

Report to	Audit Committee
Date	5 April 2011
By	Director of Corporate Services
Title of Report	Anti-fraud and Corruption Policy
Purpose of Report	To present the draft South Downs National Park Authority (SDNPA) Anti-fraud and Corruption Policy

Recommendation: The Committee is recommended to approve the draft SDNPA Anti-fraud and Corruption Policy.

1. Introduction

- 1.1 In carrying out its duties and responsibilities, the SDNPA is determined to do everything it reasonably can to protect itself and the public from fraud and corruption. The draft Anti-fraud and Corruption Policy is intended to provide a framework to prevent, detect and investigate fraud and corruption. In addition it sets out the responsibilities of various managers and the Audit Committee for implementing this policy.

2. Background

- 2.1 At its meeting on 18 January 2011 the Audit Committee received a Internal Audit report on the SDNPA's developing governance arrangements. This included the following observation from the Head of Internal Audit:

"Although the Authority is a relatively small public body it will be at risk of fraud from both within and outside of the organisation. Information suggests this risk is on the increase but we note that the Authority has not adopted an Anti-Fraud and Corruption Policy. As well as being of use in reacting to frauds committed the communication of such a policy may help to deter individuals who are considering targeting the organisation."

- 2.2 There was a recommendation, accepted by the SDNPA's senior managers, that a draft Anti-fraud and Corruption Policy should be developed for this meeting of the Audit Committee by the Chief Finance Officer and the Director of Corporate Services.

- 2.3 The draft Anti-fraud and Corruption Policy is attached at **Appendix 1**.

3. Anti-fraud and Corruption Policy

- 3.1 The Anti Fraud & Corruption Policy provides a framework for:
- encouraging fraud deterrence and prevention;
 - raising awareness of fraud and corruption and promoting their detection;
 - performing investigations and facilitating recovery of losses;
 - invoking disciplinary proceeding and referrals to the Police; and
 - monitoring, publishing and updating the Strategy and its related procedures and performance.
- 3.2 The Policy covers a wide range of malpractice including:
- the criminal acts of theft of "property", which includes all assets and cash;
 - false accounting;
 - obtaining by deception;
 - pecuniary advantage by deception;

- computer abuse and computer crime; and
 - bribery and corruption.
- 3.3 If fraud or corruption has taken place, the SDNPA will, in appropriate cases:
- prosecute the individual(s) or refer the case to the police;
 - take appropriate disciplinary action where it involves an employee and this may lead to dismissal;
 - refer the case to the Standards Board of England where it involves a Councillor;
 - pursue recovery for any financial loss; and
 - where appropriate the results of any action taken, including prosecutions, will be reported in the media
- 3.4 The Policy applies to all Members, employees and contractors carrying out work for the SDNPA.
- 3.5 The Policy involves a range of activities to ensure it is effective. These include: raising awareness, appropriate training, reporting arrangements, related policies and procedures, working with partners and the work of the Internal Audit services. The Audit Committee has a role in keeping the Policy and this range of activities under review.
- 4. Resources**
- 4.1 Any financial implications of implementing this Policy will be met from the existing budgets.
- 4.2 The Policy is intended to protect the SDNPA from fraud and corruption.
- 5. Risk Management**
- 5.1 All organisations are exposed to the risks of fraud and corruption. Whilst these risks cannot be completely overcome, they can be reduced by an effective Anti-fraud and Corruption Policy and operational measures to prevent, detect and investigate matters,
- 6. Human Rights, Equalities, Health and Safety**
- 6.1 There are no implications arising from this report.
- 7. External Consultees**
- 7.1 None.

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Appendices	Appendix 1 – Anti-fraud and Corruption Policy
SDNPA Consultees	Chief Executive Officer, Head of Planning,, Head of Operations, Deputy Chief Finance Officer, Monitoring Officer & Senior Solicitor.