



Anti-Fraud, Bribery & Corruption Strategy 2025 to 2028

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1. Introduction

- 1.1 The strategy outlines the comprehensive approach Worcestershire County Council has to prevent, detect and respond to fraud, bribery and corruption within the organisation. It aims to foster a culture of integrity, transparency and accountability and to protect the community.
- 1.2 Worcestershire County Council and Worcestershire Pension Fund takes its responsibilities to protect the public purse very seriously. It is fully committed to the highest ethical standards to ensure the proper use and protection of public funds and assets. Where Worcestershire County Council is referenced in this document it encompasses the Worcestershire Pension Fund as well.
- 1.3 This strategy sets out the Council's position in relation to countering fraud, bribery and corruption. Theft is also considered part of this Strategy. It has the full support of the Council's Audit and Governance Committee and Senior Management Team.
- 1.4 The complexities, types and scale of public spending means the risk of fraud, bribery and corruption remains a key issue for local government to manage. Fraud, bribery and corruption can be difficult to identify and often only the instances of fraud that have been discovered are reported. It is essential that Worcestershire County Council has a strategic response to fraud, bribery and corruption that focuses on minimising the risks and proactively takes measures to prevent it occurring, keeping every pound safe and providing value for money for all we do for Worcestershire residents.
- 1.5 The Strategy underpins Worcestershire County Council goals and ambitions in seeking to ensure sound governance. It supports the enabling of greater engagement with employees, elected members, contractors, the community, and partners, whilst protecting the public purse. The expectation of Worcestershire County Council is that Members and the workforce at all levels will lead by example to ensure the highest standards of probity, accountability is established and strictly adhered to, and that personal conduct is above reproach. Every employee and Member have a responsibility to be vigilant and report any suspicions that fraud, theft, bribery or corruption have been, are being or may be committed.
- 1.6 This Strategy is based upon comprehensive ongoing risk assessments in all areas of Worcestershire County Council activity, to reduce losses from fraud, bribery and corruption, through:
 - Reinforcing an organisational culture of zero tolerance to fraud, bribery and corruption.
 - Encouraging prevention.
 - Pro-actively detecting fraud, bribery and corruption.
 - The instigation of legal, disciplinary and recovery action against any individual found to have acted fraudulently or corruptly in their relationship and dealings with the Council.
 - Ensuring a strong control environment.
- 1.7 Any proven fraud, bribery or corruption will be dealt with in a consistent and proportionate approach. Appropriate sanctions and redress will be pursued against anyone perpetrating, or attempting to perpetrate, fraud and every effort will be made to recover any losses incurred by the Council because of fraud, theft or corruption.
- 1.8 Internal Audit is provided by an in-house team and provides a strategic and tactical counter fraud service which includes independent investigation. It aims to reduce fraud and misappropriation to zero to maximise the Council's financial and operational resources.

2. Strategy

- 2.1 This Strategy is underpinned with the Anti-Fraud, Bribery and Corruption Policy. The Strategy sets out the key objectives, responsibilities, fraud prevention, actions to take if fraud is suspected and the management response.
- 2.2 The Strategy provides a strategic approach to minimise fraud and corruption consistent with that outlined in the Local Government Fraud Strategy 'Fighting Fraud and Corruption Locally'. FFCL - Strategy for the 2020's.pdf (cifas.org.uk) . The five key themes of this approach are Govern, Acknowledge, Prevent, Pursue and Protect. These are summarised below:



- 2.3 The Council is committed to an effective anti-fraud and corruption culture, by promoting high ethical standards and encouraging the prevention and detection of fraudulent activities. Worcestershire County Council has a zero-tolerance stance on all forms of fraud, bribery and corruption. The Council will thoroughly investigate all suggestions of fraud, bribery or corruption which it recognises can:

- Undermine the standards of public service that the Council is attempting to achieve,
- Reduce the level of resources and services available for the residents of Worcestershire,
- Result in major consequences which will reduce public confidence in the Council.

3. Definitions

Fraud.

3.1 Fraud is defined by the Fraud Act 2006.

3.2 The term fraud commonly includes activities such as theft, deception, bribery, forgery, extortion, conspiracy, and money laundering. These include, but are not confined to, the specific offences in the Fraud Act 2006. A person can commit fraud by acting dishonestly by attempted or actual acts for personal gain or orchestrating financial loss against Worcestershire County Council.

3.3 The Fraud Act 2006 identified three criminal offences of fraud by:

- False representation
- Failure to disclose information
- Abuse of position.

Corruption

3.4 Corruption is not defined in any specific act of legislation but is closely linked to the Bribery Act 2010.

3.5 It can be described as the deliberate misuse of entrusted power or position for direct or indirect personal gain. Entrusted power covers elected position, paid or unpaid employment. Corruption includes offering, giving, requesting or accepting bribe or reward, which influences a person's actions or the actions of someone else.

Bribery

3.6 Bribery is defined by The Bribery Act 2010.

3.7 It is defined as "giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward a person for having already done so, in order to gain personal, commercial, regulatory or contractual advantage".

3.8 There are four main offences connected to the improper performance of a function, simplified as the following:

- giving or offering an inducement to commit a corrupt act,
- receiving or soliciting an inducement to commit a corrupt act,
- bribery of foreign public officials,
- failure to prevent bribery (corporate offence).

Theft

3.9 Theft is defined by the Theft Act 1968.

3.10 Theft is the dishonest appropriation of cash or other tangible assets. A person is guilty of "theft" by dishonestly taking property belonging to someone else with the intention of permanently depriving the owner of it.

3.11 The Act also includes the dishonesty offence of "false accounting". This relates to the destruction, defacement, concealment or falsification of any document used for accounting purposes.

Money Laundering

3.12 Money laundering is a term used for several offences which involve manipulating the proceeds of crime or terrorist funds so that they appear to have come from a legitimate source.

3.13 Money laundering involves one of three principal offences:

- Acquisition, use of possession; or
- Concealing; or
- Arranging.

3.14 Worcestershire County Council acknowledges the burden of identifying potential money laundering activity. Any service that receives money from an external person or body is potentially vulnerable to money laundering. Vigilance is a vital defense to mitigate money laundering and any suspicion regarding the appropriateness of a transaction can be reported to the Money Laundering Reporting Officer.

4. Scope

4.1 This strategy applies to:

- All Worcestershire County Council employees (including volunteers and agency staff) and Councillors;
- Employees and Committee Members of Council funded voluntary organisations;
- Partner organisations;
- Council contractors, suppliers and consultants;
- Council maintained schools;
- NHS Partners;
- Service users and
- Worcestershire residents.

5. Aims & Objectives

5.1 Using the Internal Audit Team and the vigilance of the employees, the Council will protect its resources ensuring they are not lost to fraud but are used to the benefit of the residents and visitors of Worcestershire.

5.2 The Council will work together to:

- Ensure that the Council is protected against fraud and loss,
- Create a "counter-fraud" culture which highlights the Council's zero-tolerance of fraud, corruption or theft, which defines roles and responsibilities and activity,
- engages all stakeholders (the public, Members, employees at all levels and policy makers),
- Proactively deters, prevents and detects fraud, corruption and theft,
- Investigates suspected or detected fraud, corruption and theft,
- Enables the council to apply appropriate sanctions and recover all losses,
- Provides recommendations to inform policy, system and control improvements, thereby reducing the Council's exposure to fraudulent activity.

6. Principles

- 6.1 The Council will not tolerate the abuse of its services or resources and has high expectations of propriety, integrity and accountability from all parties identified within this Strategy.
- 6.2 The Council will ensure that the level of resources dedicated to counter-fraud activities are sufficient and all those involved are trained to deliver a professional counter fraud service to the highest possible standards.
- 6.3 Fraudulent activity is unacceptable and will result in disciplinary, legal and/or criminal action against the individual(s) concerned.
- 6.4 The Council will pursue the repayment of any financial or other gain from individuals involved in malpractice and wrongdoing.
- 6.5 The Council will ensure consistency, fairness and objectivity in all fraud investigation work and that everyone is treated equally.
- 6.6 The Council will work with its partners (such as the Police, District Councils, and other investigative bodies) to strengthen and continuously improve its arrangements to prevent fraud and corruption.
- 6.7 Effective corporate governance procedures and positive employee engagement are a strong safeguard against fraud and corruption. Adequate supervision, recruitment and selection, scrutiny and healthy challenge shapes attitudes and values, creating an environment opposed to fraudulent activity.
- 6.8 Whilst all stakeholders in scope have a part to play in reducing the risk of fraud, Worcestershire County Council Members, Directors and Management are ideally positioned to influence the ethical tone of the organisation and play a crucial role in fostering a culture of high ethical standards and integrity.
- 6.9 Regular risk assessments will be conducted to identify areas vulnerable to fraud and corruption, policies and procedures will be developed to implement a clear anti-fraud, bribery and corruption culture and a strong internal control framework implemented and maintained.
- 6.10 The Council believes the best defense against fraud, bribery and corruption is to create a strong counter-fraud culture within the organisation. Honesty and openness are key to this culture. The codes of conduct for Members and employees are based upon the seven 'Nolan Principles' of standards in public life. The Nolan Principles are:

Selflessness: You must act solely in terms of the public interest and not in order to gain financial or other material benefits for yourself, family, or friends;

Integrity: You should not place yourself under any financial or other obligation to outside individuals or organisations that might seek to influence you in the performance of your official duties;

Objectivity: You must make choices on merit when making decisions on appointments, contracts, or recommending rewards and benefits for individuals;

Accountability: You are accountable for your decisions and actions to the public, and you must submit yourself to whatever scrutiny is appropriate;

Openness: You should be as open as possible about all decisions and actions that you take. You should give reasons for your decisions and restrict information only when the wider public interest clearly demands;

Honesty: You have a duty to declare any private interests relating to your work and you need to take steps to resolve any conflicts arising in the way that protects the public interest; and

Leadership: You should promote and support these principles by leadership and example.

7. Responsibilities

Stakeholder	Specific Responsibilities
Chief Executive (Head of Paid Service)	Ultimately accountable for the effectiveness of the Council's arrangements for countering fraud, bribery, corruption and theft.
Chief Financial Officer (Section 151 Officer)	To ensure the Council has in place an effective anti-fraud strategy, an effective internal control environment in place and there is an effective internal audit service in place to provide an objective view of the internal control environment.
Monitoring Officer (Head of Legal and Democratic Services)	To help ensure that the Council does not act unlawfully
Audit & Governance Committee	To monitor the Council's strategies and policies and consider the effectiveness of the Whistleblowing Policy and Anti-Fraud, Bribery and Corruption Strategy.
Members	To promote and support the Council's stance on fraud, bribery and corruption.
External Audit	A statutory duty to ensure that the Council has in place sound arrangements for the prevention and detection of fraud, corruption, bribery and theft.
Internal Audit	To develop and implement the Council's Anti-Fraud, Bribery and Corruption Strategy and to investigate any cases of suspected fraud reported under this Strategy or via the Whistleblowing Policy. To provide advice and reviews on the effectiveness of internal controls which are designed to reduce the risk of fraud, bribery, corruption and theft.
Directors, Assistant Directors and Service Managers	To promote employees awareness and ensure reported irregularities are immediately referred to ensure that strong internal controls are in place and that these are properly implemented.
Employees	To comply with Council policies and procedures, to be aware of the possibility of fraud, corruption, bribery and theft, and to report any genuine concerns to management and/or Internal Audit, taking into consideration, if necessary, the Whistleblowing Policy.
Public, Partners, Suppliers Contractors and Consultants	To be aware of the possibility of fraud, corruption and bribery against the Council and report any genuine concerns or suspicions.

8. Approach to Countering Fraud

8.1 Worcestershire County Council will fulfil its responsibility to reduce fraud and protect its resources by completing work in each of the following key areas:

Govern

8.2 Our control framework will be informed through a clear understanding of:

- the threat,
- emerging risks,
- trends, and
- savings that can be achieved by investing in countering fraud and corruption.

8.3 Use of technology and interrogation of data to assess vulnerability and proactively target higher risk areas is key. We will also be focusing on raising employee awareness of the risks of fraud and corruption and what they can do to prevent or identify it.

8.4 Management information and analytics provide a valuable source to inform directed testing. Analysing financial and performance data to target investigations and produce exception reports for management to question and challenge will be coordinated through Internal Audit and form a key part of information provided regularly to the Council's leadership.

8.5 The diversity of the services Worcestershire County Council provides, and the multiplicity of systems used to manage them, generates huge volumes of records and data. The main fraud detection process will place a reliance on the National Fraud Initiative to provide key matches and compare data from a variety of systems nationwide to identify anomalies, improve information sharing across services and inform the risk management process.

8.6 Whistleblowing remains the most common way that fraud and corruption is detected in large organisations. The Council will raise awareness and continually promote its Whistleblowing Policy and other associated policies and procedures ensuring all reports of suspected fraud or corruption are treated seriously and acted upon.

8.7 The Internal Audit service manage the online fraud reporting process and fraud hotline (01905 843222) where employees, partners and residents can register any concerns.

8.8 Worcestershire County Council has robust anti-fraud, bribery and corruption arrangements in place and promotes a strong anti-fraud culture, raises awareness and provides information on all aspects of its counter fraud work. Measures are embedded throughout the Council to promote an anti-fraud culture including reporting mechanisms, training for all employees, monitoring and evaluation, leadership commitment, publicising the results of proactive work and seeking the recovery of losses due to fraud.

Acknowledge

8.9 Worcestershire County Council will ensure strong measures are in place to prevent fraud. It has a Whistleblowing procedure, a fraud hotline and supports those who come forward to report suspected frauds. All reports are acted upon with an appropriate level of response. Malicious or vexatious allegations are not tolerated.

- 8.10 Internal Audit will work with managers and policy makers to ensure that any new and existing systems, procedures and policy initiatives consider fraud risks. Appropriate control frameworks need to be deployed and operate effectively to reduce the risk of fraud. Internal audit will work with management to reduce risk and ensure that new and existing systems and policy initiatives are fraud proofed. Internal Audit prioritises high risk areas to assist managers to identify and detect new types of fraudulent activity.

Prevent

- 8.11 Worcestershire County Council will look for opportunities to share data and fraud intelligence to increase the capability to uncover potential and actual fraud. Where systems and legislation allow the Council will make greater use of data and analytical software to prevent and detect fraudulent activity.
- 8.12 Worcestershire County Council are resolute that there is a culture and tone of honesty with zero tolerance towards fraud and corruption, as demonstrated through its behavioural framework and codes of conduct for employees and members. The right organisational culture will be continually reinforced by:
- Raising awareness of this Strategy and relevant Policies to new and existing employees.
 - Publicising the results of all proactive work, sanctions, investigations and recovery of losses due to fraud and corruption.
 - Increase and maintain public awareness of the facilities available to report concerns about fraud and corruption.
 - Provide mandatory eLearning for all employees
- 8.13 Worcestershire County Council understand the best way to fight fraud and corruption is to prevent it happening in the first place. Worcestershire County Council will continually work towards realigning counter fraud resources away from enforcement towards prevention, aiming to deter all would be offenders. Existing measures to prevent fraud and corruption continue to be embedded within current processes and policy across the whole organisation. Measures include:
- Identifying fraud prevention controls.
 - Promoting fraud prevention and provision of advice.
 - Investigating allegations of fraud and corruption.
 - Prosecuting and sanctioning offenders.
- 8.14 Preventative measures will be supported by the ongoing assessment of those areas most vulnerable to the risk of fraud and corruption, in conjunction with risk management arrangements and risk-based audit reviews. The reviews will support the development of effective, value-added counter fraud measures that also enhance the quality of our customer service.
- 8.15 A proactive and robust response to fraud, bribery and corruption which is embedded at the heart of an organisation will help to deter even the most determined fraudster. A proactive approach to promoting our culture and approach to anti-fraud, bribery and corruption, both internally to the council's employees and councillors, but also externally to the public, businesses, and partners will help to deter fraudulent actions.

Pursue

- 8.16 Fraud must not pay, and where fraud or corruption is discovered the full range of sanctions will be deployed, including:
- civil,
 - disciplinary,
 - and criminal action.
- 8.17 Every effort will be made to recoup losses and confiscate assets gained because of criminal activity.
- 8.18 Criminal prosecutions deter offenders and reinforce a culture of zero tolerance towards fraud. Successful prosecutions require cases to be professionally investigated ensuring all evidence is collected within the law. Investigative staff with the appropriate skills and access to specialist resources to secure effective prosecutions will be used. Worcestershire County Council will always publicise successful prosecutions.
- 8.19 Organised fraud can cross a range of organisations and services. Effective cooperation and joint working between local authorities and other agencies including the Police and NHS will be essential in the ongoing development of the Worcestershire County Council's strategic response.

Protect

- 8.20 Fraud has a detrimental and devastating impact on the community. Worcestershire County Council through education i.e. website as well as other factors including identification, prevention, enforcement and robust governance will seek to stamp out fraud practices in areas that it has direct control of. By stamping out fraud it will protect the public purse and ensure the maximum amount of funding is reaching the services it provides.
- 8.21 Worcestershire County Council will seek to protect itself against serious and organized crime. It will seek to protect itself from cyber-crime and protect itself from fraud risks by continually monitoring and developing the control frameworks in place.
- 8.22 Worcestershire County Council will endeavour to protect individuals against crime and protect against the harm that fraud can do to the community.

9. Reporting, Advice & Support

- 9.1 Worcestershire County Council expects all instances of fraud, bribery or corruption to be reported by its employees.
- 9.2 If employees suspect that any fraud, bribery or corruption activity is taking place (or has taken place) or think that actions may amount to them becoming an accessory, they must seek advice or disclose this as soon as possible to:
- Line Manager (if appropriate),
 - Chief Financial Officer,
 - Deputy Chief Financial Officer,
 - Monitoring Officer or
 - Chief Internal Auditor/Internal Audit.
- 9.3 Employees should contact one of the above as soon as is practicable, avoiding undue delays to report the incident. In the first instance, the report may be made on an informal / verbal basis. Employees will then be asked to complete a Proforma Disclosure Report. If reporting a potential fraud employees should be prepared to provide as much detail as possible including:
- Details of the people involved – name, address, company names, directorships, phone numbers, etc.
 - Why you are suspicious and full details of the nature of the involvement.
 - The dates of activities and where they took place.
 - How they were undertaken and any likely amounts of money or assets involved.
- 9.4 All concerns raised will be treated with discretion and in confidence. Based on the information provided a decision will be made regarding the next appropriate action. Once the employee has reported the matter, they must follow any directions given and NOT make any further enquiries themselves or alert anyone to the report as evidence can be contaminated.
- 9.5 The 'Whistleblowing' approach is available for reporting any wrongdoing and can be used to report fraud, bribery or corruption allegations.

10. Further Information

10.1 Worcestershire County Council will have full regard to relevant legislative and local strategy and policy requirements, including but not limited to:

- Regulation of Investigatory Powers Act
- Terrorism Act
- Proceeds of Crime Act
- Police and Criminal Evidence Act
- Money Laundering Regulations
- Fraud Act
- Bribery Act
- Competition Act
- Companies Act
- Fighting Fraud and Corruption Locally. A Strategy for the 2020's
- National Fraud Initiative
- Worcestershire County Council Constitution
- IT & Digital Policies and Strategies
- Local Government Transparency Code
- Members Code of Conduct
- Employees Code of Conduct
- Anti-Money Laundering Policy
- Anti-Fraud, Bribery and Corruption Policy
- Whistleblowing Policy

11. Strategy Review

11.1 The Chief Internal Auditor, Chief Finance Officer and Audit and Governance Committee will ensure the continuous review and amendment of this strategy (and associated policies) to ensure it remains compliant with good practice and meets the needs of the Council.