ANTI-FRAUD, BRIBERY, AND CORRUPTION POLICY

(March 2026)

Bolsover District Council

We speak your language

Polish

Mówimy Twoim językiem

Slovak

Rozprávame Vaším jazykom

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我们会说你的语言

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CONTROL SHEET FOR ANTI-FRAUD, BRIBERY + CORRUPTION POLICY

Policy Details	Comments / Confirmation (To be updated as the document progresses)
Policy title	Anti-Fraud, Bribery and Corruption Policy
Current status – i.e. first draft, version 2, or final version	Approved version
Policy author (post title only)	Director of Finance & Section 151 Officer
Location of policy (whilst in development)	S/Drive
Relevant Cabinet Member (if applicable)	Portfolio Holder for Resources
Equality Impact Assessment approval date	n/a
Partnership involvement (if applicable)	n/a
Final policy approval route i.e. Executive/ Council	Executive
Date policy approved	
Date policy due for review (maximum three years)	2029
Date policy forwarded to Performance & Communications (to include on Extranet and Internet if applicable to the public)	

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1. Introduction

1.1 Bolsover District Council has a responsibility for the provision of effective and efficient services and to ensure the protection of the public purse. The Council recognises that failure to implement effective anti-fraud measures can undermine the standards of our public services.

1.2 The Council does not, and will not, engage indirectly in or otherwise encourage bribery, nor does it wish to be associated with any organisations that does or has done so. This extends to all third parties whether such conduct is associated with business on behalf of the Council or not.

2. Scope of the Policy

2.1 This policy aims to help employees (including temporary and agency workers), Elected Members and Co-opted Members on the Council's committees, to understand their roles in the Council regarding fraud, bribery, and corruption. Employees must ensure they adhere to legal and contractual requirements and ensure that all procedures and practices remain above reproach.

2.2 This policy also aims to help partners, contractors, suppliers, voluntary organisations, and members of the public to understand how and when to contact the Council with their concerns.

2.3 In adopting this Policy the Council is setting the standard at a sufficiently high level and is sending a clear message that:

- Fraud, bribery, or corruption will not be tolerated.
- All reported or identified instances will be dealt with in a professional and timely manner.
- It is committed to preventing and detecting fraud, bribery, or corruption.
- Those perpetrating fraud, bribery or corruption will be dealt with swiftly and firmly and be prosecuted using all the sanctions available.

2.4 The Council acknowledges that the vast majority of local government employees and those that work with them act with honesty and integrity at all times to safeguard the public resources they are responsible for. However, there are a few people who may not act in this way.

2.5 Consequently, any allegations involving this Council (received in any way, including those made anonymously), will be taken seriously and be investigated in an appropriate manner. There is a need to ensure that allegations are not frivolous or vexatious, as in the case of reporting employees this could result in disciplinary action.

2.6 When fraud, bribery or corruption has occurred because of a breakdown in the Council's systems or procedures, senior management will ensure that appropriate improvements in controls are implemented to avoid recurrence.

2.7 To assist all employees and Members in their awareness of this approach to fraud, management will ensure:

- Participation in training and awareness programmes covering fraud detection and prevention.

- Ensure employees understand internal controls are designed and intended to prevent and detect fraud.

- Encourage employees to report suspected fraud directly to those responsible for investigations without fear of disclosure or retribution – as set out in the Council's Whistleblowing Policy.

3. Failure to Prevent Fraud

3.1 The Council will not commit the offence of failing to prevent fraud which was a new offence created by the Economic Crime and Corporate Transparency Act 2023, provided that we can show we have adequate procedures in place to prevent it. We have put in place a fraud prevention framework which is informed by the following six principles:

- **Top Level Commitment** – Continued support from the Senior Leadership Team fosters a culture of integrity where fraud is unacceptable. With support from Members and the Senior Leadership Team we can promote a zero-tolerance culture and ensure that we make sure that our staff understand that bribery and fraud are not tolerated and to take the necessary action to address any risks.

- **Risk Assessment** – Risk management is all about managing the Council's threats and opportunities. By managing the Council's threats effectively, we will be in a stronger position to deliver the Council's objectives. It is acknowledged that risk is a feature of all business activity and is an attribute of the more creative of its strategic developments. The Council accepts the need to take proportionate risk to achieve its strategic objectives but expects that these are properly identified and managed. By managing these opportunities in a structured process, the Council will be in a better position to provide improved services and better value for money.

- **Proportionate Risk-based Prevention Procedures** – Adequate fraud prevention procedures are proportionate to the risks that the Council faces. The procedures and policies of the Council are put in place to prevent fraud and are designed to mitigate identified risks as well as to prevent deliberate unethical conduct on the part of associated persons.

- **Due Diligence** – We need to know exactly who we deal with in the Council and to protect our organisation from taking on people who are less trustworthy. The Council conducts due diligence checks on all third parties that they form a partnership with. It is encouraged that if there are material changes to the business relationship, due diligence is re-evaluated to ascertain if the relationship and its risk level have changed.

- **Communication (including training)** – The Council seeks to ensure that its fraud prevention policies and procedures are embedded and understood throughout the organisation through internal training, that is proportionate to the risks it faces. The Council will ensure that all levels of employees are aware of this policy via internal processes. We ensure that fraud and bribery awareness training is conducted with new staff, existing staff, and Members.

- **Monitoring and review** – We face the risk of the effectiveness of our procedures, and these may change over time. We will measure the level of fraud and corruption across the Council and introduce and maintain measures ensuring that policies and procedures are kept up to date with any changes, by utilising the full range of integrated actions available to prevent, detect, sanction, and seek redress for fraud, bribery, and corruption. We ensure that policies and procedures designed to prevent and deter fraud, bribery, and corruption are adopted and consistently implemented across the Council.

4. Definitions

4.1 Fraud and Corruption

According to the Fraud Act 2006, fraud can be committed in the following three ways:

- Fraud by False Representation - A person commits an offence when they dishonestly make a false representation, and intend, by making the representation to make a gain for themselves or another, or cause loss to another person or expose another to a risk of loss. A representation is false if it is untrue or misleading and the person making it knows that it is, or might be, untrue or misleading.

- Fraud by Failing to Disclose Information - An offence is committed where a person dishonestly fails to disclose to another person, information which they are under a legal duty to disclose and intends, by failing to disclose the information to make a gain for themselves or another, or cause loss to another or expose another person to a risk of loss.

- Fraud by Abuse of Position - An offence is committed where a person occupies a position in which they are expected to safeguard, or not to act against, the financial interests of another person, dishonesty abuses that position, and intends, by means of the abuse of that position to make a gain for themselves or another, or cause loss to another person or expose another to a risk of loss.

4.2 The term fraud is generally used to describe such acts as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusions. This list is not intended to be exhaustive, merely an exemplification of possible frauds.

4.3 This policy therefore covers all financial impropriety including theft or corruption, which is described in more detail below:

- According to the 1968 Theft Act, "a person shall be guilty of theft if they dishonestly appropriate property belonging to another with the intention of permanently depriving the other of it."

- Corruption is the offering, giving, soliciting or acceptance of an inducement or reward that may influence the actions taken by the audited body, its Members, or employees.

4.4 Actions constituting fraud or corruption may include, but are not limited to:

- Any dishonest or fraudulent act against the Council.

- Forgery or alteration of any record or account belonging to the Council.

- Forgery or alteration of a cheque or any other financial document.

- Misappropriation of funds, securities, supplies, or other assets.

- Impropriety in the handling or reporting of money or financial transactions.

- Profiteering as a result of insider knowledge of Council activities.

- Disclosing confidential and proprietary information to outside parties.

- Destruction, removal or inappropriate use of records, furniture, fixtures, and equipment.

- Failure to declare an interest.

4.5 **Bribery**

The Bribery Act 2010 was introduced to update and enhance UK law on bribery including foreign bribery. Notably, it introduced a new strict liability offence for companies and partnerships of failing to prevent bribery. The introduction of this new corporate criminal offence places a burden of proof on local authorities to show they have adequate procedures in place to prevent bribery.

4.6 The Council could be guilty of an offence if an 'associated person' carries out an act of bribery in connection with its business. A person will be 'associated' where that person performs services for or on behalf of the Council and could include contractors and sub-contractors. The Bribery Act also provides for strict penalties for active and passive bribery by individuals as well as companies.

4.7 Bribery can be described as the receiving of an inducement for an action which is illegal, unethical or in breach of trust. Inducements can take the form of gifts, fees, rewards, or other advantages such as retaining business.

4.8 The Bribery Act created four prime offences:

- Two general offences covering the offering, promising, or giving of a bribe, and the requesting, agreeing to receive or accepting a bribe.

- A discrete offence of bribery of a foreign public official.

- A new offence of a commercial organisation failing to prevent a bribe being paid.

4.9 A statutory defence to the strict liability offence of 'failing to prevent bribery' is the introduction of internal adequate procedures. The Council provides for such arrangements through this policy and associated documents, the appointment of the Council's Monitoring Officer to deal with all matters relating to bribery and corruption, management's commitment to a zero-tolerance culture and training of relevant employees.

4.10 **Tax Evasion**

4.11 The Criminal Finance Act 2017 introduced two new criminal offences; one relating to UK tax evasion and one relating to foreign tax evasion. The new offences are designed to help the Government counter circumstances where a body's employees facilitate tax evasion by their customers or suppliers. Although tax evasion does not have a direct impact on the Council, under the new legislation there is a strict liability for failing to prevent the facilitation of tax evasion by one of its associates, such as an employee or contractor. This could arise, for example, if a Council employee conspired with a supplier to falsify the amount paid on an invoice so that the supplier evaded paying income or corporate taxes.

4.12 There are three tests that must be passed before an offence is committed:

- Criminal tax evasion by a taxpayer (either an individual or a legal entity).

- Criminal facilitation of the offence by a person associated with the body, by taking steps with a view to being knowingly concerned in; or aiding, abetting, counselling, or procuring the tax evasion by the taxpayer and

- The body not preventing a person associated with it from committing the criminal facilitation.

4.13 Similar to the Bribery Act 2010, there is a statutory defence of having 'reasonable prevention procedures' in place. HMRC has issued guidance on this setting out six risk principles that all organisations are expected to consider when reviewing whether they have proportionate and reasonable risk protocols in place.

5. Corporate Framework

5.1 The Council has a wide range of interrelated policies and procedures that provide an effective deterrent to fraudulent activity and provide the means for reporting or detecting fraud or corruption. These have been formulated in line with appropriate legislative requirements, and it is important that all employees and Members know about them. The Council's 'Plans and Strategies Control Log' ensures the documents are regularly reviewed and updated.

5.2 They include:

- The Council's Constitution
- Financial Regulations and Contract Procurement Rules
- Local Codes of Conduct for Members and Officers
- Local Code of Corporate Governance
- Confidential Reporting Policy – Contractors, Sub-Contractors, and Agency Workers
- Accounting procedures and records
- Sound internal control systems
- Effective internal audit
- Effective recruitment and selection procedures
- Disciplinary Procedure
- Grievance Procedure
- Confidential Reporting Policy - Employees
- The Whistleblowing Policy
- Anti-Money Laundering Policy
- Overt Surveillance Use Policy
- Corporate Enforcement Policy
- Planning Protocol

5.3 Managers must ensure that all employees have access to the relevant rules and regulations and receive suitable training.

5.4 Members and employees must ensure that they read and understand the rules and regulations that apply to them and act in accordance with them.

6. The Policy Statement

6.1 Bolsover District Council wishes to promote a culture of openness and honesty consistent with the principles for conduct identified by the Committee for Standards in Public Life and expects all those who work for and with the Council to adopt the highest standards of propriety and accountability.

6.2 The Council has in place a clear network of systems and procedures to assist it in the prevention and investigation of fraud, bribery, and corruption. The Council is committed to ensuring that these arrangements keep pace with future developments, in both preventative and detection techniques, regarding fraudulent or corrupt activity that may affect its operation or related responsibilities.

7. Identifying the Risk of Fraud, Bribery, or Corruption and Risk Mitigation

7.1 In having a risk management strategy, which includes risk mitigation measures, the Council aims to detect fraud, bribery or corruption and deter potential perpetrators of such activity. This policy sets out exactly what steps to take on suspecting fraud, bribery, or corruption.

7.2 In having a continuous programme of awareness and regular updates and training for new and existing employees, and in referring to this Policy in its quotation/tender documents with suppliers and its procurement guide, the Council aims to mitigate the risk of fraud, bribery or corruption taking place.

8. Responsibilities

8.1 The primary responsibility for the prevention, detection and investigation of fraud, bribery, or corruption rests with senior management, who are also responsible for managing the risk of such occurrences. However, the Council requires all employees and Elected Members to act honestly and with integrity at all times and to guard the resources for which they are responsible. Fraud and corruption can pose a significant threat to these resources and must therefore also be their concern.

8.2 In doing so, and having regard for the Council's codes of conduct, there is a requirement for all employees and Elected Members or persons acting on behalf of the Council to notify the Council immediately of any financial or accounting irregularity, or suspected irregularity, or of any circumstances which may suggest the possibility of such loss or irregularity, including those affecting cash, stores, property, remuneration or allowances.

8.3 The purpose of this Policy document is to also set out specific responsibilities with regards to the prevention and detection of fraud, bribery and corruption as follows:

8.4 **Monitoring Officer** (Director of Governance & Legal Services) is responsible for:

- Preparing a report to Council where it appears that the authority has or is about to do anything which would be in contravention of the law or which would constitute maladministration.
- Promoting good governance in the Council.
- The maintenance and operation of the Council's Whistleblowing Policy.

8.5 **Chief Financial Officer** (Director of Finance & Section 151 Officer) is responsible for:

- Ensuring proper arrangements are made for the Council's financial affairs.
- Ensuring the Council implements appropriate measures to prevent and detect fraud, bribery, and corruption, and protect the Council's assets from fraud and loss.
- Ensuring that the Council has put in place effective arrangements for internal audit and that it is adequately resourced and maintained.
- Supporting the Council's internal audit arrangements and ensuring that the Audit Committee receives the necessary advice and information, to ensure it operates effectively.
- Ensuring that this Policy is current.

- The maintenance and operation of this Policy.

- The maintenance and operation of the Council's Anti-Money Laundering Policy.

8.6 The **Monitoring Officer** and/or the **Chief Financial Officer** shall be responsible for initiating action if fraud, bribery, or corruption may have been identified.

8.7 **Directors, Assistant Directors** and **Service Managers** are responsible for:

- Ensuring that adequate systems of internal control exist within their areas of responsibility, and that such controls, checks and supervision operate in such a way as to prevent or detect fraudulent activity.

- Ensuring that duties are organised in such a way that no one person can carry out a complete transaction without some form of checking or intervention being built into the process (separation of duties). This is considered a fundamental control in systems, particularly within financial procedures and when involving significant transactions.

- Regularly assessing the types of risks and scope for potential fraud associated with the operations in their area.

- Ensuring all employees receive fraud awareness training. The level and extent of this will depend on the work that individual employees carry out.

- Reminding employees, who are an integral part of the control framework, of fraud and risk issues.

- Implementing audit recommendations promptly.

- Responding to reports of possible financial impropriety in accordance with the Council's Whistleblowing Policy, this Policy, and the Anti-Money Laundering Policy.

8.8 **Employees** are responsible for:

- A duty to act if they believe there is a possibility of fraud, bribery, corruption, or poor value for money taking place or rules are being breached.

- Their own conduct and for contributing towards the safeguarding of corporate standards including abiding by the Council's Local Code of Conduct for Employees (which includes declaration of interests, private working, use of Council resources, registering gifts or hospitality, whistleblowing etc.) and by following any code of conduct relating to their personal professional qualifications.

- Acting with propriety in the use of official resources and in the handling and use of corporate funds whatever they involve.

- Remaining aware of the codes, protocols, policies, and procedures as referred to in this Policy document.

- Be alert to any financial transactions that may suggest money laundering (separate policy and procedures are available for cases of possible money laundering).

8.9 **Elected Members** and **Co-opted Members** of the Council are responsible for:

- Raising and reporting any issues that they have reason to believe may involve fraud, bribery, or corruption of any kind.

- Their own conduct and for contributing towards the safeguarding of corporate standards, as detailed in the Local Code of Conduct for Members and the Protocol on Member/Officer Relations both contained in the Council's Constitution.

- Ensuring they avoid any situation where there is potential for a conflict of interest.

- Familiarising themselves with the codes, protocols, policies, and procedures as referred to in this Policy document.

8.10 **Internal Audit** is responsible for:

- Maintaining a corporate fraud risk register and undertaking a programme of proactive activities to identify potential cases of fraud, bribery, or corruption.

- Investigating or assisting with the investigation of all fraud, bribery and corruption as commissioned by the Chief Financial Officer/Monitoring Officer.

- Reporting to and liaising with the Police and other external agencies on individual cases, subject to 10.8.

- Making appropriate arrangements to co-ordinate the Council's work on National Fraud initiatives.

- Co-ordinating the Council's response to external fraud surveys.

- Issuing advice and guidance to Members, management, and Officers in relation to fraud and corruption related legislation and procedures.

- Promoting fraud awareness and training through the dissemination of fraud bulletins, e-learning tools, marketing, and other initiatives.

8.11 **External Audit** is responsible for:

- Stewardship of public money.

- Considering if the Council has adequate arrangements in place to prevent and detect fraud and corruption.

8.12 **Revenues and Benefits team** is responsible for:

- Investigating allegations of council tax fraud including Council Tax Reduction Scheme, discounts, and exemptions.
- Providing information and evidence to the DWP Single Fraud Investigation Service (SFIS) to support their investigations on allegations of Housing Benefit fraud and social security benefits.

- Investigating potential fraud regarding Business Rates reliefs and exemptions.

8.13 Role of **Committees**

- The Standards Committee has responsibility to promote and maintain high standards of conduct for Elected Members and Co-opted Members.

- The Audit Committee has responsibility for the risk management framework and the associated control environment, corporate governance arrangements and the overview of the Council's anti-fraud, bribery, and corruption arrangements.

9. Prevention of Fraud, Bribery, and Corruption

9.1 Employee Recruitment and Management

A key preventative measure against fraud is to deter employees who might undertake such activities. The Council recognises that effective recruitment processes are essential to ensure the integrity of all new employees. These include:

- The checking of identity documents.

- Reference and qualification checks for new employees.

- Checks for appropriate posts through the Disclosure and Barring Service.

- Detailed appraisal of employees' performance and ability during probationary periods and throughout their entire employment.

9.2 Contractors and Suppliers

The Council will ensure that all contracts conform to the highest standards possible and ensure that those organisations that work with the Council to deliver services are made aware of the Council's strong anti-fraud, bribery, and corruption principles, including the Whistleblowing policy.

9.3 Where appropriate the Council may exclude suppliers, contractors and service providers from public contracts following conviction for certain offences including participation in criminal organisations, fraud, corruption, bribery, or money laundering.

9.4 The Council will seek an assurance that those tendering to provide supplies, goods, services and works to the Council have adequate anti-fraud, bribery or corruption recruitment procedures and controls in place; have not colluded with others during the tendering process; or canvassed or solicited any Elected Member or employee of the Council in connection with the award or future award of contracts.

9.5 In awarding any contract, the Council will act in accordance with its Contracts and Procurement Regulations. Within its contract terms, the Council may exercise its right to terminate a contract and recover its losses if there is evidence of fraud, bribery, or corruption in connection with a Council contract by the contractor, its employees or anyone acting on the contractor's behalf.

9.6 The Council may seek the strongest available sanctions against the contractor, their employees or anyone acting on behalf of the contractor who commits fraud, bribery or corruption against the Council and will request that the organisation concerned takes appropriate action against any individual concerned.

9.7 Where contractors are involved with the administration of Council finances or those for which the Council has responsibility, the Council will conduct internal audit reviews and pro-active anti-fraud, bribery, or corruption exercises as part of the contract management process.

9.8 **Collaboration and Working with Others**

The Council is committed to working and co-operating with other organisations such as the police, to prevent organised fraud, bribery, and corruption. Wherever possible and legal, the Council will assist and exchange information with other appropriate bodies to assist in investigations to combat fraud, bribery, and corruption.

9.9 The Council is committed to participation in the National Fraud Initiative. The Council provides information from relevant databases for matching against similar information of other Local Authorities and participating organisations.

10. Detection and Investigation

The range of preventative systems within the Council, particularly internal control systems, can provide indicators of fraud, bribery or corruption (and error) and can help to detect any inappropriate activity.

10.1 Management have responsibility for preventing and detecting fraud, bribery or corruption, and proactive exercises will be conducted by Internal Audit in targeted service areas where there is considered to be a high risk from fraud. However, despite the best efforts of managers and auditors, many irregularities are discovered often by chance or through the alertness of others and will come to the attention of the Council through its whistleblowing arrangements.

10.2 **Whistleblowing**

Employees – The Council operates a Confidential Reporting Policy (Whistleblowing Policy) in accordance with the provisions of the Public interest Disclosure Act 1998, which is intended to encourage and enable all employees of the Council, including trainees and agency workers, to raise concerns about any financial or other malpractice in the Council. Everything will be done to protect confidentiality. They will be advised of the action that has been taken as far as the law will allow. The Whistleblowing Policy is on the Council's extranet.

10.3 Where Members of the Council and Co-opted Members of Committees come into possession of information which may indicate a fraudulent or corrupt act is being perpetrated against the Council, they should report this to either the Head of Paid Service, one of the Directors, the Monitoring Officer, the Chief Financial Officer, the Internal Audit Consortium Manager or the Chairman of the Audit Committee, in accordance with the Protocol on Officer/Member Relations (part 5.4 of the Constitution) which complements the Local Code of Conduct for Members.

10.4 Customers, suppliers, contractors, and members of the public can raise their concerns either via:

- Contacting the Council's Internal Audit Service (01246 242424) or via post at the Council's Offices.
- By email at enquiries@bolsover.gov.uk
- The Protect helpline (formally Public Concern at Work) (020 3117 2550 and 020 7404 6609) email Whistle@protect-advice.org.uk

10.5 Council Tax Reduction Scheme fraud can be reported via the following channels:

- By email to Benefits@bolsover.gov.uk
- Directly contacting the Revenues and Benefits team (01246 242436)

10.6 **Investigation**

Investigations will be carried out in response to referrals of potential fraud. When information relating to fraud or corruption is obtained it is reviewed and subject to an informal risk assessment. Some are followed up with a full investigation, and others may be better dealt with as management issues. Where appropriate management shall:

- Report all allegations immediately to Internal Audit and senior management.
- Follow any guidance provided.
- Where appropriate, contact other agencies, e.g. the Police.
- Where appropriate, support the Council's investigation and disciplinary procedures.

10.7 Depending on the nature and anticipated extent of the information obtained, Internal Audit will normally work closely with:

- Senior leadership

- Human Resources
- Legal Services
- Other agencies, such as the Police and the Office of Fair Trading.

10.8 This is to ensure that all allegations and evidence are thoroughly investigated and reported upon, and that where appropriate, losses are recovered for the Council. Where financial impropriety is discovered the matter may be referred to the Police. Referral to the Police will not prohibit subsequent or concurrent action under the disciplinary procedures.

10.9 Reporting cases in accordance with the Policy and the Whistleblowing policy is essential and ensures the consistent treatment of information regarding fraud, bribery, or corruption; facilitates the proper investigation of suspected cases and protects the interests of individuals and the Council.

10.10 The Council will treat all information received confidentially and will not disclose or discuss investigations with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of people suspected but subsequently found innocent of wrongful conduct and to protect the Council from potential civil liability. Any processing of personal data will comply with the Data Protection Act and the data protection principles.

11. Deterrence

11.1 The Council recognises that fraud, bribery, and corruption are costly, both in terms of reputation risk and financial losses. The prevention of fraud is therefore a key objective of the authority and respective measures are outlined below.

11.2 There are a number of ways in which we deter potential fraudsters from committing or attempting fraudulent or corrupt acts, whether they are inside or outside of the Council, and these include:

- Publicising the fact that the Council is firmly set against fraud, and corruption at every appropriate opportunity.
- Acting robustly and decisively when fraud, bribery and corruption is suspected.
- Prosecution of offenders.
- Taking action to effect maximum recovery for the Council.
- Use of the Proceeds of Crime Act where appropriate to maximise the penalty and the level of recovery by the Council.
- Having sound internal control systems, that still allow for innovation and efficiency, but at the same time minimising the opportunity for fraud, bribery, and corruption.

- Reporting to the media any action taken relating to acts of impropriety, subject to the usual restrictions on reporting legal proceedings.

11.3 **Training and Awareness**

It is the responsibility of management to communicate the Anti-Fraud, Bribery, and Corruption Policy to their employees and to promote within their teams a greater awareness of and alertness to the signs of fraud and corruption.

11.4 Through induction training the Council ensures that all employees are clear about their responsibilities and duties in this respect, particularly those officers involved in internal control systems. Senior management should ensure Members are aware of this Policy initially via the induction process and then reminding them of this Policy via Council publications.

11.5 **Courses of Action**

Mechanisms exist within the Council to act in cases of fraud, bribery, or corruption. These include the following:

11.6 Disciplinary Action
Gross misconduct and other fraudulent or corrupt conduct will normally lead to dismissal. Failure to comply or breach any sections contained within this Policy could also be regarded by the Council as gross misconduct. Such actions will be dealt with in accordance with the Council's disciplinary procedures.

11.7 Prosecution
The Council will seek full redress through the legal processes available to counter any internal or external fraudulent activities perpetrated against it. This redress will be achieved through criminal and/or civil courts as considered appropriate.

11.8 The Head of Paid Service, in consultation with the Monitoring Officer, the Chief Financial Officer, the Human Resources Manager, the Internal Audit Consortium Manager and other external agencies as appropriate, will decide whether to formally refer the case to the Police for prosecution. Other external agencies involved may include Government Departments and the Crown Prosecution Service.

11.9 The Council will take all reasonable steps to recover any money or goods.