ESSINGTON PARISH COUNCIL

ANTI-FRAUD AND CORRUPTION POLICY

1. Statement of Intent

Essington Parish Council ("the Council") is committed to maintaining the highest standards of integrity, honesty, openness, and accountability in all its activities. The Council adopts a **zero-tolerance approach** to fraud, corruption, theft, bribery, and dishonest conduct in all its dealings.

The Council expects all councillors, officers, employees, contractors, and volunteers to act lawfully and in accordance with:

- the **Localism Act 2011**
- the Council's **adopted NALC Model Code of Conduct**
- the Council's **Standing Orders**
- the Council's **Financial Regulations**
- all relevant legislation, guidance, and best practice for local councils.

This policy supports good governance, safeguarding of public funds, and public confidence in the Council.

2. Scope

This policy applies to:

- all elected and co-opted councillors
- all employees and the Clerk
- contractors, consultants, volunteers, and third parties acting on behalf of the Council

Everyone covered by this policy shares responsibility for preventing, detecting, and reporting fraud and corruption.

3. Definitions

Fraud

Fraud is any deliberate act of deception, falsification, concealment, or misuse of information or assets intended to result in personal gain or financial loss to the Council. This includes, but is not limited to:

- false claims or invoices
- misappropriation of funds or assets
- payroll fraud
- false accounting
- cyber or online payment fraud.

Corruption

Corruption includes the offering, giving, soliciting, or accepting of any inducement, reward, or advantage that may influence the actions of an individual and compromise impartial decision-making.

This includes:

- bribery
- failure to declare an interest
- abuse of position
- improper use of information.

4. Principles and Culture

The Council is guided by the **Nolan Principles of Public Life**:

- Selflessness
- Integrity
- Objectivity
- Accountability
- Openness
- Honesty
- Leadership

The Council promotes a culture where fraud and corruption are **not tolerated**, and where concerns are raised **without fear of victimisation or retaliation** when done in good faith.

5. Responsibilities

5.1 Role of Councillors

All councillors have a duty to:

- safeguard public money and Council assets
- comply with the Code of Conduct
- declare and register interests properly
- avoid conflicts of interest
- act transparently and lawfully
- report any suspected fraud or corruption promptly.

Councillors must not seek to influence officers improperly or place themselves in situations that compromise impartiality.

5.2 Role of the Clerk and Officers

The Clerk is responsible for:

- implementing and maintaining this policy
- ensuring appropriate financial controls are in place
- ensuring staff awareness of procedures
- reporting suspected fraud and corruption
- coordinating investigations.

Officers and employees are expected to:

- follow Financial Regulations and Standing Orders
- safeguard Council assets
- report concerns promptly
- cooperate fully with investigations.

5.3 Recruitment and Preventative Controls

The Council recognises that prevention begins with:

- robust recruitment procedures
- verification of identity, references, and qualifications
- appropriate DBS checks where required
- segregation of duties within financial processes
- regular financial monitoring and reconciliation.

6. Conflicts of Interest

All councillors and employees must declare any interests that could:

- influence decision-making
- give rise to personal benefit
- create a perception of impropriety.

Failure to declare interests may be treated as misconduct and, where relevant, corruption.

7. Whistleblowing and Reporting Concerns

The Council encourages the reporting of concerns at the earliest opportunity.

Suspected fraud or corruption should be reported:

- directly to the **Clerk**, or
- via the Council's **Whistleblowing Policy**.

Reports will be treated confidentially where possible and investigated appropriately. Retaliation against individuals who raise concerns in good faith will not be tolerated.

8. Detection, Investigation, and Response

The Council maintains systems of internal control to deter and detect fraud, including:

- Financial Regulations
- internal audit
- regular monitoring of accounts
- separation of duties.

Investigations will normally be conducted by the Clerk and reported to the Chairman. Where appropriate, matters may be referred to:

- the Police
- the external auditor
- the Monitoring Officer.

Any loss suffered will be reported to the external auditor and the Council will seek to recover losses where possible.

9. Disciplinary and Legal Action

Fraud and corruption are serious matters. Where allegations are substantiated:

- employees may face disciplinary action
- councillors may face action under the Code of Conduct
- criminal proceedings may be pursued where appropriate.

The Council will act consistently, proportionately, and lawfully.

10. Awareness and Training

The Council will ensure:

- councillors and staff are aware of this policy
- appropriate training is provided
- financial controls are understood
- updates are communicated when procedures or risks change.

11. Review and Approval

This policy will be:

- reviewed **annually**
- approved by **Full Council**

- updated in line with legislative changes, audit recommendations, and best practice.

12. Adoption

Adopted March 2021

Reviewed and Updated by Full Council: 23rd March 2026

Next Review Due: March 2027