

Old Catton Parish Council

Anti-Fraud, Corruption and Theft Policy

1. Introduction

Old Catton Parish Council is committed to the highest standards of openness, honesty and accountability in the conduct of its business. The Council will not tolerate fraud, corruption, bribery or theft in any form and will deal robustly with those who seek to defraud the Council, its residents or partners.

Members and employees are expected to conduct themselves in accordance with:

- Seven Principles of Public Life (Nolan Principles)
- Members Code of Conduct (Localism Act 2011)
- Relevant Authorities (General Principles) Order 2001
- Bribery Act 2010
- Fraud Act 2006
- Theft Act 1968

For the purpose of this Policy, *fraud*, *corruption* and *theft* are defined as follows:

Fraud

The intentional distortion of financial statements of other records by persons carried out to conceal the misappropriation of assets or to secure an unlawful benefit.

Corruption/Bribery

The offering, giving, soliciting or acceptance of any inducement or reward which may improperly influence a person's actions. This includes failure to declare conflicts of interest and hospitality where this results in personal gain.

Theft

The dishonest appropriation of property belonging to another with the intention of permanently depriving the owner of that property.

This Policy sets out the measures in place to prevent, detect and respond to fraud, corruption and theft.

2. Culture of Openness, Honesty and Integrity

The Council promotes a culture where:

- Fraud and corruption are regarded as unacceptable
- Concerns can be raised without fear of reprisal
- Public funds are safeguarded

The Council encourages employees, Members, contractors and the public to report concerns. Victimisation of anyone raising a genuine concern will not be tolerated.

The Council supports and operates within the Public Interest Disclosure Act 1998 (whistleblowing legislation).

is committed to the prevention, detection and investigation of all forms of fraud, corruption and theft. This is firstly achieved by promoting a culture of openness, honesty and fairness in all Council activities.

3. Legislative and Regulatory Framework

This Policy supports compliance with:

- Fraud Act 2006
- Bribery Act 2010
- Theft Act 1968
- Local Government Act 1972 9x151)
- Localism Act 2011
- Accounts and Audit Regulations 2015
- Regulation of Investigatory Powers Act 2000
- Proceeds of Crime Act 2002
- Uk General Data Protection Regulation and Data Protection Act 2018

The Clerk and Responsible Financial Officer is the Section 151 Officer responsible for ensuring adequate financial systems and controls.

4. Prevention

Councillors

Members must:

- comply with the Code of Conduct
- declare disclosable pecuniary and personal interests
- register gifts and hospitality
- use Council resources legally and prudently

Employees

The Council seeks to appoint employees of the highest integrity through:

- verified identity and right-to-work checks
- references
- role-appropriate vetting where required

Disciplinary action will be taken where fraud or theft is proven, alongside referral to the Police if appropriate.

Conflicts of Interest

Members and employees must avoid conflicts and must:

- declare interests
- remove themselves from decision-making where appropriate
- not misuse confidential information

Procurement and Contractors

The Council will:

- require transparency from suppliers
- avoid single-person control of purchasing

- maintain proper separation of duties
- include anti-bribery clauses in contracts where appropriate

Bribery Act 2010 – Adequate Procedures

The Council will:

- maintain registers of interests, gifts and hospitality
- provide awareness training where appropriate
- promote a zero-tolerance culture
- ensure decisions are recorded and transparent

5. Deterrence

The Council will:

- Take disciplinary action against employees found to have committed fraud, theft or corruption.
- Refer serious cases to the Police or Action Fraud
- seek recovery of losses where possible
- publicise proven cases where it is in the public interest

6. Detection & Investigation

The Council operates systems of financial and management control including:

- Standing Orders and Financial Regulations
- Internal Audit arrangements
- Risk assessment and management processes

Fraud may be detected through internal control, audit, whistleblowing or public reporting.

Investigations will:

- Be undertaken promptly and fairly
- Preserve evidence
- comply with UK GDPR and Data Protection Act
- comply with Regulation of Investigatory Powers Act where relevant

Where appropriate, the Council will work with:

- Norfolk Constabulary
- Appointed External Auditor
- Action Fraud
- HMRC and DWP where relevant

7. Reporting Suspected Fraud, Theft or Corruption

7.1 Members of the public or outside organisations

Concerns should be reported in writing, marked **CONFIDENTIAL**, to:

Clerk & Responsible Financial Officer

Old Catton Parish Council

The Pavilion, Recreation Ground

Church Street

Old Catton

Norwich NR6 7DS
clerk@oldcattonparishcouncil.co.uk

7.2 Where the allegation concerns the Clerk

Concerns should be reported in writing, marked **CONFIDENTIAL**, to:

Chairman of the Council

Via the above postal address

7.3 External reporting options include

- Action Fraud (UK national fraud reporting centre)
- Norfolk Constabulary
- Local Government & Social Care Ombudsman
- National Audit Office
- Information Commissioner's Office

The identity of reports will be kept confidential where lawful and practicable.

8. Data Protection and Confidentiality

Personal data collected in the course of investigations will be:

- Processed lawfully and fairly
- Kept secure
- Retained only as long as necessary
- Shared only where legally justified

Individuals may have restricted access rights during an active investigation in order to prevent prejudice to prevention and detection of crime

9. Awareness and Training

The Council will:

- Provide awareness training to Members and staff as appropriate
- Review this Policy annually
- Periodically review fraud risks

10. Conclusion

The Council is committed to safeguarding public funds and maintaining high standards of conduct. All Members, employees, contractors and the public are encouraged to support this commitment by reporting any concerns.

Adopted: 14th February 2022

Revised and Adopted" 12th January 2026

Appendix A

What should you do, as a member of the public or an outside organisation, if you suspect fraud, theft or corruption?

Please note that your identity and personal details will be kept confidential in most cases by the Council. The Council will only divulge them when the law requires this or with your consent.

10.1 Make an immediate note of your concern

Note all relevant details: what was observed, details of conversations, the date, time and name of the parties involved. Do not attempt to investigate the matter yourself.

10.2 Convey your suspicions in writing, marked CONFIDENTIAL, to:

Ms Sarah Vincent
Clerk of the Council
Old Catton Parish Council
The Pavilion, Recreation Ground
Church Street
Old Catton
Norwich NR6 7DS

If, after raising your suspicions, you are not satisfied with the action taken, you may wish to take the matter outside Old Catton Parish Council to one of the following organisations:

- The Audit Commission (<http://www.audit-commission.gov.uk/>)
- Norfolk Constabulary (<http://www.norfolk.police.uk/>)
- The Local Government Ombudsman (<http://www.lgo.org.uk/>)
- The National Audit Office (<http://www.nao.org.uk/>)
- HM Revenue & Customs (<http://www.hmrc.gov.uk/>)
- The Department for Work & Pensions (<https://www.gov.uk/government/organisations/department-for-work-pensions>)
- The Information Commissioner's Office (<http://www.ico.org.uk/>)
- The Serious Fraud Office (<http://www.sfo.gov.uk/>)

Appendix B

THE GENERAL PRINCIPLES

Selflessness: Members should only serve the public interest and should never improperly confer and advantage of disadvantage on any person.

Honest & Integrity: Members should not place themselves in situations where their honesty and integrity may be questioned, should not behave improperly and should on all occasions avoid the appearance of such behaviour.

Objectivity: Members should make decisions on merit, including when making appointments, awarding contracts or recommending individuals for rewards or benefits.

Accountability: Members should be accountable to the public for their actions and the manner in which they carry out their responsibilities and should co-operate fully and honestly with any scrutiny appropriate to their particular office

Openness: Members should be as open as possible about their actions and those of their authority and should be prepared to give reasons for those actions.

Personal Judgement: Members should take account of the views of others, including their political groups, but should reach their own conclusions on the issues before them and act in accordance with those conclusions.

Respect for Others: Members should promote equality by not discriminating unlawfully against any person, and by treating people with respect, regardless of their race, age, religion, gender, sexual orientation or disability. They should respect the impartiality and integrity of the authority's statutory officers and its other employees.

Duty to Uphold the Law: Members should uphold the law and, on all occasions, act in accordance with the trust that the public is entitled to place in them.

Stewardship: Members should do whatever they are able to do to ensure that their authorities use their resources prudently and in accordance with the law.

Leadership: Members should promote and support these principles by leadership, and by example, and should act in a way that secures or preserves public confidence.