

**Anti-Fraud and Corruption Strategy
Three Rivers District Council
Watford Borough Council**

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1. Policy Statement

Three Rivers District Council and Watford Borough Council (the Councils) take their duty to protect public funds very seriously and are committed to a zero tolerance approach to fraud and corruption from both internal and external sources.

Any loss of funds to fraud affects the Councils ability to maintain high levels of service to their communities.

Fraud and corruption can lead to lasting reputational damage.

All Members and employees of the Councils should ensure the highest standards of stewardship of public funds.

The detection, prevention and reporting of fraud, bribery and corruption is the responsibility of all Members, employees (including casuals, temporary and agency staff), partners, and contractors of the Councils.

2. Introduction

The Councils are committed to promoting a strong anti-fraud and corruption culture.

This Anti-Fraud and Corruption Strategy is the mechanism for achieving this commitment and aims to reduce losses to fraud and corruption to a minimum.

There are a number of controls in place that individually and collectively contribute to effective control environments at both Councils, and therefore to the prevention, detection, and investigation of fraud and corruption.

Features of the control environment include:

- Sound systems of financial management
- Effective and well-documented internal controls
- Accountability through clear roles and responsibilities throughout the Councils
- Effective communication systems, both within the Councils and external to them
- Effective use of technology
- Effective budgetary control and performance monitoring systems
- Effective internal audit
- Sanctions Policy

All Members and employees are required to comply with the following interrelated policies and procedures:

- Council Constitution and Financial Procedure Rules
- Officers and Members Codes of Conduct
- Disciplinary Policy
- Whistleblowing Policy
- Money Laundering Policy
- Bribery Policy
- Contract Procedure Rules

3. Fraud, Bribery and Corruption

Fraud

The intentional distortion of financial statements or other records by persons internal or external to the organisation which is carried out to conceal the misappropriation of assets or otherwise for gain. Put simply, fraud is an act of deception intended for personal gain or to cause a loss to another party.

The Fraud Act 2006 defines fraud in three categories:

- False representation
- Failure to disclose information where there is a legal duty to do so
- Abuse of position

Bribery

An inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage". The Bribery Act 2010 contains the following four categories of offence and, whilst it was updated in May 2013, these categories of offence remained unchanged:

- Offering, promising or giving a bribe to another person
- Requesting, agreeing to receive or accepting a bribe from another person
- Bribing a foreign public official
- A corporate offence of failing to prevent bribery

Corruption

The offering, giving, soliciting or acceptance of an inducement or reward, which may influence the action of any person.

4. Strategic Approach

In developing this Policy, we have adopted the guiding principles included in "Fighting Fraud and Corruption Locally 2020" (FFCL2020) which is the counter fraud and corruption strategy for local government. It provides a blueprint for a coordinated response to fraud and corruption perpetrated against local authorities with the support of those at the top.



Achieving our Objectives

Govern

The bedrock of the Strategy is that those who are charged with Governance support the activity by ensuring that there are robust arrangements and executive support to ensure anti-fraud, bribery and corruption measures are embedded throughout the organisation.

Beating fraud is everyone's business, and the Councils internal arrangements are communicated throughout the Councils, and publicly, demonstrating a culture and commitment to preventing fraud.

The Councils have a number of robust procedures and policies in place, which combined with executive support ensure that anti-fraud, bribery and corruption measures are embedded throughout the Councils.

This acts as an effective deterrent to fraudulent and corrupt activity and provides the means for reporting, detecting and preventing fraud, bribery or corruption.

Having a holistic approach to tackling fraud is part of good governance.

Acknowledge

In order to create a counter-fraud response, the Councils must acknowledge and understand fraud risks and then demonstrate this by committing the right level of resource to preventing and detecting fraud, bribery and corruption, and investigating any occurrences when found or reported.

The Councils maintain and evaluate risk registers.

The Councils have a dedicated Fraud Team with responsibility for investigation all allegations of fraud, bribery or corruption.

This ensures the Councils are effective in protecting the public purse and fighting economic crime, and heightens the Councils fraud resilience.

Reactive referrals are a primary source of work and provide good leads. It is often the alertness of the public and employees that generate these referrals and enables detection of fraud, bribery or corruption to occur.

Prevent

Fraud can be prevented and detected by enhancing fraud controls and processes, making better use of information and technology and developing a more effective anti-fraud culture.

The Councils have a statutory responsibility under Section 151 of the Local Government Act 1972 to ensure that proper arrangements are made for the Council's financial affairs. In addition, under the Accounts and Audit (England) Regulations, the Councils are required to maintain an adequate and effective internal audit of all its financial records and systems of internal control. Therefore the councils have implemented sound financial systems and procedures which incorporate efficient and effective internal controls.

In addition to the above responsibilities and requirements the Councils have a number of controls and policies and procedures in place as outlined in section 2.

The Councils promote an anti-fraud culture across both the Councils and the community by publicising the impact of fraud on the community.

Employees, Members, public, service users, partners, suppliers, contractors and consultants can raise any concerns via the confidential fraud hotline or online.

All employees are required to undertake mandatory training which includes;

- Fraud, Anti-fraud, Corruption and Money Laundering Awareness
- Code of Conduct
- Cyber Crime and Cyber Security
- Information Security
- Data Protection Act 2018 - GDPR

The Councils participate in national data matching exercises coordinated by the Cabinet Office (National Fraud Initiative) as well as using data analytics and new technology to combat fraud.

The Councils are members of the National Anti-Fraud Network (NAFN) who provide an extensive range of data and intelligence services to local authorities. NAFN also provides regular intelligence alerts providing information about fraud, risks and trends which may affect members.

Where appropriate the Fraud Team disseminate information, and alerts, regarding emerging and new fraud risks throughout the Councils.

Additionally the team are the single point of contact in respect of intelligence enquiries, and data sharing, for law enforcement agencies, the Department for Work and Pensions (DWP), Her Majesties Revenues and Customs (HMRC), other local authorities and government departments.

While prevention is one of the most important objectives of the Strategy, it is appropriate to also focus efforts on detection, and encourage the reporting of suspected cases of fraud, bribery and corruption from both within the Councils and from external sources.

Pursue

Stopping fraud and corruption from happening in the first place must be our primary aim. However, those who keep on trying may still succeed. It is, therefore, essential that a robust enforcement response is available to pursue fraudsters and deter others.

The Councils will always seek the strongest possible sanction against any individual or organisation that defraud or attempt to defraud the Councils. Any decision to take legal action against offenders is made in accordance with the Councils Sanctions Policy.

A further element of the Council's response to tackling fraud is seeking financial redress. The recovery of defrauded monies is an integral part of the Strategy, and action will be taken to recover losses. Where criminality has been proven then the Proceeds of Crime Act 2002 can be used to recover funds.

Other methods of recovery may include, but are not confined to, civil proceedings; unlawful profit orders and compensation orders, bankruptcy if it is believed the individual has a poor history of paying and recovery from future salary payments.

The Councils Fraud Team are responsible for the detection, investigation, pursuit and prosecution of those responsible of committing fraud against the Councils.

And where appropriate they work jointly with, or assist; law enforcement agencies, the Department for Work and Pensions (DWP), Her Majesties Revenues and Customs (HMRC), other local authorities and government departments, in the investigation, pursuit, and prosecution of offenders.

Protect

The Councils are committed to protecting public funds by protecting the Councils against serious and organised crime, fraud and cyber-crime, and from future frauds. The Councils are also committed to protecting individuals from becoming victims of crime and protecting against the harm that fraud can do to the community.

This theme lies across the pillars of this Strategy

5. Who to Contact

Fraud

Allegations of Council Tax Reduction fraud, Council Tax frauds, Blue Badge fraud, Community Infrastructure Levy fraud, Grant Fraud, Business Rates, etc. are referred to the Fraud Team by email, or phone.

Customers, suppliers, contractors, stakeholders and members of the public can also report concerns online at www.threerivers.gov.uk or www.watford.gov.uk or via the confidential Fraud Hotline 0800 458 9200 or by email fraud@threerivers.gov.uk or fraud@watford.gov.uk.

Allegations of state benefit fraud are referred to the DWP

It is important to remember it is better to be proved wrong over genuine concerns than keep quiet and be proved right when fraud later comes to light.

Whistleblowing

The Whistleblowing Policy is intended to encourage and enable staff to raise serious concerns within the Councils. Whistleblowing can be used for confidential reporting, to report any concern relating to possible fraud, bribery, corruption, misconduct or mal-practice/administration. We will treat all concerns or suspicions with discretion and in confidence.

Whilst intended primarily for Council employees, the reporting arrangements set out in the Whistleblowing Policy are also open to any member of the public, elected Member or representative of any organisation associated with either Council. The Councils also have Complaints Procedures which may be followed by members of the public.

Employees reporting concerns in this way are afforded certain rights under the Public Interest Disclosure Act 1998. See Whistleblowing Policy for full details.

Concerns should be reported to either: the Chief Executive (Three Rivers), the Chief Executive (Watford) or the Director of Finance. These officers will decide the most appropriate method for dealing with the concern.

A whistleblower may call the confidential Fraud Hotline (0800 458 9200) or contact the Fraud Team, if that is easier for them.

The Councils have the resources and expertise to investigate any concern internally. If a whistleblower feels it right to raise the matter externally, or have raised it internally but feel that it has not been properly investigated, there are a number of possible contact points including; Elected Members, the External Auditor and the Police, see Whistleblowing policy for full list.

Bribery

The Councils are committed to the prevention, deterrence and detection of bribery. We have zero-tolerance towards bribery. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all staff including temporary agency staff, contractors, Members, volunteers and consultants. All staff and members are required to avoid activity that breaches this policy.

Employees should normally report any concerns to their immediate manager for the matter to be dealt with. Line Managers must not investigate any suspected case of bribery but must refer it immediately to the Director of Finance, the Chief Executive (Three Rivers District Council) or the Chief Executive (Watford) who will decide what further action is to be taken.

If employees feel unable to do this, e.g. they feel that their manager may be implicated or they have already done so but do not feel that the matter has been properly dealt with; they can then use the whistleblowing process to report any concern.

Money Laundering

The Councils are committed to the prevention of money laundering and to working with the appropriate authorities to apprehend those who commit offences under the anti-money laundering regulations.

Money Laundering is generally defined as the process by which the proceeds of crime and the true ownership of those proceeds are changed so that the proceeds appear to come from a legitimate source.

The Money laundering Policy applies to all Council staff and to elected Members. The key requirement for staff is to report any suspected money laundering activity to the Money Laundering Reporting Officer (MLRO). In the case of both Councils the MLRO is the Director of Finance.

See the Councils Money Laundering Policy for full details.

6. Conclusion

By adopting this Strategy the Councils will manage the risk of fraud, bribery and corruption by:

- Developing and maintaining a culture in which fraud and corruption are unacceptable
- Understand the harm that fraud can do in the community
- Understanding our fraud risk
- Preventing fraud more effectively
- Using technology to improve our response
- Sharing information and resources more effectively
- Better detecting fraud loss
- Bringing fraudsters to account more quickly and efficiently
- Improving the recovery of losses
- Protecting those at risk.

This policy should be read in conjunction with the Councils Sanctions Policy, Anti-Bribery Policy, Whistleblowing Policy and Anti-Money Laundering Policy.

Appendix 1

Three Rivers District Council and Watford Borough Council Sanctions Policy

Introduction

The Rivers District Council and Watford Borough Council (the Councils) are committed to preventing fraud and corruption and have developed an Anti-Fraud and Corruption Strategy in order to minimise its occurrence. This Sanctions Policy forms part of this strategy and sets out the Councils policy towards sanctions, including criminal prosecutions, relating to offences committed by both internal (e.g. employees, members, contactors, etc.) and external offenders.

Due to the high risk of fraud the Councils are committed to protecting the public funds they administer through the prevention, detection, deterrence and investigation of fraud. This includes:

- Internal fraud
- Council Tax Reduction fraud
- Council Tax Discounts and Exemptions Fraud
- Council Tax evasion Fraud
- Disability Facility Grants Fraud
- Business Rate Fraud
- Community Infrastructure Levy fraud
- Blue Badge Fraud
- Residents parking Fraud
- Grant Fraud
- Housing

This policy will govern the use of all sanctions available to the Councils and will apply to any fraud against the Councils, and the public funds they administer.

The objectives of this policy are to:

- Ensure sanctions are imposed in a just and consistent manner.
- Ensure that the sanction decision-making process is stringent, robust and transparent.
- Ensure that sanctions are applied cost-effectively and with efficiency.

The Councils Fraud Team are responsible for investigation of allegations of fraud within the Councils.

The Fraud Manager is responsible for ensuring investigations into suspected fraud are conducted professionally in accordance with the:

- Police and Criminal Evidence Act 1984 (PACE),
- Criminal Procedures in Investigations Act 1996 (CPIA),
- Regulatory Investigators Power Act 2000 (RIPA).
- Data Protection Act 2018.
- IPA 2016.
- Human Rights Act 1998.

Each case is unique and will be considered on its facts and merits. Investigators must be fair, independent and objective. They must not let any political views or personal views about the ethnic or national origin, sex, religious beliefs, disability or the sexual orientation of the suspect, victim or witness influence their decisions. They must not be affected by improper or undue pressure from any source.

Where necessary, the Fraud Team will work with other departments within the Council, and in co-operation with other organisations such as the Police, Department for Work and Pensions (DWP), Home Office, Her Majesty's Revenue and Customs (HMRC), and other Local Authorities. Also Financial Investigators may be used and/or the Police in situations where their additional powers are required to secure evidence, or recovery of funds, or where the matter cannot be adequately pursued by the Councils.

Sanctions

A range of sanctions are available to the Councils, these include:

- Prosecution
- Official cautions
- Financial penalties for Council Tax Reduction Scheme fraud
- Disciplinary action
- Civil proceedings

In some cases more than one form of sanction may be appropriate. For example if a member of staff has defrauded the Councils, it may be appropriate to consider disciplinary, prosecution, and criminal or civil recovery action, depending on the circumstances.

It is the policy of the Councils that where there is prima facie evidence that a criminal offence has been committed then the case will be referred for prosecution.

The sanction decision will have regard at all times to the Councils Anti-Fraud & Corruption Strategy, the individual circumstances of each case and the overall impact of the punishment to both the individual and the community.

Prosecution

One sanction available to the Councils is a criminal prosecution. We recognise that this is a serious step to take, and the decision to refer cases for prosecution will not be taken lightly.

The ultimate decision on prosecution will be made by the relevant prosecuting body.

Any matters considered for prosecution will be subject to **the Code for Crown Prosecutors**; the evidential test and the public interest test, and each case will be considered on its own merits.

The Code for Crown Prosecutors is a public document, issued by the Director of Public Prosecutions that sets out the general principles Crown Prosecutors should follow when they make decisions on cases.

Formal Caution

A Formal Caution is an oral warning (of which a written record is made), given in certain circumstances to a person who has committed an offence.

A caution can be considered when:

- There is sufficient evidence to justify instituting criminal proceedings;
- The person has admitted the offence during an interview under caution and agrees to the caution.
- The offence is not considered to be of a serious nature and/or any loss to the Councils is low enough that it may not be in the public interest to prosecute.
- There are no previous convictions or cautions for fraud.
- There was no other person involved in the fraud.

If the person is subsequently prosecuted for another fraud offence, the caution may be cited in court.

Financial penalties for Council Tax Reduction Scheme fraud

A Financial Penalty can be offered as an alternative to prosecution for cases of Council Tax Reduction Scheme fraud. The amount of penalty that can be offered is set by legislation.

An offer of a Financial Penalty as an alternative to prosecution can be considered when:

- There is sufficient evidence to justify instituting criminal proceedings.
- There has been an overpayment due to the alleged fraud, or there has been an alleged attempt to fraudulently claim a Council Tax Reduction.
- The offence is not considered to be of a serious nature and/or the overpayment is low enough that it may not be in the public interest to prosecute.
- There are no previous convictions, cautions, or Financial Penalties for fraud

If the person offered the penalty refuses to accept it criminal proceedings will be instituted.

The Penalty is payable in addition to any Council Tax Reduction overpayment and any failure to repay the debt may result in civil proceedings being taken.

If the person is subsequently prosecuted for another fraud offence, the Financial Penalty may be cited in court.

Employee Fraud and Corruption

In all cases of fraud, theft, financial misconduct, serious and intentional breach of financial regulations, and corruption committed by officers, members, contactors or organisations (e.g. suppliers, service providers, etc) we will seek action.

In addition to disciplinary action the Councils will consider all the available sanctions, including prosecution. Where a case is considered suitable for prosecution we will refer the case to the relevant prosecuting body.

Where a financial loss has been identified, we will always seek to recover this loss either through civil or criminal proceedings.

Other Fraud

In the event of any fraud against the Councils not explicitly mentioned in this policy, the Councils will consider all the available sanctions, including prosecution. This will also include cases of attempted fraud, e.g. false applications for services.

In cases where the Council suffers a financial loss, we will always seek recovery.

Working in Partnership with other Agencies

The Council may investigate cases involving state benefits jointly with the DWP, in these cases prosecutions will be carried out by the Crown Prosecution Service, and any penalties will be issued by agreement with the DWP.

Where necessary, the Council will also work closely with other organisations such as the Police, Home Office, HMRC, and other local authorities in order to develop and promote an anti-fraud culture and to further prevent, detect and deter fraud.

This policy should be read in conjunction with the Council's Anti-Fraud and corruption policy, Anti-Bribery Policy, Whistleblowing Policy, and Anti-Money Laundering Policy.

Conclusion

The Councils will seek to deter fraud via the pursuit of prosecution or the imposition of Financial Penalties and Formal Cautions in cases where all the criteria has been met. The criteria that have been established are designed to ensure that the correct cases are brought to court, and that the Council acts in a positive way to actively deter the genuine and deliberate fraudster.

**THREE RIVERS DISTRICT COUNCIL
WATFORD BOROUGH COUNCIL
ANTI-BRIBERY POLICY**

1. Introduction Policy Statement

Bribery is a criminal offence. Three Rivers District Council and Watford Borough Council (the Councils) do not, and will not, pay bribes or offer improper inducements to anyone for any purpose nor do they or will they accept bribes or improper inducements.

To use a third party as a conduit to channel bribes to others is a criminal offence. The Councils do not, and will not, engage indirectly in or otherwise encourage bribery.

The Councils are committed to the prevention, deterrence and detection of bribery. We have zero-tolerance towards bribery. We aim to maintain anti-bribery compliance as business as usual, rather than as a one-off exercise.

2. Aims

This policy provides a framework to enable employees and Members to understand and implement arrangements enabling compliance.

We require all staff, including temporary agency staff and all contractors and their employees working on behalf of the Councils and all elected members to:

- Act honestly and with integrity at all times and to safeguard the Councils resources for which they are responsible.
- Comply with the spirit, as well as the letter, of the laws and regulations in respect of the lawful and responsible conduct of activities.

3. Scope

This policy applies to all of the Councils functions. For Members, partners, joint ventures and suppliers, we will seek to promote the adoption of policies consistent with this policy. Within the Councils the responsibility to control the risk of bribery occurring rests at all levels. This policy covers all staff including temporary agency staff, contractors, Members, volunteers and consultants. The Councils commit to:

- Setting out a clear anti-bribery policy and keeping it up to date
- Making all employees and members aware of their responsibilities to adhere strictly to this policy at all times
- Enabling all employees and members to recognise and avoid the use of bribery by themselves and others
- Encouraging its employees and Members to be vigilant and to report any suspicions of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged bribery
- Taking firm and vigorous action against any individual(s) involved in bribery
- Providing information to all employees and Members on how to report breaches and suspected breaches of this policy

4. What is Bribery?

Bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage.

The Bribery Act

<http://www.legislation.gov.uk/ukpga/2010/23/contents>

There are four key offences under the Act:

- Bribery of another person (section 1)
- Accepting a bribe (section 2)
- Bribing a foreign official (section 6)
- Failing to prevent bribery (section 7)

The Bribery Act 2010 makes it an offence to offer, promise or give a bribe (Section 1). It also makes it an offence to request, agree to receive, or accept a bribe (Section 2). Section 6 of the Act creates a separate offence of bribing a foreign public official with the intention of obtaining or retaining business or an advantage in the conduct of business.

There is also a corporate offence under Section 7 of failure by a commercial organisation to prevent bribery that is intended to obtain or retain business, or an advantage in the conduct of business, for the organisation. This is what is known as a strict liability offence. This means that there is no need to prove negligence or management complicity. An organisation will have a defence to this corporate offence if it can show that it had in place adequate procedures designed to prevent bribery by or of persons associated with the organisation.

Are the Councils commercial organisations

The Councils are commercial organisations in all of their financial and contractual activity including those activities or services undertaken on their behalf.

5. Anti-Bribery Procedures

The Councils procedures cover six principles.

Proportionality

The Councils have procedures in place to prevent bribery by persons associated with it. These are proportionate to the bribery risks faced by the Councils and to the nature, scale and complexity of the Councils activities. They are also clear, practical, accessible, effectively implemented and enforced.

Top level commitment

The top-level management should be committed to preventing bribery by persons associated with it. They foster a culture within the Councils in which bribery is never acceptable.

Risk Assessment

The nature and extent of the Councils exposure to potential external and internal risks of bribery on its behalf by persons associated with it is periodically assessed. This includes financial risks but also other risks such as reputational damage.

Due diligence

The Councils take a proportionate and risk based approach, in respect of persons who perform or will perform services for or on behalf of the Councils, in order to mitigate identified bribery risks.

Communication (including training)

The Councils seek to ensure that their bribery prevention policies and procedures are embedded and understood throughout the Councils through internal and external communication, including training that is proportionate to the risks they face.

Monitoring and review

Procedures designed to prevent bribery are monitored and reviewed and improvements are made where necessary.

6. Penalties

An individual guilty of an offence under sections 1, 2 or 6 is liable:

- On conviction in a magistrates court, to imprisonment for a maximum term of 12 months (six months in Northern Ireland), or to a fine not exceeding £5,000, or to both.
- On conviction in a crown court, to imprisonment for a maximum term of ten years, or to an unlimited fine, or both.

The Councils, if convicted under sections 1, 2 or 6 will also face the same level of fines and, if guilty of an offence under section 7, is liable to an unlimited fine.

7. Bribery is not tolerated

It is unacceptable to:

- Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
- Give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return
- Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy
- Engage in activity in breach of this policy.

8. Facilitation payments

Facilitation payments are not tolerated and are illegal. Facilitation payments are unofficial payments made to public officials in order to secure or expedite actions.

9. Gifts and hospitality

This policy is not meant to change the requirements of the Councils gifts and hospitality policy.

10. Responsibilities

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Councils or under its control, they should actively avoid breaches of this policy.

You must:

- Ensure that you read, understand and comply with this policy
- Raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. As well as the possibility of civil and criminal prosecution, staff that breach this policy will face disciplinary action, which could result in dismissal for gross misconduct.

11. Raising a concern

This Councils are committed to ensuring that all employees, organisation or persons associated with the Councils business have a safe, reliable, and confidential way of reporting any suspicious activity.

We all have a responsibility to help detect, prevent and report instances of bribery. If you have a concern regarding a suspected instance of bribery or corruption, please speak up – your information and assistance will help. The sooner you act, the sooner it can be resolved.

Concerns can be anonymous. In the event that an incident of bribery, corruption, or wrongdoing is reported, we will act as soon as possible to evaluate the situation. We have clearly defined procedures for investigating fraud, misconduct and non-compliance issues and these will be followed in any investigation of this kind.

You should normally report any concerns to your immediate manager for the matter to be dealt with. Line Managers must not investigate any suspected case of Bribery but must refer it immediately to the Director of Finance, or the relevant Chief Executive (Three Rivers and Watford) who will decide what further action is to be taken. If you feel unable to do this, e.g. you feel that your manager may be implicated or you have already done so but do not feel that the matter has been properly dealt with; you can then use the whistleblowing process to report any concern.

You are encouraged to put your name to any issue raised. Anonymous concerns are much less powerful and are often difficult to follow up, especially if further information is required.

Staff who refuse to accept or offer a bribe, or those who raise concerns or report wrongdoing can understandably be worried about the repercussions. The Councils aim to encourage openness and

will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken.

The Councils are committed to ensuring nobody suffers detrimental treatment through refusing to take part in bribery or corruption, or because of reporting a concern in good faith.