

**BUCKINGHAMSHIRE COUNTY COUNCIL  
ANTI – FRAUD AND CORRUPTION: RESPONSIBILITIES**

	<b>ACTION</b>	<b>RESPONSIBILITY</b>
	<b>MEASUREMENT OF FRAUD AND CORRUPTION LOSSES</b>	
<b>1</b>	Ensure that as part of the risk management process the Council attempts to identify accurately the nature and scale of losses to fraud and corruption and also takes into account fraud and corruption risks in relation to significant partnerships	Heads of Service
	<b>AUTHORITY AND SUPPORT</b>	
<b>2</b>	Ensure that there is strong political and executive support for work to counter fraud and corruption.	Member Champion (Chairman of Regulatory & Audit Committee) and Chief Executive
<b>3</b>	Ensure that there is a level of financial investment in counter fraud and corruption work that is proportionate to the risk that has been identified.	s151 Officer (Head of Finance)
	<b>TRAINING</b>	
<b>4</b>	Ensure that those working to counter fraud and corruption are professionally trained and accredited for their role and attend regular refresher courses to ensure they are up to date with new developments and legislation.	Assistant Head of Finance
<b>5</b>	Ensure that those working to counter fraud and corruption are undertaking this work in accordance with a clear ethical framework and standards of personal conduct.	Assistant Head of Finance
	<b>PROPRIETY CHECKS</b>	
<b>6</b>	Ensure that there is an effective propriety checking system (i.e. safe recruitment) implemented by appropriately trained staff in place. This should include appropriate action where individuals fail the check.	Corporate Director of People & Policy

	<b>DEVELOPMENT OF EFFECTIVE RELATIONSHIPS WITH OTHER ORGANISATIONS</b>	
<b>7</b>	Ensure that there are framework agreements in place to facilitate working with other organisations and agencies. Ensure that there are regular meetings to implement and update these agreements.	Heads of Service
	<b>FULL RANGE OF ACTION TOGETHER WITH INTEGRATION</b>	
<b>8</b>	Ensure that the organisation is undertaking the full range of action required to ensure that the outcomes in the Anti-Fraud and Corruption Strategy are achieved (i.e. strategy implementation and responsibilities are fulfilled).	Strategic Directors & Heads of Service
	<b>CULTURE</b>	
<b>9</b>	Produce a programme of work which is risk-based and aims to create an anti-fraud and corruption and zero tolerance culture including robust arrangements to facilitate whistle blowing. The following will also have to be implemented: <ul style="list-style-type: none"> <li>• Updating of the Risk Management Strategy</li> <li>• Appointment of an Anti-Fraud Champion</li> </ul>	Assistant Head of Finance
<b>10</b>	Ensure that the programme of work to review the corporate framework which is designed to promote an anti-fraud and corruption culture is being effectively implemented.	Head of Finance, Assistant Head of Finance, Monitoring Officer
<b>11</b>	Ensure that arrangements are in place to monitor and evaluate that a real anti-fraud and corruption culture exists or is developing within the organisation.	Assistant Head of Finance

12	<p>Ensure agreements are in place with stakeholder representatives:</p> <ul style="list-style-type: none"> <li>• to work together to counter fraud and corruption; and</li> <li>• stakeholder representatives benefit from successful counter fraud and corruption work.</li> </ul>	Assistant Head of Finance
	<b>DETERRENCE</b>	
13	Produce a programme of work designed to provide a strong deterrent to fraud and corruption.	Assistant Head of Finance
14	<ul style="list-style-type: none"> <li>• Ensure that a programme of work is also undertaken that is designed to publicise expected standards of ethical conduct;</li> <li>• Ensure that the programme includes ethics training, guidance and information;</li> <li>• Ensure that the progress in raising standards will be communicated to stakeholders.</li> </ul>	Monitoring Officer
	<b>PREVENTION</b>	
15	Ensure that the Council considers fraud and corruption risks within all new policies and systems and to revise existing ones to remove possible weaknesses.	<p>Strategic Directors &amp; Heads of Service</p> <p>Corporate Director – People and Policy</p>
16	Ensure that reports on investigations include a section on identified policy and system weaknesses that allowed the fraud/corruption to take place where appropriate.	Assistant Head of Finance
	<b>DETECTION</b>	
17	Ensure that effective Whistle Blowing arrangements have been established.	Corporate Director of People & Policy and Monitoring Officer

18	<ul style="list-style-type: none"> <li>• Ensure that a programme of analytical intelligence techniques has been established in order to identify potential fraud and corruption.</li> <li>• Ensure also that there are effective arrangements for collating, sharing and analysing intelligence.</li> </ul>	Assistant Head of Finance
19	Ensure that arrangements have been established to ensure that suspected cases of fraud and corruption are reported promptly to the appropriate person for further investigation.	See Fraud Response Plan
20	Ensure that arrangements have been established to ensure that identified potential cases are promptly and appropriately investigated.	See Fraud Response Plan
21	Ensure that proactive exercises are undertaken in key areas of fraud risk or known systems weaknesses.	Assistant Head of Finance (by means of Annual Audit Plan)
	<b>INVESTIGATION</b>	
22	Ensure that there are arrangements in place to review investigation work in order to evaluate outputs in comparison with inputs in terms of effectiveness.	Assistant Head of Finance
23	<p>Ensure that investigation work is carried out</p> <ul style="list-style-type: none"> <li>• in accordance with clear guidance</li> <li>• by investigators with the necessary powers, both in law where necessary and within the organisation</li> </ul> <p>referrals are handled and investigations undertaken in a timely manner.</p>	See Fraud Response Plan
	<b>SANCTIONS</b>	
24	<p>Ensure that all possible sanctions are considered:</p> <ul style="list-style-type: none"> <li>• disciplinary and/or regulatory</li> <li>• civil and criminal.</li> </ul>	See Fraud Response Plan

25	Ensure that consideration of appropriate sanctions takes place at the end of the investigation when all the evidence is available and monitors the extent to which the application of sanctions is successful.	See Fraud Response Plan
	<b>REDRESS</b>	
26	<p>Ensure that the organisation:</p> <ul style="list-style-type: none"> <li>• is effective in recovering any losses incurred to fraud and corruption</li> <li>• uses the criminal and civil law to the full in recovering losses</li> <li>• monitors proceedings for the recovery of losses.</li> </ul>	See Fraud Response Plan
27	Ensure that the procedures for redress include provision for the analysis and recording of the Council's successful recovery rate.	See Fraud Response Plan
	<b>FOCUS ON OUTCOMES</b>	
28	Ensure that a track record of achievement against the outcomes specified in the Anti-Fraud and Corruption Strategy can be demonstrated i.e. the achievement of a real reduction of losses to the authority.	Chief Officers, Strategic Directors and Heads of Service