

# OXFORD CITY COUNCIL

## Oxford City Council Anti-Bribery, Fraud and Corruption Policy

<b>Document</b>	Anti-Bribery, Fraud and Corruption Policy
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<b>Date Reviewed</b>	September 2018
<b>Review due</b>	February 2020
<b>Version</b>	4

<b>Version No.</b>	<b>Date</b>	<b>Notes</b>
1	Sept 2018	First Draft of Policy to Investigation Manager for review and comments
2	Oct 2018	Second Draft of Policy to Head of Finance for review and comments
3.	Feb 2019	Third Draft of Policy to Policy Team and Legal for review and comment
4	March 2019	Final Draft of Policy with additions and alterations from reviews by Legal and Policy.
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## **1. Introduction**

- 1.1 This Policy aims to provide guidance on how to raise concerns about bribery, fraud or corruption within the Council.
- 1.2 In carrying out its functions and responsibilities, the Council wishes to promote a culture of openness and fairness and expect all those who work for and with the Council to adopt the highest standards of propriety and accountability.
- 1.3 The Council expects the highest standards of conduct, performance and integrity from its employees and Elected Members. Staff working for Oxford City Council must comply with the standards of conduct, performance and integrity as set out in the Code of Conduct, which is published to all staff via the Intranet. The Code applies to both permanent and temporary staff and also to anyone engaged through a third party or otherwise working on behalf of Oxford City Council or on Oxford City Council premises.
- 1.4 Following the publication of the Nolan Report in 1997, the Local Government Act 2000, and several well publicised cases concerning fraud and corruption within local government, the Council recognises the need for a policy to prevent wrongdoing.

## **2 Council Priority**

- 2.1 An efficient and effective Council

## **3 Policy Statement**

- 3.1 Oxford City Council is committed to preventing and detecting bribery, fraud and corruption. It is fully committed to the highest ethical standards, in order to ensure the proper use and protection of public funds and assets

The Council acknowledges that in approving this Policy:

- it sets the standard at a sufficiently high level that makes it clear that bribery, fraud or corruption will not be tolerated;
  - that the Council is committed to preventing and detecting bribery, fraud or corruption;
  - that those perpetrating bribery, fraud or corruption may be prosecuted.
- 3.2 The Council acknowledges that the vast majority of its employees and those that work with them act with honesty and integrity at all times to safeguard the public resources they are responsible for. However, there are people who will not act in this way.

3.3 The Council will undertake investigative activity regardless of the suspect's length of service, position/title, or relationship to the Council.

3.4 In order to implement this policy the City Council will:

- Provide a clear framework, guidelines and procedures for the identification and investigation of bribery, fraud and corruption
- Investigate all cases of bribery, fraud and corruption and take appropriate action
- Ensure employees and members have the appropriate level of information and training to implement this policy
- Ensure information is provided to enable the general public to report suspected cases of bribery, fraud and corruption

#### **4 Policy Scope**

4.1 This Policy, which applies to all employees (including temporary and agency staff), aims to help to understand when, how and who to contact when they have concerns about bribery, fraud or corruption. Employees must ensure they adhere to legal and contractual requirements and ensure that all procedures and practices remain above reproach.

#### **5 Roles and Responsibilities**

5.1 Bribery, fraud and corruption are ever present threats to Oxford City Council resources. Resources may include material, property, plant, equipment, cash, staff time, software, confidential information, intellectual property and contracts.

5.2 Senior Managers are responsible for the prevention, detection and investigation of bribery, fraud or corruption and for managing the risk of bribery, fraud or corruption.

5.3 Elected Members and the Executive of Oxford City Council are responsible for the implementation of this Policy.

5.4 Oxford City Council Corporate Investigation Team will investigate all relevant instances of bribery, fraud and corruption.

5.5 All employees, contractors, sub-contractors, consultants and agents of Oxford City Council are responsible for the safeguarding of resources for which they are responsible.

## 6 Interaction with other Council Policies and External documents

- 6.1 This policy should be read in conjunction with;
- the [Anti-Money Laundering Policy](#) for Oxford City Council;
  - the [Whistle-blowing Policy](#);
  - the [Disciplinary Policy](#) and
  - the [Employee Code of Conduct](#).
- 6.2 Supplier compliance with this policy will be incorporated as a requirement within the Council's standard contract terms.

## 7 Duties

- 7.1 The Council's Executive Group has a legal obligation to ensure the appropriate use and safeguarding of Public funds.
- 7.2 Oxford City Council has a legal responsibility under the Accounts and Audit (England) Regulations 2011 for ensuring that the financial Management of the Council is adequate and effective and that the Council has a sound system of financial control which facilitates the effective exercise of its functions, which includes arrangements for the management of risk.
- 7.3 There is also a legal responsibility under the Local Government Act 1972 for every Local Authority to make arrangements for the proper administration of their financial affairs and to secure that one of their Officers has responsibility for the administration of those affairs.

## 8 Definitions – Fraud

- 8.1 According to the Fraud Act 2006, fraud can be committed in the following three ways:

**Fraud by false representation:** “representation” means any representation as to fact or law and may be express or implied. A person commits an offence when they dishonestly make a false representation, and intends, by making the representation to:

- make a gain for themselves or another; or
- cause loss to another person; or
- to expose another to a risk of loss.

A representation is false if:

- it is untrue or misleading; and
- the person making it knows that it is, or might be, untrue or misleading.

**Fraud by failing to disclose information:** an offence is committed where a person dishonestly fails to disclose to another person information, which he is under a legal duty to disclose, and intends, by failing to disclose the information to:

- make a gain for himself or another; or
- cause loss to another or to expose another to a risk of loss.

**Fraud by abuse of position:** an offence is committed where a person occupies a position in which they are expected to safeguard, or not to act against, the financial interests of another person, dishonestly abuses that position, and intends, by means of the abuse of that position to:

- make a gain for themselves or another; or
- cause loss to another or to expose another to a risk of loss.

- 8.2 The term *fraud* is used to describe such acts as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusions.
- 8.3 This Policy therefore covers all financial impropriety including ***theft*** or ***corruption***, which are described in more detail below:
- 8.4 According to the 1968 Theft Act 'a person shall be guilty of theft if they dishonestly appropriate property belonging to another with the intention of permanently depriving the other of it'.
- 8.5 Corruption is the offering, giving, soliciting or acceptance of an inducement or reward that may influence the actions taken by the audited body, its members or employees.

## 9 Actions Constituting Fraud or Corruption

- 9.1 Actions constituting fraud or corruption may include, but are not limited to:
- any dishonest or fraudulent act against the Council;
  - forgery or alteration of any document or account belonging to the Council;
  - forgery or alteration of a cheque, bank draft or any other financial document;
  - misappropriation of funds, securities, supplies, or other assets;
  - impropriety in the handling or reporting of money or financial transactions;
  - profiteering as a result of insider knowledge of Council activities;
  - disclosing confidential and proprietary information to outside parties;
  - destruction, removal or inappropriate use of records, furniture, fixtures and equipment; or
  - failure to declare an interest.
- 9.2 Areas particularly susceptible to bribery, fraud or corruption are set out below with examples of fraudulent activity (the list is not exhaustive):

- contracts - collusion with others during the tendering process;
- council tax - people claiming single person discount when they are not entitled to;
- recruitment fraud - fictitious work history, qualifications and/or references;
- abuse of position - falsification of records to cover up fraudulent activity such as stolen cash;
- travel claims - false journeys claimed; inflated mileage; two employees claiming for a journey taken together;
- expense claims - claims submitted to the Council and/or a third party;
- cash receipts/petty cash - accepting cash without receipting it; reimbursement sought for receipted but inappropriate expenditure;
- payroll - hours worked over-stated to take advantage of overtime for financial gain;
- ordering and payments - goods ordered for personal use; goods ordered from a specific supplier in return for some form of benefit;
- stocks and assets - unauthorised use of stationery; using Council assets for personal use such as running a private business; or
- timesheets - falsifying hours worked; claiming to be sick but carrying out paid work elsewhere.

## 10 Definitions – **BRIBERY**

10.1 The Bribery Act 2010 was introduced to update and enhance UK law on bribery including foreign bribery. Notably, it introduces a new strict liability offence for companies and partnerships of failing to prevent bribery. The introduction of this new corporate criminal offence places a burden of proof on local authorities to show that they have adequate procedures in place to prevent bribery. The Council could be guilty of an offence if an ‘associated person’ carries out an act of bribery in connection with its business. A person will be ‘associated’ with the Council where that person performs services for or on behalf of the Council. The Bribery Act also provides for strict penalties for active and passive bribery by individuals as well as companies.

The Bribery Act creates four prime offences:

- two general offences covering the offering, promising or giving of an advantage, and requesting, agreeing to receive or accepting an advantage;
- a discrete offence of bribery of a foreign public official; and
- a new offence of failure by a commercial organisation to prevent a bribe being paid to obtain or retain business or a business advantage (should an offence be committed, it will be a defence that the organisation has adequate procedures in place to prevent bribery).

- 10.2 Bribery can be described as the receiving of an inducement for an action which is illegal, unethical or in breach of trust. Inducements can take the form of gifts, fees, rewards or other advantages.

## **11 Identification of Risk**

- 11.1 In having a risk management strategy, which includes risk mitigation measures, the Council aims to detect bribery, fraud or corruption and deter potential perpetrators of such activity.
- 11.2 In having a continuous programme of bribery, fraud and corruption awareness and regular updates and training for new and existing staff the Council aims to mitigate the risk of bribery, fraud or corruption taking place.
- 11.3 In referring to this Policy in its quotation/tender documents with suppliers and its procurement guide, the Council aims to mitigate the risk of bribery, fraud or corruption taking place.

## **12 Reporting Suspicious Activity**

- 12.1 The Council has in place a number of ways of reporting suspicions of bribery, fraud or corruption.
- 12.2 Non-employees of the Council can use the Council's complaints process, or the complaints process relating to the Member's Code of Conduct.
- 12.3 In relation to employees, the Council will deal with matters in confidence and in accordance with the terms of the Whistleblowing Policy and the Public Interest Disclosure Act 1998.

## **13 Reporting Bribery, Fraud or Corruption**

- 13.1 In accordance with the Council's Finance Rules in the Council's Constitution, "If Officers suspect that these Rules have not been complied with, or they suspect fraud, corruption or poor value for money, they must tell their line manager (unless their line manager is involved). The Council's [Whistle Blowing Policy](#) has guidance on what to do if a line manager is involved. If these Finance Rules or the Avoiding Bribery Fraud and Corruption Policy have been breached, the Head of Financial Services must be advised in writing by the line manager as soon as possible."

## **14 Receiving Reports and Preventing Bribery, Fraud or Corruption**

- 14.1 The following paragraphs set out more specifically the roles and responsibilities of those receiving reports of bribery, fraud or corruption and their roles and responsibilities in preventing wrongdoings arising in the first place.



- 14.2 The anti-bribery, fraud and corruption response plan provides further information on who should take what action on discovering a potential bribery, fraud or corruption.
- 14.3 **The Monitoring Officer** has responsibility for:
- initiating action if bribery, fraud or corruption may have been identified;
  - the lawfulness and fairness of decision making;
  - ensuring that Members are aware of the protocols, policies and procedures, as set out at the end of this Policy that apply when carrying out their duties.
- 14.4 **The Section 151 Officer** has responsibility for:
- ensuring that this Policy is current;
  - the proper administration of the Councils' financial affairs under s.151 of the Local Government Act 1972 and s.114 of the Local Government Finance Act 1988. This includes the employee nominated by him/her to act in his/her absence and any employee of his/her staff acting on his/her behalf;
  - reporting to Members and the National Audit Office if the Council, or one of its representatives makes, or is about to make a decision which is unlawful, or involves illegal expenditure or potential financial loss (Local Government Finance Act 1988 s.114);
  - Upon receipt of an allegation under this policy, the person receiving the allegation must immediately notify the Monitoring Officer, the Head of Financial Services and the Head of Business Improvement (unless the allegation relates to one or more of them).
- 14.5 **Human Resources** is responsible for ensuring that new employees, during induction, are aware of their contractual obligations in relation to anti-bribery, fraud or corruption as well as this Policy, and its links with the Whistleblowing Policy.
- 14.6 **Managers** are responsible for:
- maintaining internal control systems and communicating them to their staff;
  - ensuring that the Council's resources and activities are properly applied in the manner intended;
  - identifying the risks to which systems and procedures are exposed;
  - developing and maintaining effective controls to prevent and detect bribery, fraud and/or corruption;
  - ensuring that controls are being complied with;
  - implementing audit recommendations promptly; and
  - responding to reports of possible financial impropriety in accordance with the Whistleblowing Policy.

- 14.7 **Individual employees** should take seriously and treat with confidence any concerns raised about a potential bribery, fraud or corruption. The Council encourages reporting of suspicions and will protect those who do so (even if the suspicions are unfounded but made with good intent), as set out in the Council's Whistleblowing Policy.
- 14.8 The Council expects employees to follow any code of conduct relating to their personal professional qualifications and abide by the Council's Code of Conduct.
- 14.9 Employees must operate within Section 117 of the Local Government Act 1972, to give notice in writing of pecuniary (financial) interests in contracts relating to their Council or the offer of any fees or rewards other than their proper remuneration.
- 14.10 All employees must declare any offers of gifts or hospitality, which are in any way related to the performance of their Council duties. The Council's [guidance on gifts and hospitality](#) provides more information.

Employees should not undertake work or activities outside their direct employment with the Council if their Council duties overlap in some way with their proposed work or activity, e.g. by causing a conflict of interest or by making use of material to which they have access by virtue of their Council employment.

- 14.11 Any employee wishing to undertake other employment should check with their manager whether they need permission from their Head of Service to do this and whether they should register the employment on an annual basis. If the employee needs permission the Head of Service should send copies of correspondence, including permission, to human resources who will record it.
- 14.12 The Council encourages all staff to make voluntary declarations for all secondary employment based on the need for open government.
- 14.13 As well as employment contract obligations, each employee is responsible for:
- remaining aware of the policies and procedures set out at the end of this Policy;
  - their own conduct and contribution towards the safeguarding of Council standards in accordance with the policies and procedures set out at the end of this Policy;
  - acting with propriety when using Council resources, when handling Council funds, whether they are involved with cash or payments systems, receipts or dealing with contractors or suppliers; and

- reporting details immediately to their line manager or the most appropriate employee if they suspect that bribery, fraud or corruption has been committed or they have seen any suspicious acts or events.

**14.14 The Corporate Investigation Team**

has responsibility for:

- the independent appraisal of control systems;
- undertaking or assisting in the investigation of irregularities.

The team carries out activities to prevent and detect any fraud that could affect the Council.

**14.15 Members and Co-opted Members** of the Council's Committees should take seriously and treat with confidence any concerns raised about a potential bribery, fraud or corruption. The Council encourages reporting of suspicions and aims to protect those who do so (even if the suspicions are unfounded but made in good faith).

Members and co-optees must ensure that they avoid any situation where there is potential for a conflict of interest.

Each Member or co-optee of the Council is responsible for:

- observing standards, set out in the [Member's Code of Conduct](#); and
- familiarising themselves with the codes, protocols, policies and procedures as set out at the end of this document.

**14.16 The external auditor** has responsibility for:

- reviewing the stewardship of public money by the Council; and
- considering whether the Council has adequate arrangements in place to prevent bribery, fraud or corruption.

**14.17 The Cabinet Office** has responsibility nationally for:

- National Fraud Initiative (NFI) data matching exercises
- under Section 6 of the Audit Commission Act 1998, the Cabinet Office (previously the Audit Commission) requires all councils to provide employees' (including Members') payroll data to enable data matching to take place with the aim of preventing and detecting fraudulent and erroneous payments from the public purse. The Council participates in this.

**14.18 The Audit and Governance Committee** have responsibility for:

- risk management issues and making any recommendations therein;
- the overview of the Council's Whistleblowing Policy;

- the overview of the Council's anti-bribery, fraud and corruption arrangements;
- matters relating to the Member's Code of Conduct that the Monitoring Officer refers to them.

14.19 **The Police** may:

- investigate links to offences;
- give prevention advice;
- advise on any pre-investigation work; and
- maintain a dialogue with management and/or internal audit during an investigation.

## 15 **Prevention of Bribery, Fraud and Corruption – Regulatory Framework**

15.1 The Council has a wide range of mechanisms in place aimed at preventing and detecting bribery, fraud or corruption. These include the rules and regulations set out in this document in addition to the Council's financial procedure rules and regulations.

15.2 Managers must ensure that adequate levels of internal checks are included in working procedures, particularly financial procedures. It is important that duties are organised in such a way that no one person can carry out a complete transaction without some form of checking or intervention process being built into the system.

## 16 **Prevention of Bribery, Fraud and Corruption – Staff Selection/Screening**

16.1 The Council's recruitment procedures ensure that the Council appoints employees on merit and prevents the appointment of unsuitable people.

16.2 Applicants complete an application form and must declare any criminal convictions that are not spent. Where appropriate, and where the type of post requires it, applicants may also be subject to criminal record and vetting checks.

16.3 The Council appoints employees subject to satisfactory written references.

16.4 The Council conducts documentary checks on all new employees to ascertain their eligibility to employment in accordance with the Asylum & Immigration Act 1996 s.8 (as amended).

## 17 **Prevention of Bribery, Fraud and Corruption – Contractors and those Delivering Services for the Council**

17.1 The Council will ensure that all contracts conform to the highest standards possible. The Council will act to ensure that those organisations that work

with the Council to deliver services are made aware of the Council's strong anti-bribery, fraud and corruption principles, including their Whistleblowing Policy.

- 17.2 Where appropriate the Council may exclude suppliers, contractors and service providers from public contracts following conviction for certain offences including participation in criminal organisations, fraud, corruption, bribery or money laundering.
- 17.3 The Council will seek an assurance that those tendering to provide supplies, goods, services and works to the Council have adequate anti-bribery, fraud or corruption recruitment procedures and controls in place; have not colluded with others during the tendering process; or canvassed or solicited any Member or employee of the Council in connection with the award or future award of contracts.
- 17.4 In awarding any contract, the Council will act in accordance with its Contract Rules.
- 17.5 Within its contract terms, the Council may exercise a right to terminate a contract and recover losses if there is evidence of bribery, fraud or corruption in connection with a Council contract by the contractor, its employees or anyone acting on the contractor's behalf.
- 17.6 The Council may seek the strongest available sanctions against the contractor, their employees or anyone acting on behalf of the contractor who commits bribery, fraud or corruption against the Council and will request that the organisation concerned takes appropriate action against any individual concerned.
- 17.7 Where contractors are involved with the administration of Council finances, or those for which the Council has responsibility, the Council will conduct internal audit reviews and pro-active anti-bribery, fraud or corruption exercises as part of the contract management process.

## **18 Prevention of Bribery, Fraud and Corruption –Collaboration with Outside Agencies and Other Bodies**

- 18.1 Given the nature of the Council's work, the nature and scope of bribery, fraud or corruption can vary and involve different bodies. Therefore, the Council may need to liaise with and undertake joint working with certain agencies, including (but not limited to):
  - any Council owned companies;
  - other local authorities;
  - benefits agencies;
  - the Serious Fraud Office;

- the Police;
- the Home Office; and
- the UK Border Agency.

18.2 The Council commits to working and co-operating with other organisations to prevent organised bribery, fraud or corruption. Wherever possible and where lawful to do so, the Council will assist and exchange information with other appropriate bodies to investigate and combat bribery, fraud and corruption.

## 19 Detection and Investigation

19.1 The range of preventative systems within the Council, particularly internal control systems, can provide indicators of bribery, fraud or corruption (and error) and can help to detect any inappropriate activity.

19.2 Senior managers have responsibility for preventing and detecting bribery, fraud or corruption. Often, the alertness of others enables the detection of wrongdoings and appropriate action to take place when evidence suggests that bribery, fraud or corruption may be taking place.

19.3 Despite the best efforts of managers and auditors, many irregularities are discovered by chance. The Council has arrangements in place to deal with such discoveries. Some frauds may be discovered as a result of whistleblowing.

19.4 The Council's Whistleblowing Policy encourages people to raise serious concerns. Employees reporting concerns are afforded certain rights and protection through legislation enacted under the Public Interest Disclosure Act 1998.

19.5 The Council will support employees who report concerns and will make every effort to protect them from reprisals. The Council will do everything possible to protect their confidentiality.

19.6 A duty exists to report any suspected cases of bribery, fraud or corruption. Reporting cases in accordance with this Policy and the Whistleblowing Policy is essential and:

- ensures the consistent treatment of information regarding bribery, fraud or corruption;
- facilitates the proper investigation of suspected cases; and
- protects the interests of individuals and the Council.

19.7 This process will apply to allegations of bribery, fraud or corruption relating to the following areas:

- by Members or co-optees;

- internal fraud and other bribery, fraud or corruption by Council employees acting in a personal capacity;
- by contractors or their employees; and
- external bribery, fraud or corruption (the public).

19.8 The external auditor also has powers to independently investigate bribery, fraud or corruption.

19.9 The Council will treat all information received confidentially. The Council will not disclose or discuss investigation results with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of people suspected but subsequently found innocent of wrongful conduct and to protect the Council from potential civil liability. Any processing of personal data will comply with the Data Protection Act, the General Data Protection Regulation and the data protection principles.

19.10 The Council's Communications team may use the press to report the outcome of any action taken, including prosecutions.

19.11 The Council will publish this Policy and any review of it to make employees, Members, co-optees, contractors, partners and the public aware of the Council's commitment to taking action on bribery, fraud or corruption when it occurs.

## 20 Courses of Action

20.1 Mechanisms exist within the Council to act in cases of bribery, fraud or corruption. These include the following:

- **Disciplinary action:** gross misconduct and other fraudulent or corrupt conduct will normally lead to dismissal. The Council's disciplinary procedure provides further information.
- **Prosecution:**
  - the Council will seek full redress through the legal processes available to counter any internal or external fraudulent activities perpetrated against it. This redress will be achieved through criminal and/or civil courts as considered appropriate;
  - the Chief Executive, in consultation with the Section 151 Officer, the Monitoring Officer, human resources, the Corporate Investigation Team and other external agencies as appropriate, will decide whether to refer the case to the police for prosecution. Other external agencies involved may include the Department for Works and Pensions and the Crown Prosecution Service;
  - the Council will take all reasonable action to recover any money or goods.

- 20.2 Failure to comply with the Bribery Act 2010 could result in imprisonment of up to 10 years and/or unlimited fines without taking into account the severe reputational repercussions for the Council.
- 20.3 A statutory defence to the strict liability offence of 'failing to prevent bribery' is the introduction of internal adequate procedures. For the Council this includes:
- the appointment of the Council's Monitoring Officer to deal with all matters relating to bribery and corruption;
  - management commitment to a zero tolerance culture to bribery and corruption. The Council will not accept any level of corruption, and all cases identified will be thoroughly investigation and dealt with appropriately;
  - accessible and enforceable policies and procedures;
  - a regulatory framework aimed at preventing and detecting corruption; and
  - relevant staff are trained on how to spot and prevent potential bribery.

## **21 Awareness and Training**

- 21.1 Introducing and implementing a successful Anti-Bribery, fraud and Corruption Policy is dependent largely on the awareness and responsiveness of those working in and with the Council.
- 21.2 The Investigation Team will make Members, co-optees and employees aware of this Policy initially via the induction process and will remind them of this Policy via Council publications.
- 21.3 The Council supports the concept of bribery, fraud and corruption awareness training for Members, co-optees and employees to ensure that their responsibilities and duties in respect of anti-bribery, fraud and corruption are current and their understanding reinforced.
- 21.4 The Investigation Team also commits to training and developing staff who are involved in investigating bribery, fraud or corruption and will provide suitable training where necessary.
- 21.5 The Procurement Team will act to ensure that those organisations that work with the Council to deliver services are made aware of the Council's strong anti-bribery, fraud and corruption principles, including their Whistleblowing Policy.

## **22 Review of this Policy**

- 22.1 This policy will be reviewed one year from its adoption and thereafter every three years



## **23 Monitoring of this Policy**

- 23.1 The Monitoring Officer will decide when this Policy needs review in light of any change of legislation or Council Policy if this is before the scheduled review date.
- 23.2 The Audit and Governance Committee has responsibility for the overview of this Policy. The Monitoring Officer, in consultation with the Chief Executive, the Section 151 Officer, and the Chair of the Audit and Governance Committee will ensure that any corrective actions identified from investigations are brought to the attention of the relevant committee.

## **24 Conclusion**

- 24.1 The Council commits to the development of an anti-bribery, fraud and corruption culture and will not tolerate bribery, fraud or corruption.
- 24.2 Bribery, fraud or corruption, where it is detected, will be dealt with promptly, investigated fairly, and where appropriate, prosecuted to the fullest extent that the law allows. In certain matters, depending on the nature of the circumstances, alternative sanctions may, on agreement, be deemed appropriate.
- 24.3 This document seeks to state the positions of the Council and its intent regarding all bribery, fraud or corruption matters that may affect the Council.

## **25 Ownership**

- 25.1 The Investigation Manager has overall responsibility for the maintenance and operation of this Policy and will liaise as necessary with the Chief Executive, the Monitoring Officer, The Head of Finance, the Section 151 Officer and the Internal Auditor.

**THIS POLICY WAS APPROVED BY OXFORD CITY COUNCIL'S AUDIT AND GOVERNANCE COMMITTEE ON:**

**POLICY UPDATED: March 2019**

**POLICY REVIEW DATE: March 2020**

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