

Subject	Anti-Fraud, Bribery and Corruption Policy and Whistleblowing Policy	Status	For Publication
Report to	Authority	Date	12 December 2024
Report of	Head of Governance and Corporate Services		
Equality Impact Assessment	Not Required	Attached	No
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1 Purpose of the Report

- 1.1 To present for approval the Anti-Fraud, Bribery and Corruption Policy and Whistleblowing Policy.

2 Recommendations

- 2.1 Members are recommended to:
- a. Approve the Anti-Fraud, Bribery and Corruption Policy and the Whistleblowing Policy.**

3 Link to Corporate Objectives

- 3.1 This report links to the delivery of the following corporate objective:
Effective and Transparent Governance

To uphold effective governance always showing prudence and propriety.

- 3.2 The contents of this report are part of the arrangements in place to ensure good governance and a suitable framework for the prevention and detection of fraud, and reporting of concerns.

4 Implications for the Corporate Risk Register

- 4.1 The contents of this report will contribute to addressing overall risk to the Authority's funds and reputation.

5 Background and Options

- 5.1 The action plan arising from the Annual Governance Statement approved by the Authority in June 2024 included an action to review and update the organisation's policies on Anti-Fraud, Bribery & Corruption and Whistleblowing (or Confidential

Reporting Procedure). The policies were overdue for review, having last been updated in 2019.

- 5.2 Both policies form part of the Authority’s arrangements for ensuring and demonstrating that we meet the principles of good governance set out in the CIPFA/SOLACE framework. These policies relate to Principle A – behaving with integrity, demonstrating strong commitment to ethical values and respecting the rule of law. The two policies have been reviewed and fully updated.
- 5.3 **Appendix A - Anti-Fraud, Bribery and Corruption Policy** – This policy sets out the objectives, including the promotion of an anti-corruption culture and zero tolerance of fraud and corruption. The document provides details of the Authority’s approach to achieving this, the roles and responsibilities of different stakeholders and actions that will be taken for preventing, deterring and detecting fraudulent activity or corruption. The policy also sets out a clear commitment to taking all necessary actions to pursue recovery of any losses and impose sanctions in the event of fraud or corruption being found.
- 5.4 **Appendix B – Whistleblowing Policy** - This policy makes it clear that any referral can be made without fear of victimisation, subsequent discrimination, or disadvantage. The policy is intended to encourage and enable employees to raise serious concerns within the Authority rather than overlooking a problem or ‘blowing the whistle’ outside.
- 5.5 Both policies were presented to the Audit & Governance Committee who have recommended them for approval to the Authority.
- 5.6 The policies will be reviewed every 2 years as a minimum, or sooner if required in the event of legislative or other substantive changes. Any material changes will be taken to the Audit & Governance Committee for review and to the Authority for approval.

6 **Implications**

- 6.1 The proposals outlined in this report have the following implications:

Financial	No direct implications.
Human Resources	No direct implications.
ICT	No direct implications.
Legal	No direct implications.
Procurement	No direct implications.

Jo Stone

Head of Governance and Corporate Services & Monitoring Officer

Background Papers	
Document	Place of Inspection