ANTI-FRAUD AND CORRUPTION POLICY

TOTNES TOWN COUNCIL
AGREED JULY 2025
NEXT REVIEW JULY 2027

1. PURPOSE AND SCOPE

Totnes Town Council is committed to maintaining the highest standards of openness, integrity, and accountability in its operations. This Anti-Fraud and Corruption Policy sets out the Council's commitment to preventing and detecting fraud, corruption, bribery, and other dishonest behaviour, whether attempted internally or externally.

This policy applies to:
- All elected Members
- Council employees and volunteers
- Contractors, suppliers, and partners acting on behalf of the Council

The Council has a complementary Whistleblowing Policy, which provides mechanisms for reporting concerns confidentially.

2. DEFINITIONS

Fraud: The deliberate use of deception to obtain an unfair or unlawful gain. This includes falsifying records, misappropriating assets, or abusing a position of trust.

Corruption: The abuse of power for personal gain, including bribery, extortion, or offering/accepting inducements to influence actions.

Bribery: As defined under the Bribery Act 2010, bribery includes offering, giving, receiving, or soliciting something of value to influence a function improperly.

3. CORE PRINCIPLES

- Promote a culture of honesty, integrity, and accountability
- Proactively prevent, detect, and investigate fraudulent and corrupt activities
- Pursue disciplinary or legal action where appropriate
- Protect whistleblowers and ensure a safe environment for reporting concerns

4. ROLES AND RESPONSIBILITIES

4.1 Elected Members

Councillors must act in accordance with:
- The Councillor Code of Conduct
- The Nolan Principles (Appendix 1)
- The Council's Standing Orders and policies

They must declare interests and gifts/hospitality as required and report any suspicion of fraud.

4.2 Town Clerk (Responsible Financial Officer)

The Town Clerk is responsible for:
- Communicating and implementing this policy
- Ensuring compliance with Financial Regulations
- Promoting a culture of integrity
- Investigating reported irregularities and referring matters as necessary

4.3 Employees

Employees are expected to:
- Uphold the Council's values
- Comply with internal controls and reporting requirements
- Avoid conflicts of interest
- Report concerns via the Whistleblowing Policy

Failure to comply may result in disciplinary action, including dismissal.

4.4 Internal and External Audit

Internal audit reviews the adequacy of controls and makes recommendations.

External audit evaluates financial integrity and governance, reporting findings to the Council.

5. PREVENTION MEASURES

Recruitment: All new employees and councillors must undergo appropriate checks, including references and, where applicable, DBS checks.

Training: Councillors and staff will receive regular training to identify, prevent, and report fraud and corruption.

Separation of Duties: Roles and responsibilities are structured to reduce opportunities for unauthorised actions.

Declarations: Interests, gifts, and hospitality must be disclosed and recorded.

6. DETECTION AND REPORTING

Internal control systems are designed to identify irregularities.

All concerns of fraud or corruption should be reported confidentially to the Town Clerk or through the Whistleblowing Policy.

All reports will be investigated promptly and fairly.

If fraud is substantiated, the Council will refer the matter to the police and seek to recover any losses.

7. DETERRENCE

The Council will take firm action against fraud and corruption.

Publicity may be used to deter future misconduct and demonstrate commitment to integrity.

Where financial loss occurs, recovery of losses will be pursued, including through civil recovery or insurance.

8. REVIEW AND MONITORING

This policy will be reviewed biennially or following significant incidents or changes in legislation. The Town Clerk is responsible for ensuring it remains effective and up-to-date.

APPENDIX 1 – The Nolan Principles (Seven Principles of Public Life)

1. Selflessness
2. Integrity
3. Objectivity
4. Accountability
5. Openness
6. Honesty
7. Leadership