

To: Audit and Governance Committee

Date: 16th April 2012

Item No:

Title of Report:

Annual Review of the Avoiding Bribery, Fraud and Corruption Policy, the Money Laundering Policy and Procedure and the Whistle blowing Policy.

Summary and Recommendations

Purpose of report:

To acknowledge the annual review of the policies and endorse any changes within the policies.

Key Decision: No

Board member: Councillor Bob Price

Scrutiny Responsibility: Value & Performance

Ward(s) affected: None

Policy Framework: None

Recommendation(s): Members are asked to note the annual review of the Avoiding Bribery Fraud and Corruption Policy, the Money Laundering Policy and the Whistle blowing Policy.

1. Introduction

1.1 The Audit and Governance Committee endorsed the Council's Avoiding Bribery, Fraud and Corruption Policy on 30th June 2011. The policy was updated at that time ensuring the Council had adequate bribery prevention procedures in place in light of the Bribery Act which came into force on 1st July 2011.

1.2 The revised Money Laundering Policy and Procedures was endorsed by Audit and Governance Committee on 30th June 2009. The Policy incorporates reporting procedures for all members of staff to follow. Whilst the risk of contravening the legislation is low, it is extremely important that all employees are familiar with their legal responsibilities.

1.3 The Council's Whistle Blowing Policy (Part 25 of the Constitution) encourages officers to blow the whistle within the Council and protects the whistle blower from reprisals. The Policy was reviewed by Law and Governance in May 2011, the Standards Committee made no amendments to the Policy at the Committee meeting held on 9th September 2011.

2. Policy Review

2.1 All policies have been reviewed.

2.2 There has been a minor change to section 10 of the Avoiding Bribery, Fraud and Corruption Policy. Reference is made to housing fraud and the tenancyfraudline@oxford.gov.uk email address.

2.3 There have been no changes made to the Money Laundering Policy, Procedures and Reporting Form

2.4 There have been no changes made to the Whistle blowing Policy. Under this procedure, the Chief Finance Officer is required to report the number of whistle blowing complaints (if any) to the Audit & Governance Committee. Arrangements are now in place to record the data centrally on iTrent, the Council's Employee and Payroll System. Only the actual whistle blowing complaint is recorded where;

- the officer making the complaint states they are using the whistle blowing procedure
- they put the concern in writing

3. Fighting Fraud

3.1 The 3 policies are now grouped on the intranet and can be found at;

<http://occweb/intranet/finance.cfm>

The Finance site now shows the following;

Fighting Fraud

These policies give assurance that the Council supports a zero tolerance attitude in regard to bribery fraud and corruption and an assurance to protect the public funds it administers. There are policies in place to report, investigate and resolve any 'discrepancies'. The policies also give assurance that the Authority is compliant to the law.

The [Avoiding Bribery Fraud and Corruption Policy](#) is a clear statement of intent to eliminate all forms of bribery fraud and corruption and the responsibility to investigate and report all alleged irregularities.

The Council's [Whistle Blowing Policy \(Part 25 of the Constitution\)](#) encourages officers to blow the whistle within the Council and protects the whistle blower from reprisals.

The [Money Laundering Policy, Procedure](#) and [Reporting Form](#) is the internal process required by law to prevent the Council's services, employees and elected members from being used to launder money. There is a responsibility to report any concerns regarding money laundering or any attempt to launder money.

Recommendations

Members are asked to note the review of the attached Policies.

Appendix 1 - Avoiding Bribery Fraud and Corruption Policy

Appendix 2 - The Money Laundering Policy

Appendix 3 - The Money Laundering Procedure

Appendix 4 - The Money Laundering Reporting Form

Appendix 5 - The Whistle blowing Policy

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