest tests are satisfied will a prosecution ever follow.

The Policy has been reviewed with minor changes made to correct typing errors, to clarify that a prosecution decision is based on a “realistic prospect of conviction” and to recognise civil enforcement penalties. The recommended changes are shown as track changes in the attached Policy.

F. Whistleblowing Policy

The Council also has in place a Whistleblowing Policy which sets out a process for people to confidently report concerns, such as fraud. This policy makes it clear that people can report their concerns without fear of reprisals.

Paragraph 8.1 of the Whistleblowing Policy states that:

“The Monitoring Officer has overall responsibility for the maintenance and operation of this policy. This Officer maintains a record of concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report these to the Standards and Personnel Appeals Committee and the Audit Committee once a year. The Whistleblowing Policy will also be reviewed on a bi-annual basis.”

The Policy had minor amendments made by in March 2019. A review of the policy has been undertaken. It is recommended that the policy is amended to include the details of the Head of Law and Governance (Monitoring Officer) at Mansfield District Council as an external contact for whistleblowing complaints. This Council’s Monitoring Officer provides reciprocal arrangements for Mansfield District Council.

The revised policy will also be reported to the Standards and Personnel Appeals Committee on 18 March 2020 for approval.

Application of Policy during the Preceding 12 Months

Since the last report to Committee there has been 1 reported incident of whistleblowing drawn to the Monitoring Officer’s attention. During the whole of the 2019 period, 4 whistleblowing complaints were received in total. Given the confidential nature of the complaints this report can only refer anonymously and in high level terms. A summary of the complaints received during 2019 are set out below:

COMPLAINT REFERENCE	NATURE OF COMPLAINT	STATUS OF COMPLAINT	OUTCOME/ACTION TAKEN
2019-01	<p>Anonymous complaint received via a Trade Union.</p> <p>Complaint related to alleged breaches of the agile working guidelines.</p>	Closed.	<p>An investigation was carried out. The complaint was not substantiated.</p> <p>Recommendations made in respect of:</p> <ul style="list-style-type: none"> • Time recording whilst agile working • Clarifying some elements of the guidelines • Communication of the guidance to employees
2019-02	Anonymous complaint alleging unfair treatment of staff and management conduct.	Closed.	<p>Insufficient detail was provided to follow up the complaint formally.</p> <p>No further action.</p>
2019-03	<p>Anonymous complaint received via a Trade Union.</p> <p>Complaint alleged officers took annual leave instead of sick leave.</p>	Closed.	An investigation was carried out. The complaint was not substantiated.
2019-04	<p>Anonymous complaint via an Elected Member.</p> <p>Complaint related to alleged inappropriate use of Council resources.</p>	Closed.	A high level review was undertaken in conjunction with the CEO based on the limited information provided. There was no justification for carrying out a detailed investigation. Based on the content and tone of the complaint there is a possibility the complaint was vexatious.

Previous Application of Policy

The following table sets out the application of the Whistleblowing Policy since 2010 to the present date:

YEAR	TOTAL NUMBER OF COMPLAINTS	NO FURTHER ACTION	MANAGEMENT RECOMMENDATIONS	DISCIPLINARY/GRIEVANCE INVESTIGATION
2010	4	1	2	1
2011	0	N/A	N/A	N/A
2012	3	0	2	1 (ACTION TAKEN)
2013	1	0	0	1 (ACTION TAKEN)
2014	4	1	1	3 (2 WITH ACTION TAKEN)
2015	2	1	1	0
2016	2	0	1	1
2017	3	1	1	1
2018	3	1	0	2
2019	4	3	1	0

G. Local Code of Corporate Governance

Governance ensures organisations are doing the right things in the correct manner in an open, honest, inclusive and accountable way. Good governance leads to good management, performance and outcomes.

The Council has a framework of policies and procedures in place which collectively make up its governance arrangements including the policies presented for approval with this report. This Local Code of Corporate Governance sets out the Council's arrangements and is based on the guidance "Delivering Good Governance in Local Government" published by CIPFA (the Chartered Institute of Public Finance and Accountancy) and SOLACE (the Society of Local Authority Chief Executives) in 2016.

The CIPFA/SOLACE guidance identifies seven core principles and various sub principles; the recommended Local Code of Corporate Governance is based on these seven core principles. The seven principles are:

- A. Behaving with integrity, demonstrating strong commitment to ethical values and respecting the rule of law
- B. Ensuring openness and comprehensive stakeholder engagement
- C. Defining outcomes in terms of sustainable economic, social and environmental benefits
- D. Determining the interventions necessary to optimise the achievement of the intended outcomes

- E. Developing the Council's capacity, including the capability of its leadership and the individuals within it
- F. Managing risks and performance through robust internal control and strong public financial management
- G. Implementing good practices in transparency, reporting and audit to deliver effective accountability

The Local Code of Corporate Governance informs the Annual Governance Statement.

The Local Code of Governance is subject to annual review to inform the governance framework for the following year. The revised Code is attached with changes shown in track changes. One minor change to the Code is suggested to acknowledge the establishment of the Discover Ashfield Board.

UPDATE IN RESPECT OF THE ACTIONS SET OUT IN THE 2018-2019 ANNUAL GOVERNANCE STATEMENT

The Annual Governance Statement

The Annual Governance Statement is prepared in order to publically report on the extent to which the Council has complied with its Local Code of Governance.

The Annual Governance Statement looks at how the effectiveness of the Council's governance arrangements have been monitored and evaluated during the year and looks at any planned changes.

Improvement Actions

As part of the Council's drive to continuously improve its existing governance framework to meet changing conditions, the following actions were identified in the 2018-2019 Annual Governance Statement to take place during 2019-2020:

Improvement Action	Lead Officer	Target Date	Update
Community Engagement Strategy – monitoring and evaluating engagement	Interim Director of Place and Communities & Assistant Director Place and Wellbeing	March 2020	Research has been undertaken to unearth best practice examples, which may be suitable for Ashfield and the beginnings of a strategy has been developed. Meetings have taken place with a number of officers across the Council to understand what could be built upon, and a meeting took place with Scrutiny Panel A, to link to the piece of work they are undertaking.

			<p>In the recent Working Together group meeting, ideas were explored and considered, around the subject of community engagement, based on a visit to Wigan Council, who have recently received an award from the LGA for the Wigan Deal. It is anticipated that these two things could come together, to create a meaningful strategy, created through engagement with staff and residents.</p> <p>Due to other commitments, mainly the Leisure Transformation Programme, further development of the strategy has not taken place. Capacity options to develop the strategy further are being explored.</p>
Digital Transformation Programme	Director of Resources & Business Transformation Service Manager Corporate Support and Transformation	Business Case Approval - July 2019 Ongoing Implementation	Completed Ongoing implementation aligned to Strategy, Blueprint and Roadmaps on key elements covering Self-Serve / Technology / Data & People
New Corporate Plan with new performance measures	Chief Executive & Service Manager Corporate Support and Transformation	July 2019	Completed
Consultation with tenants on new resident involvement structure/opportunities	Director of Housing and Assets	To commence June 2019 and complete December 2019	Completed

Development of a system to track and evaluate the outcome and implementation of decisions	Director of Legal and Governance & Service Manager Corporate Support and Transformation	December 2019	The use of Pentana is being trialled at the moment with the intention of rolling the system out for the start of the next municipal year.
Tenants Charter	Director of Housing and Assets	To commence June 2019 and complete December 2019	Completed
Standards and Personnel Appeals Committee – 2019/20 work plan item to consider in detail the report of the Committee on Standards in Public Life and ways the Council may implement best practice recommendations.	Director of Legal and Governance	March 2020	<p>The Committee members have met on a number of occasions to consider the best practice recommendations.</p> <p>Three reports have been presented to the Standards and Personnel Appeals Committee to date with a further update report due to be presented to the next meeting in March 2020.</p> <p>The adoption of the best practice recommendations will continue into the next municipal year.</p>

Significant Governance Issues

While the effectiveness review and other developments during 2018-2019 demonstrated that the Council's corporate governance arrangements and the internal control framework were fit for purpose and effective, as part of continuing efforts to improve governance arrangements the following significant governance issues were identified for improvement during 2019-2020:

Key Improvement Area	Lead Officer	Target Date	Update
FINANCIAL SUSTAINABILITY	Corporate Finance Manager &	Ongoing	Central Government delayed implementation of the Fair Funding

<p>The year 2019/20 is the final year of the four-year financial settlement provided by the Government. The Fair Funding Review and the move to 75% retained business rates and the proposed business rates reset provides further uncertainty in respect of the Council's finances after 2020.</p> <p>Although the MTFS was refreshed in February 2018 the changing landscape of local government finance and the potential for changes to the Corporate Plan requires more frequent updates of the MTFS and the savings strategy. The MTFS has been updated to reflect further changes since that date including savings and investments for 2019/20 and the reduced level of New Homes Bonus achieved compared with the level assumed and planned for in the February 2018 MTFS.</p> <p>A further revised MTFS will be taken to Cabinet following the closure and audit of the 2018/19 accounts.</p>	<p>Section 151 Officer</p>		<p>Review, Business Rates re-set and proposed changes to the level of Business Rates retention. Instead of a 3 year Spending Round, Local Authorities instead were advised of a one year settlement for 2020/21, consequently significant uncertainty remains about future levels of central government funding beyond 2020/21.</p> <p>Corporate Leadership Team (CLT) and Cabinet have worked throughout the year considering options to close the MTFS funding gap for 2020/21 and beyond. The Council is now able to set a balanced budget for 2020/21 and has a strategy in place to address the estimated funding gaps in future years. Future levels of New Homes Bonus (NHB) funding remains uncertain and the Council's MTFS assumption is prudent assuming no legacy payments will be made for NHB earned in 2019/20 for 2020/21.</p> <p>A revised MTFS will be taken to Council in March 2020 when the 2020/21 Budget and Council Tax is set and a further update will be taken after the 2019/20 accounts have been closed and audited.</p>
<p>INVESTMENT IN COMMERCIAL PROPERTIES</p>	<p>Corporate Finance Manager & Section 151 Officer</p>	<p>Ongoing</p>	

<p>2017/18 saw the introduction of a new regulatory environment with CIPFA's new Prudential and Treasury Management Codes. These changes will start to impact significantly in 2019/20. The Council put in place a Capital Strategy and Treasury Management Strategy which brings together policies around Capital, Debt and Investment. These strategies were approved by Council on 4 March 2019.</p> <p>Through the Capital Programme the Council has purchased commercial investment properties totalling £24 million to date (March 2019) and has increased its borrowing requirement. This Council has also set out in its Capital Strategy an aspiration to invest at a rate of £20m per year for the next four years to generate income to sustain delivery of services to residents. Guidance currently awaited from CIPFA may require that this aspiration is revisited and a revised strategy to Council may be necessary. It will remain essential to effectively manage the investment portfolio in light of the ever changing economic climate whilst also having a clear understanding of how such risks and rewards impact on the Council's financial position.</p>			<p>Updated Treasury Management and Capital Strategies will be considered at Audit Committee on 10 February 2020 and will be considered at Council for approval on 5 March 2020.</p> <p>The Council has purchased Commercial Investment Properties totalling £36.2m to date (January 2020) and is currently considering the acquisition of 3 further properties (£22m). The Capital Strategy sets out an aspiration to invest a total of £105m in Investment Properties to generate income to sustain delivery of services to residents. Council approved (5 September 2019) that the planned £20m investment for 2020/21 be brought forward to 2019/20.</p> <p>The CIPFA Guidance has been issued and considered and the view is that the Council is compliant with this.</p>
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<p>The new Capital Strategy provides the opportunity to fully explore a wide range of investment options based upon the Council's risk appetite whilst also ensuring proper due diligence and long term planning to reflect current and planned treasury positions.</p>			<p>A revised Capital Strategy will be considered at Audit Committee on 10 February, Cabinet on 24 February for approval by Council on 5 March 2020.</p>
<p>DATA MATCHING AND NATIONAL FRAUD INITIATIVE</p> <p>A review was carried out in 2018/19 to identify how the Council uses NFI and data matching to enable the corporate approach to be developed. An exercise was also carried out regarding Council Tax Single Person Discount. The Council must now determine an action plan to prioritise improvements. The refreshed approach will give the Council the opportunity to develop and embed their anti-fraud culture.</p>	<p>Service Manager – Revenues and Benefits</p>	<p>December 2019</p>	<p>Throughout 2019-20 the work on NFI data matching has continued. In the summer of 2019 the 2019-20 Single Person Discount (SPD) review was completed with the help of CMAP. A further, unscheduled data matching process was undertaken in the Autumn of 2019 which involved Housing Benefit claim data being matched to HMRC records to identify potential fraud in declared earnings and savings. This is now complete. In December 2019 the Council signed up to the NFI Premium SPD Review service which involved over 19,000 records being data matched against Credit Reference data. The target data matches are currently being worked on, with a target completion date of 30th April 2020.</p> <p>The Data Matching Group held a meeting in December 2019 to discuss the NFI product,</p>

			<p>covering the APP Check module, and the Re-Check module (targeted data matching selected by the Council).</p> <p>The Group was given advanced notice of the National Fraud review this year which will start in the Autumn with the data extraction process by all participating services.</p> <p>Draft Terms of Reference and an Action Plan for the Group have been drafted and will be finalised shortly.</p>
<p>LOCAL PLAN</p> <p>The Council decided to withdraw its emerging local plan in September 2018 and to commence the preparation of a new plan. The Local Development Scheme (LDS) was approved by Cabinet on 1 October 2018 and this provides a detailed report on the process to be followed and the timetable, which includes target milestones. The Council met with MHCLG in May 2019 to discuss the progress made with the new plan. It is anticipated the initial draft of the plan will be completed by January 2020 and, by March 2020, it is expected that public consultation on the draft plan will be underway. The Local Plan itself is not expected</p>	<p>Interim Director of Place and Communities and Assistant Director, Planning and Regulatory Services</p>	<p>In accordance with the LDS timetable</p>	<p>Members and officers have met regularly to establish the vision and direction of the Local Plan.</p> <p>The Call for Sites was carried out in accordance with established timescales. Following discussion with Councillors a further call for sites was undertaken to understand the potential for a village approach in the longer term. An assessment of all sites submitted has been undertaken.</p> <p>The Council has also commissioned consultants to undertake the Sustainability Appraisal which is underway and has jointly commissioned a Gypsy and Traveller Study, employment study and is currently considering a joint retail study. The Council is also in the</p>

<p>to be adopted until Summer 2022.</p>			<p>process of commissioning work on understanding and underpinning infrastructure requirements for new villages.</p> <p>Officers and members are currently working together to produce spatial visions to be tested through the Sustainable Appraisal process. This is due to be passed to consultants shortly.</p> <p>Some delay has slipped into the programme with the call for additional sites and the general election in 2019. It is intended to recapture some slippage later in the programme to keep the overall adoption as close to the original timeframes as possible. An ambitious programme has been developed to consult in April/May and additional meetings have been programmed for the members working group along with a potential Extraordinary Cabinet.</p>
<p>EU Exit</p> <p>A Deal or No-Deal EU Exit is expected to have an impact on Ashfield residents and businesses as well as on the Council's services. The Council will continue to be required to participate and actively engage with the Nottinghamshire Local Resilience Forum.</p>	<p>Director of Resources & Business Transformation</p>	<p>Ongoing</p>	<p>Ongoing</p> <p>Brexit Lead Officer & Member Champion designated.</p> <p>Ongoing participation in teleconferences with MHCLG/Home Office / LGA / Resilience Forum.</p>

<p>'Rising Tide' monitoring and impact reports will continue to be presented to CLT and to Cabinet/Council (if required) to outline the Council's response and support interventions.</p>			<p>Internal Brexit Officers Group set up and tasked with key actions.</p> <p>Bi-weekly updates to CLT.</p> <p>Monthly updates to Members.</p> <p>Added to Corporate Risk Register</p>
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PROPOSED PROCESS FOR THE PREPARATION OF THE ANNUAL GOVERNANCE STATEMENT 2019-2020

- The initial review of the effectiveness of the Council's governance framework will be conducted by the Council's Director of Legal and Governance (Monitoring Officer) supported by the Assistant Director - Corporate Services and Transformation.
- The findings reported by External Audit and other external review bodies and the work of Internal Audit and other internal assurance providers will be considered as part of the review.
- To inform the process, the Corporate Leadership Team will carry out a Corporate Assurance Assessment and each Director will provide a Statement of Assurance.
- The Constitution review, performance reporting and risk management arrangements will also be taken into account.
- The results of all this review work will be set out in a draft Annual Governance Statement prepared by the Director of Legal and Governance (Monitoring Officer) supported by the Assistant Director - Corporate Services and Transformation. This draft will be prepared during February and March 2020.
- The Corporate Leadership Team will review the draft Statement and consider whether the improvements proposed represent an appropriate and proportionate response to any significant governance issues identified.
- The draft Governance Statement, modified to reflect the views of the Corporate Leadership Team, will be considered by a Member Working Group made up of the Council's Audit Committee.
- The Director of Legal and Governance (Monitoring Officer) will finalise the Annual Governance Statement by the end of May 2020 in readiness for the finalisation of the 2019/20 Statement of Accounts.
- The Audit Committee at its meeting in July 2020 will formally approve the Annual Governance Statement.

PUBLICATION

Once the strategies, policies and procedures have been approved by the Audit Committee they will be published internally on the Council's Intranet and externally on the Council's website.

ANTI-FRAUD AND CORRUPTION STRATEGY GROUP

In order to ensure the Council takes a corporate approach to dealing with fraud and corruption, the Anti-Fraud and Corruption Strategy Group continues to meet on a quarterly basis. The Group consists of Director of Legal and Governance (Monitoring Officer) and representatives from Finance, Legal, Estates, Revenues and Benefits, Housing, CMAP, Communications, Procurement and Human Resources with other officers brought on to the group as necessary. The Group develops and delivers an annual work plan.

Implications

Corporate Plan:

The aim of the Council is to ensure that we continue to remain financially sustainable, whilst at the same time ensuring that we continue to provide the key services on which our residents and businesses rely.

It is important that the Council has the most effective infrastructure and support to enable:-

- The delivery of the Corporate Plan
- Financial sustainability to continue to deliver key services
- A productive workforce that delivers services well

Legal:

Each of the policies deals with the relevant legislative frameworks.

The Council's Local Code of Corporate Governance is based on the CIPFA/SOLACE guidance as set out in the report.

The Council is required by law to undertake an annual review of the effectiveness of its systems of control and produce an annual governance statement – Regulation 6 of the Accounts and Audit Regulations 2015.

Finance:

Budget Area	Implication
General Fund – Revenue Budget	<p>Whilst there are no direct financial implications, if such policies are not in place and adhered to, there is potential for fraud and financial loss to the Council.</p> <p>There is a budget of £10k which is specifically for the purpose of funding costs associated with fraud which falls to the Monitoring Officer to release and monitor.</p>

General Fund – Capital Programme	As above.
Housing Revenue Account – Revenue Budget	As above.
Housing Revenue Account – Capital Programme	As above.

Risk:

Risk	Mitigation
<ul style="list-style-type: none"> • Policies Failure to review and update policies and procedures would potentially increase the risk of fraudulent activity taking place which affects the Council, or that the Council is not able to effectively deter or detect fraudulent activity taking place. • Local Code of Corporate Governance Failure to review the Local Code of Corporate Governance would mean the governance framework is not complied with and would impact on the annual governance statement process. Failure to monitor progress in relation to action and significant issues set out in the annual governance statement. • Whistleblowing Policy Failure to maintain integrity and confidence in the policy 	<p>Policies have been reviewed and revised to ensure they are kept up to date and are accurate (as presented to Committee for approval). Work plan to improve systems and processes Anti-Fraud and Corruption Strategy Group oversees implementation of the work plan and keeps the policies under review. Fraud Risk Assessment exercise Roll out of training Publication of policies</p> <p>The review ensures compliance with the governance framework and assists with the annual governance review.</p> <p>Annual reporting to the Audit Committee and Standards and Personnel Appeals Committee. Annual update on the application of the policy. Update reporting in accordance with the policy to the Whistleblower (if identified). Identification of trends in disclosure to inform Management.</p>

and its applications.	
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Human Resources:

Training will be rolled out to relevant employees and Elected Members. All employees will be made aware of the revised policies and will be accessible to all for future reference.

Regular review, maintenance and consistent application of the Whistleblowing Policy infers good employment practices. As such it is important to maintain the integrity of the policy.

Environmental/Sustainability

There are no Environmental/Sustainability issues identified in the report or the policies reviewed.

Equalities:

The policies themselves do not highlight any equality issues. Any equalities issues will be identified when dealing with specific investigation or in the application of the policies and procedures as relevant.

Other Implications:

None.

Background Papers

None.

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