

Report to Audit Committee

Subject: Anti-Fraud and Corruption Strategy

Date: 23 June 2026

Author: Chief Finance Officer and Section 151 Officer

Purpose

To present the Anti-Fraud and Corruption Strategy and its supporting appendices, including the Whistleblowing Policy Summary, Fraud Response Plan, Anti-Fraud and Corruption Action Plan 2026-27 and Anti-Money Laundering Policy, for review and approval by the Audit Committee.

Recommendation(s)

THAT:

1. The Audit Committee reviews the Anti-Fraud and Corruption Strategy and its supporting appendices and recommends to Cabinet for approval.
2. The Committee notes that the strategy provides an updated corporate framework for preventing, detecting, investigating and responding to fraud, bribery, corruption and wider economic crime.
3. Audit Committee recommends that Cabinet give to the Chief Finance Officer, in consultation with the Monitoring Officer, to make minor amendments to reflect legislative, organisational or operational changes to the documents.

1 Background

- 1.1 The Council has a statutory and fiduciary responsibility to safeguard public funds, assets and governance arrangements and to maintain proportionate and effective counter fraud controls.
- 1.2 The Anti-Fraud and Corruption Strategy has been refreshed to align with CIPFA good practice, Fighting Fraud and Corruption Locally and the relevant legislative framework, including the Economic Crime and Corporate Transparency Act 2023. It has also been updated following recommendations arising from the Internal Audit review in order to

strengthen the Council's counter fraud framework and supporting arrangements.

- 1.3 The refreshed framework reflects:
- the CIPFA Code of Practice on Managing the Risk of Fraud and Corruption
 - the Council's zero-tolerance approach to fraud, bribery, corruption and wider economic crime
 - the reasonable procedures themes associated with the failure to prevent fraud offence effective from 1 September 2025
 - supporting appendices covering whistleblowing, fraud response, a 2026-27 action plan and anti-money laundering arrangements.
- 1.4 The strategy forms part of the Council's wider governance and assurance framework and supports Audit Committee oversight of fraud risk, counter fraud arrangements and continuous improvement.

2 **Proposal**

- 2.1 The Anti-Fraud and Corruption Strategy sets out the Council's corporate framework for preventing, detecting, investigating and responding to fraud, bribery, corruption and wider economic crime.
- 2.2 The strategy promotes a risk-based approach built around:
- strong leadership and a clear tone from the top
 - fraud risk assessment and proportionate controls
 - due diligence, secure systems and effective reporting routes
 - proactive counter fraud activity, proper investigation and organisational learning
 - monitoring, assurance and regular review through the governance framework
- 2.3 The strategy is supported by appendices comprising a Whistleblowing Policy (which is a separate policy document on tonight's agenda), a strengthened Fraud Response Plan, an Anti-Fraud and Corruption Action Plan 2026-27 and an Anti-Money Laundering Policy, providing a clearer framework for prevention, response, assurance and continuous improvement.
- 2.4 The Fraud Response Plan strengthens the Council's arrangements for handling allegations or suspicions of fraud, bribery, corruption or related irregularity by setting out the immediate actions to be taken, the escalation routes, the roles of key officers, the need to secure evidence and records promptly, and the approach to investigation, referral, recovery and

organisational learning. It is intended to support a prompt, proportionate and well-governed response and to ensure that matters are handled consistently and fairly.

- 2.5 The Anti-Fraud and Corruption Action Plan 2026-27 translates the strategy into a practical programme of improvement and assurance activity. It sets out specific actions, lead responsibilities, target measures, timescales and RAG status across the key themes of leadership and governance, fraud risk assessment, reasonable procedures, third-party due diligence, awareness and training, data-led proactive work, whistleblowing and reporting, and monitoring and assurance. This provides a clear basis for management oversight, Senior Leadership Team discussion and Audit Committee reporting during the year.
- 2.4 Approval of the strategy and its supporting appendices will provide assurance that the Council has an up-to-date and coherent counter fraud framework aligned with current legislation, professional good practice and organisational expectations, together with a practical response plan and monitored improvement programme for 2026-27.

3 Alternative Options

- 3.1 Do nothing and retain the existing Strategy – this is not recommended as it may not reflect current risks or best practice.
- 3.2 Produce a partial update – this has been discounted in favour of a full refresh to ensure consistency and clarity.

4 Financial Implications

- 4.1 There are no direct additional financial implications arising from approving the revised Strategy.
- 4.2 Effective counter-fraud arrangements contribute to financial resilience by preventing losses and protecting public funds.
- 4.3 Any resource implications arising from enhanced activity will be managed within existing budgets.

5 Local Government Reorganisation Implications

- 5.1 The Strategy provides a consistent framework that can support any future local government reorganisation arrangements.
- 5.2 It ensures alignment of counter-fraud principles across potential new organisational structures.
- 5.3 The approach supports resilience and continuity of governance arrangements.

6 Legal Implications

- 6.1 The strategy supports the Council's wider governance responsibilities and reflects the relevant legal framework, including the Public Interest Disclosure Act 1998, Proceeds of Crime Act 2002, Fraud Act 2006, Bribery Act 2010 and the Economic Crime and Corporate Transparency Act 2023.
- 6.2 It also aligns with the CIPFA Code of Practice on Managing the Risk of Fraud and Corruption and Fighting Fraud and Corruption locally, and reflects the reasonable procedures themes associated with the failure to prevent fraud offence that came into force on 1 September 2025.
- 6.3 The Monitoring Officer has been consulted in the preparation of the strategy and supporting documents.

7 Equalities Implications

- 7.1 There are no direct adverse equalities implications arising from this report. Clear reporting routes and a speak-up culture help ensure concerns can be raised appropriately by staff and others acting on behalf of the Council.
- 7.2 The supporting arrangements include whistleblowing and reporting routes intended to be accessible, clear and supportive of concerns raised in good faith.

8 Carbon Reduction/Environmental Sustainability

- 8.1 There are no direct environmental implications arising from this report.

9 Appendices

9.1 Appendix 1 - Whistleblowing Policy Summary;

Appendix 2 - Fraud Response Plan;

Appendix 3 - Anti-Fraud and Corruption Action Plan 2026-27;

Appendix 4 - Anti-Money Laundering Policy

Statutory Officer approval

Approved by: Chief Finance Officer

Date: 11 June 2026

Approved by: Monitoring Officer

Date: 11 June 2026