

By: Neeta Major – Head of Internal Audit
To: Governance and Audit Committee – 24 July 2014
Subject: **REVIEW OF ANTI-FRAUD AND CORRUPTION STRATEGY**
Classification: Unrestricted

Summary: This paper provides a summary of proposed amendments to the Council's Anti-Fraud and Corruption Strategy.

FOR APPROVAL

Introduction and Background

1. We have completed our annual review of the Council's Anti-Fraud and Corruption Strategy and a number of amendments are recommended which can be summarised as follows:
 - Removal of the paragraphs related to recruitment checks (paragraphs 17 & 18) as this guidance is included in the Blue Book (Kent Scheme).
 - Inclusion of information about how we will share information to prevent and detect fraud (paragraph 22).
 - Moving the section on whistleblowing to section E Raising a Concern (paragraphs 33 - 38) as this is a more logical place for these paragraphs.
 - Updating the evidential and public interest factors to be taken into account when deciding whether to instigate criminal proceedings in accordance with the latest Code for Crown Prosecutors (annex 1 of the strategy, paragraphs 23-25).
 - Revision of the simple and conditional cautions section so that KCC can offer simple cautions where a more lenient approach to prosecution is considered appropriate (annex 1 of the strategy, paragraphs 29-30). This is in line with the approach adopted by Trading Standards.
 - Revision of the section on corruption as the various corruption acts have been repealed by the Bribery Act 2010 (annex 2 of the strategy).
2. In these circumstances it is appropriate for the strategy to be presented to the Committee for review and agreement. A copy Anti-Fraud and Corruption Strategy (with tracked revisions) is attached at Appendix A for the Committee to approve.

Recommendations

3. Members are asked to approve the revised Anti-Fraud and Corruption Strategy (**Appendix A**).

Paul Rock
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