

## **1. INTRODUCTION**

- 1.1 These Financial Regulations are the responsibility of the Treasurer as the officer responsible for the proper administration of the Authority's financial affairs under s73 of the Local Government Act 1985.
- 1.2 References in these Regulations to "the Authority" shall include any Committee, Sub-Committee or officer if the power to act is so delegated and references to him or her will be construed as appropriate.
- 1.3 The Regulations form the major part of the Authority's financial control framework which comprises:
  - Standing Orders - Approved by the Authority;
  - Financial Regulations - Approved by the Authority;
  - Scheme of Delegation to Officers – Approved by the Authority
  - Financial Instructions - Issued by the Treasurer in conjunction with the Fund Director to specify the detailed control arrangements required under specific Regulations;
  - Procedure Manuals - Issued by Senior Management to specify how systems should operate.
- 1.4 The main aims of the Regulations are to:
  - provide sufficient safeguards for the Treasurer to discharge his/her statutory duties;
  - ensure that the financial dealings of the Authority are conducted properly and in accordance with best practice;
  - provide adequate safeguards to officers of the Authority who are individually responsible for ensuring that their actions comply with the Regulations.
- 1.5 The responsibility for monitoring the financial control arrangements rests with the Treasurer's internal audit staff (see Regulation 6.7). In order to ensure consistency in the application of these Regulations, advice on their interpretation should be directed through the Head of Internal Audit.
- 1.6 The Regulations, and in particular those imposing financial limits, will be kept under review by the Treasurer to ensure that they remain consistent with best practice.
- 1.7 Any changes to the Regulations can only be made with the approval of the Authority, unless otherwise specified in the Regulations.

## **2. ROLES AND RESPONSIBILITIES**

### **GENERAL**

- 2.1 In applying these Regulations, the Treasurer and the Fund Director will in certain instances, delegate their individual responsibilities to nominated officers who will undertake the duties on their behalf.
- 2.2 The Treasurer and the Fund Director shall ensure that all staff and third parties where appropriate, comply with the requirements contained in these Regulations.

### **THE AUTHORITY**

- 2.3 The Authority is ultimately responsible for ensuring that the financial management arrangements are adequate and effective and that the internal control system is effective and will, amongst other things:
- appoint a responsible financial officer (the Treasurer);
  - approve the financial control framework, including Financial Regulations;
  - set a budget and agree a levy;
  - monitor actual expenditure against budget;
  - determine an affordable borrowing limit having had regard to the Prudential Code for Capital Finance in Local Authorities;
  - approve the annual report and statement of accounts and publish with it an annual governance statement;
  - maintain an adequate and effective system of internal audit of its accounting records and its system of internal control.
- 2.4 The Authority will delegate to the Treasurer aspects of the financial control arrangements to act on its behalf.

### **THE TREASURER**

- 2.5 The Treasurer is responsible for the proper administration of the Authority's financial affairs in accordance with the provisions of Section 73 of the Local Government Act 1985 and the Accounts and Audit (England) Regulations 2011.
- 2.6 In fulfilling both his/her statutory and professional duties the Treasurer will:
- provide financial advice to the Authority on all aspects of its activity, including the budget, strategic planning and policy making process to ensure efficient, effective and economic use of resources;
  - produce the Statement of Accounts in accordance with the appropriate Codes of Accounting Practice and reporting standards issued from time to time;
  - report to the Authority on the robustness of the estimates for the purposes of the budget calculations and the adequacy of reserves;
  - report to the Authority where reserves are likely to be inadequate, outlining the reasons for the actions taken;
  - ensure that all matters required to be taken into account in respect of the Prudential Code for Capital Finance in Local Authorities are reported to the Authority for consideration;
  - establish procedures to monitor and report performance against all prudential indicators if required;
  - satisfy himself/herself that adequate arrangements are in place for all aspects of tax management;
  - report to the Authority and/or the external auditor if it appears that the Authority's expenditure is likely to exceed the resources available to meet that expenditure;
  - report to the Authority and/or the external auditor any decisions or actions taken (or about to be made or taken) which involve unlawful expenditure;

- ensure that adequate systems and procedures exist to account for all income due and expenditure disbursements made on behalf of the Authority and that controls operate to protect the Authority's assets from loss, waste, fraud or other impropriety;
  - advise on the security of assets, including risk management and insurance;
  - secure the Authority's banking arrangements;
  - provide a treasury management function, including loans and investments, in accordance with the Authority's policy;
  - nominate a properly qualified member of the Authority's staff to deputise should he or she be unable to perform his/her duties.
- 2.7 In addition, in accordance with the delegated arrangements agreed by the Authority under the provisions of the Accounts and Audit (England) Regulations 2011("the Accounts and Audit Regulations"), the Treasurer will maintain an adequate and effective internal audit of the Authority's accounting, financial and other processes, including the approval of the strategic and annual audit plans.

### **THE FUND DIRECTOR**

- 2.8 The Fund Director is responsible for:
- preparation of draft revenue estimates each year for submission to the Treasurer for approval by the Authority;
  - ensuring that the financial administration procedures comply with these Regulations and any Financial Instructions;
  - ensuring that no expenditure is incurred unless it is included in the annual revenue estimates or estimates of capital expenditure approved by the Authority;
  - the accountability and control of staff;
  - the security, custody and management of assets including cash and stores;
  - the issue and maintenance of Procedure Manuals (as instructions to staff) to supplement as necessary, both these Regulations and any Financial Instructions.

### **THE MONITORING OFFICER**

- 2.9 The Monitoring Officer is responsible for reporting any actual or potential breaches of the law or maladministration to the Authority and for ensuring that procedures for recording and reporting key decisions are operating effectively.
- 2.10 The Monitoring Officer in performing his or her duties is authorised to incur expenditure where this is necessary in seeking advice outside the Authority.

### **3. ACCOUNTING ARRANGEMENTS**

- 3.1 The Treasurer is responsible for keeping the principal accounting and costing records of the Authority.
- 3.2 The following principles must be observed in the allocation of accounting duties in order to maintain division of duties:
- the duties of providing information regarding sums due to or from the Authority and of calculating, checking and recording of these sums, must be separated as completely as possible from the duty of collecting or disbursing them;
  - officers charged with the duty of examining and checking the accounts of cash transactions must not themselves be engaged in any of these transactions.
- 3.3 The Treasurer is responsible for producing the Statement of Accounts and shall submit these to the Authority in accordance with the deadlines required by the Accounts and Audit Regulations.
- 3.4 The Treasurer is responsible for ensuring compliance with the Codes of Practice which the Authority may adopt from time to time. The details of such codes will be issued in the form of Financial Instructions to supplement these Regulations.

## **4 FINANCIAL PLANS AND BUDGETS**

### **GENERAL**

- 4.1 The detailed format of and timetable for financial plans, the maintenance and creation of reserves, the capital programme and revenue estimates will be determined by the Treasurer in accordance with the general directions of the Authority and professional Codes of Practice which are adopted from time to time.

### **REVENUE EXPENDITURE AND INCOME**

- 4.2 The revenue estimates for the next financial year will be prepared by the Fund Director in conjunction with the Treasurer in accordance with the general directions of the Authority. They will be presented to the Authority for approval accompanied by a report from the Treasurer which will specify any variations to the existing budget and policies together with implications for future years.
- 4.3 The Treasurer, the Fund Director and any Head of Service may incur expenditure for the supply of goods or materials or the execution of any work or services (excluding grants to voluntary bodies/outside organisations) without reference to the Authority or appropriate Committee provided that it is within the framework of the Authority's policy, included in approved revenue estimates as set out in these Regulations, and subject to compliance with the Authority's Contract Standing Orders.
- 4.4 Expenditure not covered by Regulation 4.3 must be submitted by the Treasurer to the Authority for approval. The report will include details of the financial implications for both the current financial year and 2 subsequent years.
- 4.5 The Treasurer (or officers nominated by him/her) shall ensure that the approved estimates are not overspent.
- 4.6 The Treasurer shall report on the outturn of income and expenditure to the Authority as soon as possible after the end of each financial year. The report will include details of any diversion of funds. (See virement - Regulation 4.7).

### **4.7 Virement and use of Reserves**

- (a) Revenue overspending or additional expenditure on specific budget heads (employees, premises, supplies and services, transport and support services but not debt charges) may be financed by diversions within the approved budget subject to the following directions. All such diversions of funds will be reported to the Authority as part of regular budget monitoring reports:
- Up to £10,000\* - In writing by the Fund Director
  - Above £10,000 up to £50,000 \* - In writing by the Treasurer
  - Over £50,000 - By the Authority following a report from the Treasurer
- \*This amount applies to individual transactions and the sum of transfers for any one purpose.
- (b) Diversions must not be used to finance expenditure which will recur in future years without the Authority's prior approval.
- (c) If diversion of funds is not possible to meet an unavoidable overspending, the Treasurer shall submit a report to the Authority seeking approval to a supplementary estimate. The Treasurer is responsible for advising the Authority on the financial implications of this course of action in the next quarterly budget monitoring report or using the Urgent Business Procedure as set out in the Authority's constitution.
- (d) The Treasurer can approve any additional expenditure where the costs are fully reimbursable from other authorities or bodies.
- (e) Income received in excess of the overall total income budgeted amount may be used to finance additional expenditure subject to the above limits in (a).

- (f) Transfers to and from Reserves will be the responsibility of the Treasurer and subject to the approval limitations shown in 4.7(a) and will be governed by policies approved by the Authority.

## **5. FINANCIAL SYSTEMS AND PROCEDURES**

### **5.1 Banking Arrangements**

#### **General**

- (a) The Treasurer is responsible for making the Authority's banking arrangements and is authorised to operate such bank accounts as are considered appropriate.
- (b) The arrangements shall be reviewed on a regular basis and the Treasurer or an authorised officer will undertake all negotiations with the Authority's banker(s) regarding banking terms and overdraft facilities.

#### **Cheques and Payment Documents**

- (c) All cheques, corporate purchasing cards and similar payment media, instruments or mechanisms, including electronic money, are to be ordered and managed only in accordance with arrangements approved by the Treasurer, who is to ensure their safe custody, issue and control.
- (d) Cheques drawn on the Authority's main bank accounts must either bear the facsimile signature of the Treasurer or be signed in manuscript by him/her or other authorised officers approved by the Treasurer. All alterations and amendments are to be signed in manuscript by the Treasurer or other authorised officer.
- (e) All cheques and other payment documents must be despatched by the Treasurer unless he/she has specifically given consent to other arrangements.
- (f) Arrangements for the authorisation of payments to be made by automatic transfer of funds from the Authority's bank accounts must be in a form agreed by the Treasurer.

#### **Imprest Accounts**

- (g) The Treasurer may make such imprest advances (either in cash or separate bank account) as he/she considers appropriate to nominated officers for the payment of expenses of the Authority.
- (h) The imprest will be operated in accordance with the arrangements specified by the Treasurer and issued in the form of a Financial Instruction under the authority of this Regulation.

### **5.2 Income**

- (a) The Treasurer must ensure that adequate arrangements are made for:
- the financial organisation and accounting to ensure the proper recording of all sums due to the Authority; and
  - the prompt and proper accounting of all cash including its collection, custody and deposit.
- (b) Save where the charges are fixed by statute, the Authority shall be responsible for determining whether a charge is to be made for any service provided by the Authority. The Treasurer shall be responsible for determining the level of charge to be fixed for any service, in accordance with the Authority's policies.
- (c) Employees of the Authority must not give receipts for monies received on behalf of the Authority on any form other than an official receipt form.
- (d) The procedures for dealing with the raising and despatch of accounts, receipt of payments and cash discrepancies will be specified by the Treasurer and issued in the form of a Financial Instruction under the authority of this Regulation.
- (e) Personal cheques must not be cashed out of moneys held on behalf of the Authority.
- (f) "Sales Ledger" - The writing-off of cash discrepancies and bad debts (save as otherwise provided by the Authority) by the following officers:
- not exceeding £5,000 Fund Director
  - above £5,000 up to £10,000 Treasurer
  - writing-off of sums in excess of this limit shall be referred to the Authority for approval.

- (g) The Authorisations granted under this Financial Regulation shall not apply to the approval of the writing-off of rent/interest, insurance premiums expenditure due in respect of any investment property or to investment losses or payroll over-payments which are subject to Financial Regulations 5.4(d) (e) and 5.8(d) respectively.

### **5.3 Insurance**

- (a) The general policy for insurance will be agreed by the Authority having received appropriate advice from the Treasurer.
- (b) The Treasurer is responsible for arranging all insurances and the administration and negotiation of claims.

### **5.4 Investments, Loans and Cash Flow**

- (a) The Treasurer is responsible for securing the arrangements for the Authority's cash flow, borrowing activities and lending activities, in accordance with the Local Government Act 2003 and the CIPFA Code of Practice on Treasury Management as applicable and the policies agreed by the Authority as amended from time to time.
- (b) All investments will be held in the name of the Authority or the Authority's authorised custodian bank nominee or equivalent or its agents. All securities in respect of loans raised will be issued in the name of the Authority.
- (c) The Treasurer shall prepare a policy document outlining the procedures to be adopted each year for cash flow (treasury management) for approval by the Authority. The Head of Finance and Corporate Services has day to day responsibility for administering the treasury management function in accordance with the Authority's strategy.
- (d) Any losses incurred as a consequence of the investment activity in accordance with the Local Government Pension Scheme Investment Regulations in force at the time are reported to the Authority and save as specified in Regulation 5.2 (f) above are not subject to the normal debt write off procedure.
- (e) Any losses incurred arising out of rent or interest, insurance premiums and other expenditure due in respect of any investment property not exceeding £10,000 by the Fund Director but the writing-off of sums in excess of this limit shall be referred to the Authority for approval.

### **5.5 Negotiated Settlements**

- (a) The Treasurer is authorised to negotiate the settlement of claims which require urgent decisions. Where this sum exceeds £20,000 a report will be submitted to the Authority using the urgent business procedure set out in the Authority's Constitution.

### **5.6 Orders for Work, Goods and Services**

- (a) Orders must be in a form approved by the Treasurer and before any order is issued, the authorising officer must ensure:
- that the cost is within an approved estimate or other financial provision;
  - compliance with EU and UK legislation;
  - compliance with the Authority's Standing Orders relating to Contracts i.e. quotations and formal tenders.
- (b) Orders must not be split or issued for a value less than known requirements as a means of avoiding compliance with the Authority's Standing Orders and these Regulations.
- (c) The control arrangements and administration of the ordering system will be in accordance with the Financial Instruction issued by the Treasurer under the authority of this regulation.

### **5.7 Payment of Accounts**

- (a) The Fund Director is responsible for the examination, verification and certification of invoices and any other payment vouchers.
- (b) The control arrangements and administration of the payment process will be in accordance with the Financial Instruction issued by the Treasurer under the authority of this Regulation.
- (c) Officers must not authorise any payment or benefit to themselves.

## **5.8 Salaries, Wages, Pensions, Gratuities and Allowances**

- (a) The payment of salaries, wages, pensions, gratuities and allowances to all current and former employees of the Authority, and pensioners of the Fund shall be made by the Treasurer under arrangements approved and controlled by him/her.
- (b) Appointments of all employees must be made in accordance with the regulations of the Authority and the approved establishments, grades and rates of pay and within the budgetary provision.
- (c) Time sheets and other records in a form and containing information required by the Treasurer for the recording and payment of salaries and wages must be signed in manuscript, or electronically authorised by officers authorised by the Treasurer. Officers must not authorise their own payment documents.
- (d) The writing-off of an overpayment of salary to an employee where there is a death in service and the overpayment of pension on the death of a pensioner may be approved by the following officers:
  - not exceeding £1,000 Head of Finance and Corporate Services
  - above £1,000 but not exceeding £5,000 Fund Director
  - above £5,000 but not exceeding £10,000 Treasurer
  - writing-off sums in excess of this limit shall be referred to the Authority for approval.
- (e) The control arrangements and administration of the payment process will be in accordance with the Financial Instruction issued by the Treasurer under the authority of this Regulation.

## **5.9 Travelling, Subsistence and Other Allowances**

- (a) All claims for payment of car allowances, subsistence allowances, travelling and incidental expenses shall be prepared by the claimant personally in a form approved by the Treasurer and in accordance with any Schemes of Conditions of Service adopted.
- (b) Officers must sign or electronically endorse their claims as correct and confirm that they comply with the approved Schemes. Officers must not authorise their own claims for payment.
- (c) The control arrangements and administration of the payment process will be in accordance with the Financial Instruction issued by the Treasurer under the authority of this Regulation.

## **6. RISK MANAGEMENT AND CONTROL OF RESOURCES**

### **6.1 General**

- (a) It is essential that robust, integrated systems are developed and maintained for identifying and evaluating all significant risks to the Authority.

### **6.2 Risk Management**

- (a) The Authority is responsible for approving the risk management policy statement and strategy and for reviewing the effectiveness of risk management.
- (b) The Treasurer is responsible for preparing the Authority's risk management policy statement and strategy and promoting it throughout the Authority. The Treasurer and the Fund Director are responsible for advising the Authority on corporate risks facing the Authority.
- (c) The Treasurer and the Fund Director must ensure that they regularly review risks, develop appropriate risk management controls and ensure that risk registers are maintained.

### **6.3 Internal Control**

- (a) The Treasurer is responsible for advising the Authority on effective systems of internal control. Internal control refers to the systems of control devised by management to help ensure the Authority's objectives are achieved in a manner that promotes economical, efficient and effective use of resources and that the Authority's assets are safeguarded. They should ensure that public funds are properly safeguarded and used economically, efficiently, and in accordance with the statutory and other authorities that govern their use.

- (b) It is the responsibility of senior officers to establish sound arrangements for planning, appraising, authorising and controlling their operations in order to achieve continuous improvement, economy, efficiency and effectiveness and for achieving their performance targets. Senior officers should also ensure that such internal control arrangements are regularly reviewed for adequacy and effectiveness.
- (c) The Treasurer must ensure that the system on internal control is reviewed at least annually and that an Annual Governance Statement is submitted to the Authority for approval and inclusion in the Statement of Accounts.

#### **6.4 Asset Security**

- (a) The Fund Director is responsible for the accountability and control of staff and for maintaining proper security at all times for all stocks, stores, furniture, equipment, cash etc. under his/her control.
- (b) The Treasurer shall specify maximum limits for cash holdings which shall not be exceeded without his/her express permission.
- (c) Keys to safes and similar receptacles containing cash and valuable property must be securely held at all times. A register of keys and their holders shall be maintained by the Fund Director. The loss of any such keys must be reported to the Fund Director immediately.

#### **6.5 Data Security**

- (a) In accordance with the provisions of the various legislation relating to Data Protection, the Clerk shall maintain up to date registrations on behalf of the Authority, and in consultation with the Fund Director shall nominate an officer to act as Data Protection Officer for the Authority.

#### **6.6 Gifts, Hospitality, Secondary Employment**

- (a) Further information about gifts, hospitality and relationships with clients and contractors is contained in the code of conduct.

##### **Gifts**

- (b) The receipt of personal gifts should be discouraged. If an officer, during the course of, or as a result of, official duties, receives any personal gift, other than one of only token value, the matter must be reported to the Fund Director who will:
  - decide if the item is to be returned or forwarded to some charitable cause;
  - notify the donor what has happened to the gift and explain the reason why gifts should not be offered or sent in the future.
- (c) A central record must be maintained by the Fund Director of all gifts (other than those of a token value) received by and offered to staff and the action taken.

##### **Hospitality**

- (d) Hospitality must only be given or accepted where it is on a scale appropriate to the circumstances, not extravagant and justifiable as in the public interest. It must be apparent that no cause could reasonably arise for adverse criticism or suggestion of improper influence about the acceptance of the hospitality.
- (e) The circumstances and the type of hospitality is to be recorded in a central record maintained by the Fund Director.

##### **Secondary Employment**

- (f) Officers who are, in accordance with their conditions of service, permitted to carry out private or other paid work must not do so during the Authority's time, nor must they use the Authority's premises, resources or facilities for the execution of such work without the prior approval of the Fund Director (or the Clerk where the officer is the Fund Director).
- (g) Officers must declare to the Fund Director in writing the nature and duration of such private work (or the Clerk where the officer is the Fund Director).
- (h) No stationery or publicity material is to indicate that the officer is an Authority employee nor should the address or telephone number of the Authority be stated.
- (i) Officers must not work for any current or prospective supplier or contractor to the Authority.



- (j) In cases where an officer's duties involve contractual arrangements with any prospective supplier or contractor who employs a close relative or friend of the officer, the officer must notify the Clerk or the Fund Director of the details and preclude himself/herself from the arrangements.

#### **6.7 Internal Audit**

- (a) Internal Audit is an independent, objective assurance and consulting function designed to add value to and improve the Authority's operations. It helps the Authority accomplish its objectives by bringing a systematic, and disciplined approach to the evaluation and improvement of the effectiveness of risk management, control and governance processes. As such Internal Audit provides a significant source of assurance in relation to the effective operation of both the Authority's governance arrangements and its system of internal control.
- (b) The Treasurer has delegated responsibility for maintaining a continuous, adequate and effective internal audit of the Authority's accounting records and its system of internal control in accordance with the Accounts and Audit Regulations.
- (c) Due to the scope of internal audit work, the Fund Director has a direct interest and will be consulted on planned work and will be able to request specific systems audits and value for money audits.
- (d) The Treasurer will advise the Audit Committee as to the appropriate level of internal audit resource and plan required in any year and will have the authority to approve variations to the plan and level of resource in the light of changed circumstances.
- (e) The key conditions for Internal Audit are that:
- It is independent in its planning, operation and reporting;
  - It supports the Fund Director (as Head of Paid Service) and the Treasurer in fulfilling their statutory responsibilities;
  - The Head of Internal Audit has direct access to the Treasurer, the Fund Director, the Monitoring Officer and Members of the Authority;
  - The service is provided in accordance with the Public Sector Internal Audit Standards (PSIAS).
- (f) The functions of Internal Audit are to:
- Review and appraise the systems of financial and management control and the corporate governance arrangements, including the management of risks and safeguarding of assets;
  - Assess the accuracy of financial and other published information;
  - Ascertain the extent of compliance with procedures, policies, regulations and legislation;
  - Review whether functions are being carried out as planned and that objectives and goals are being met;
  - Undertake value for money reviews to assess the economy, efficiency and effectiveness with which resources are employed;
- (g) In fulfilling these functions Internal Audit will:
- Work in partnership with Senior Officers, particularly in relation to value for money projects and other review functions;
  - Work in partnership with the Authority's appointed external auditors, and any other relevant external review agencies in providing a comprehensive audit function;
  - Develop and maintain a quality assurance improvement programme (QAIP).
- (h) Internal Audit staff as authorised representatives of the Treasurer will, subject to satisfactory proof of identity, have authority
- Enter at all reasonable times any premises or land occupied or controlled by the Authority (excluding investment properties);
  - Have access to all property, records, documents and correspondence relating to any financial and other activities of the Authority;

- Require and receive such explanations as are necessary concerning any matters under examination;
  - Require any employee or agent of the Authority to produce cash, stores or any other Authority property under his/her control.
- (i) The Treasurer shall make arrangements to ensure that he/she is informed, via the Head of Internal Audit, as soon as is practicable whenever any matter arises which involves, or is thought to involve, irregularities concerning cash, stores or other property of the Authority or any suspected irregularity in the exercise of the functions of the Authority, irrespective of whether the matter is the subject of criminal investigation.
- (j) The Treasurer must ensure that a reply is made to any audit report within a reasonable period of time, but in any case within 6 weeks of the date of its issue by the Head of Internal Audit.

#### **6.8 Inventories**

- (a) The Fund Director shall ensure that an inventory is maintained of furniture, fittings, equipment, plant and machinery and he/she shall be responsible for carrying out at least an annual check of all such items against the inventory and for taking action in relation to surpluses and deficiencies and noting the inventory accordingly.
- (b) The writing-off of items may be approved by the following officers:
- not exceeding £10,000 Fund Director
  - above £10,000 but not exceeding £20,000 Treasurer
  - The writing-off of items in excess of this limit shall be referred to the Authority for approval.
- (c) The Fund Director is responsible for ensuring that the Authority's property is not removed otherwise than in accordance with the ordinary course of the Authority's business or used otherwise than for the Authority's purposes.
- (d) Surplus or obsolete inventory items shall be disposed of as economically advantageously as possible.

#### **6.9 Property**

##### **6.9.1 Operational Property**

- (a) The Head of Finance and Corporate Services is responsible for securing the arrangements for management of properties occupied by the Authority for operational purposes, including maintenance.
- (b) The arrangements will include the maintenance of property registers which will record:
- locations and plan references;
  - the purpose for which held;
  - purchase/lease details;
  - rents payable and particulars of tenancies granted.

##### **6.9.2 Investment Properties**

- (a) The Head of Investment Strategy is responsible for securing the arrangements for management of the Authority's investment properties, including maintenance.
- (b) The arrangements will include the maintenance of property registers by agents on behalf of the Authority which will record:
- locations and plan references;
  - the purpose for which held;
  - purchase/lease details;
  - rents payable and particulars of tenancies granted.

#### **6.10 Theft and Burglary**

- (a) The Treasurer shall arrange for all cases of theft or burglary arising in any part of the Authority's operations to be notified to him/her via the Head of Internal Audit, including those where criminal investigations are being undertaken.

#### **6.11 Preventing Fraud and Corruption**

- (a) The Treasurer is responsible for the development and maintenance of an anti-fraud and corruption strategy.
- (b) The Fund Director is responsible for:
  - Ensuring that staff are aware of the requirements of the Bribery Act 2010; and
  - That sound internal controls are maintained to prevent bribery occurring in connection with the conduct of the Authority's business affairs.