

Anti-Fraud and Corruption Policy

Overview

CAMBRIDGESHIRE COUNTY COUNCIL IS COMMITTED TO A ZERO-TOLERANCE STANCE ON FRAUD AND CORRUPTION.

The aims of this policy are to:

- Help Council staff identify when there are reasons to suspect fraud or corruption.
- Enable and encourage everyone to raise concerns relating to fraud, corruption, bribery, or theft by contacting: whistleblowing@cambridgeshire.gov.uk
- Provide a variety of alternative contacts with whom concerns can be raised.
- Give confidence to anybody raising concerns that they will be investigated seriously and in line with this policy.
- Show how concerns raised will be dealt with and escalated.
- Set out the Council's commitment to a zero-tolerance stance on fraud and corruption.
- Reinforce an anti-fraud culture across its employees and members.
- Outline measures already in place to prevent and detect fraud.

This policy has been developed in line with to the Council's core values, CIPFA best practice, and the statutory requirements set out by the Fraud Act 2006 and the Bribery Act 2010. The Council expects all its employees, members and associated persons to act legally, with integrity, and in accordance with the Council's values and policies at all times. Any concerns raised regarding possible instances of fraud or corruption will be investigated seriously.

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Anti-Fraud and Corruption Policy

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Anti-Fraud and Corruption Policy

1. Introduction

- 1.1. This Anti-Fraud and Corruption Policy sets out Cambridgeshire County Council's corporate approach to suspected fraud, theft, corruption and bribery. It explains how the Council seeks to maintain an anti-fraud culture, with zero tolerance for fraud and corruption.
- 1.2. The Council recognises that most people are honest and would never intentionally defraud the Council. This policy provides a safeguard against the risk of fraud as well as guiding staff, Members and service users on what to do if fraud or corruption is suspected.
- 1.3. This policy covers both internal and external fraud against the Council. As such, it applies to:
 - All members and employees of Cambridgeshire County Council;
 - Any person working for, or on behalf of, the Council. This includes contractors, consultants, or subsidiary agents who work for the Council;
 - All users of Cambridgeshire County Council services. This includes Cambridgeshire residents; those in receipt of money, goods or services from the Council; and those who communicate with the Council.
- 1.3 Please see Appendix 1 for a detailed breakdown of how this policy is relevant to different roles across the Council. This includes Council officers and members, staff at maintained schools, and contractors.

2. What is fraud and corruption?

2.1. What does fraud and corruption look like?

- 2.1.1 Fraud, corruption, and bribery can appear in many forms. These offences may be committed by individuals external to the Council, such as suppliers. Or they could be committed by individuals internal to the Council, such as Council staff. Technical legal definitions of these offences are included in Appendix 2. This policy covers:

- **Theft** of Council assets, including money;
- **Bribery** i.e. offering or accepting money (or other forms of advantage) to influence the actions of someone in charge of a public duty. Bribery can include inappropriate gifts and hospitality;
- **Fraud** i.e. a deception committed for financial or personal gain. For example, internal fraud could include a member of staff falsifying timesheets in order to get paid for overtime that was not worked. External fraud could involve an organisation submitting false information in order to get a grant payment;
- **Corruption** i.e. someone abusing their position to obtain any type of financial or personal advantage for themselves or others.

2.2. What are the warning signs of possible fraud or corruption?

2.2.1 To identify fraud and corruption taking place, staff and members should be alert for suspicious behaviour. This could include anything that just 'doesn't seem right'.

2.2.2 In the context of Cambridgeshire County Council, examples of some warning signs that might suggest possible internal fraud or corruption include:

- Individuals who refuse to follow Council policies and procedures. This is especially concerning with regards to policies which require financial approval, or where multiple people are supposed to be involved in a process, but one person insists on doing everything instead.
- Individuals applying pressure to staff to make decisions they would not normally make, or to cut corners.
- Individuals who have a very close relationship with a particular supplier or partner.
- Senior staff members becoming involved in low-level operational decision making.
- Cash or IT equipment going missing.
- Individuals submitting false information or documentation with the intent to gain from this. For example, this could include submitting false overtime or expenses claims. It would also include individuals lying about or falsifying their qualifications.
- Officers who repeatedly request to work extra hours or to work in the office outside normal business hours. Individuals who refuse to take holiday.

- Individuals who deliberately conceal information required by the Council. For example, staff who do not disclose convictions or outside interests which conflict with their role at the Council.

2.2.2 Examples of some warning signs to look out for that might suggest possible external fraud or corruption include:

- Contractors submitting false performance or financial information. This might be done to obtain payments or keep a contract.
- Service users, grant recipients or suppliers who refuse to engage with the Council. This could manifest as refusing or avoiding providing documentation when it is requested.
- Individuals providing false or misleading documentation in order to access services or advantages to which they are not entitled. For example, obtaining a direct payment, school place, or a disabled blue badge when they are not really eligible.
- Cyber crime such as 'phishing'. For example, officers may receive fake emails which appear to be from real suppliers requesting payment.

2.3. What should I do to prevent fraud and corruption?

- 2.3.1** Everyone can play a vital role in identifying and reporting any possible instances of theft, fraud or corruption. If you suspect theft, fraud or corruption, you must report it via the procedure set out at Section 3, below.
- 2.3.2** It's important to ensure you are familiar with the Council's policies and procedures, and that you follow them in the course of your work. Many different Council policies include requirements which are there to prevent fraud and corruption. You should also ensure that other staff you work with are following policies and procedures as well. If you work with contractors or partners who deliver services on behalf of the Council, you should ensure that they meet the same high standards of ethical conduct expected of Council staff.
- 2.3.3** Appendix 1 gives full details of the roles and responsibilities placed on different groups of staff, Members and partners in preventing and detecting fraud and corruption.

3. How can I raise concerns?

- 3.1. All staff and Members of the council **must** report concerns if they have any suspicion that theft, fraud or corruption may have occurred. If fraud or corruption is suspected, staff must not undertake an investigation themselves. This is because ad-hoc investigations risk accidentally compromising evidence (and making it inadmissible if the case did go to court). They also run the risk of tipping off the individual(s) under suspicion.
- 3.2. Concerns about theft, fraud or corruption should be reported to the Council's Internal Audit team. Alternatively, you can use the corporate Whistleblowing service.

Internal Audit	Whistleblowing Service
Internal.Audit@Cambridgeshire.gov.uk	Whistleblowing@Cambridgeshire.gov.uk
You can also contact the Head of Internal Audit & Risk Management directly: Mairead.Claydon@Cambridgeshire.gov.uk	More information on reporting concerns via the Whistleblowing service can be found in the CCC Whistleblowing Policy.

- 3.3. If you do not feel able to raise concerns through either of these routes, any of the named contacts in the Council's Whistleblowing Policy can be contacted instead. Members of the public can also report any concerns they have via the Internal Audit department or Whistleblowing service.
- 3.4. Internal Audit lead the corporate response to all whistleblowing referrals relating to theft, fraud, corruption and financial impropriety. They can ensure that an appropriate investigation will be undertaken. This reduces the risk of evidence being compromised or destroyed. Internal Audit also maintain records of suspected theft and fraud for the Council's transparency data.
- 3.5. Anybody who suspects that a crime is being committed can contact the police. The Internal Audit service will also refer reports to the police themselves when required. If theft is suspected, officers should also alert the Council's Insurance team.

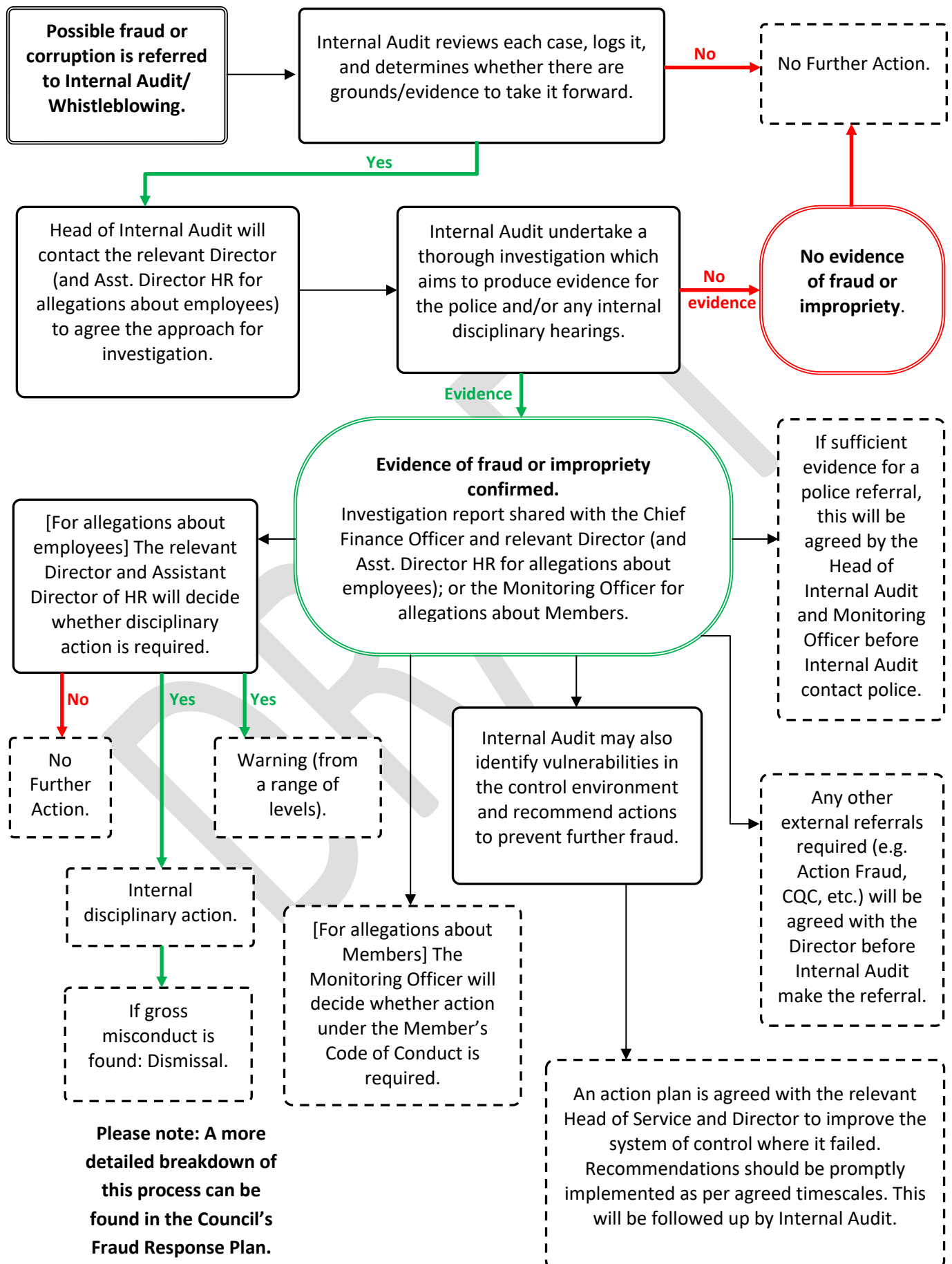
4. How will my concerns be dealt with?

- 4.1 The Fraud Investigation Flowchart at Section 4.4 below sets out how allegations of theft, fraud and corruption will be dealt with once a concern is raised. A more detailed breakdown of the process can be found in the Council's Fraud Response Plan. This is maintained by Internal Audit.

- 4.2 Investigations may be carried out solely by Internal Audit, or by management with support and guidance from Audit. In some instances, if a concern about theft, fraud or corruption is closely linked to other allegations (such as safeguarding or Respect At Work concerns) it may be agreed on a case-by-case basis that another service, such as HR, will take the lead on the investigation with Internal Audit supporting and contributing to the process. Suspicions of fraud, corruption or bribery relating to elected Members will be referred for investigation under the Member's Code of Conduct.
- 4.3 Concerns raised in good faith that turn out to be unfounded or cannot be proved will never result in any negative consequences for those who reported them. However, unfounded allegations made by Council officers for malicious purposes may be referred to HR. Malicious allegations may constitute misconduct and have potential disciplinary consequences.

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4.4 High-Level Fraud Investigation Flowchart



5. How does the Council prevent fraud and corruption from occurring?

5.1. Zero-tolerance for fraud and corruption:

5.1.1 Cambridgeshire County Council is committed to taking a zero-tolerance stand against theft, fraud, bribery and corruption. The Council commits to the following key principles in responding to fraud and corruption:

- Police referral wherever appropriate.
- Prosecution, including prosecution through civil and criminal courts in the Council's name or through the police.
- Seeking full recovery of stolen or fraudulently-obtained public funds by all legal means.
- Disciplinary action and termination of employment where employees are proven to have defrauded or to have attempted to defraud the Council. This includes where employees are complicit with another person's attempts to defraud the Council., or any involvement in bribery or corruption.
- Referring concerns about fraud, corruption, theft or bribery relating to an elected Member for investigation in line with the Member's Code of Conduct.
- Taking action against Members or employees shown to be involved in fraud, theft or corruption under the relevant Code of Conduct, even if the incident does not involve the Council or its finances.
- Termination of contracts with partners and contractors.
- Referring the case to other external agencies, partners or licensing bodies.
- Settlements between the Council and employees/contractors may be deemed necessary as a way of dealing with a case of alleged fraud or corruption. This will only be undertaken following agreement by the Chief Executive and Monitoring Officer and following an independent review by Counsel.

5.2 How the Council tries to prevent fraud and corruption:

5.2.1 The Council seeks to maintain a culture of high ethical standards, probity and openness. The authority's culture supports its zero-tolerance stance on theft, fraud, bribery and corruption. The Council seeks to engage all staff, members, contractors and members of the public to raise concerns about fraud and corruption, in the knowledge that such concerns will be dealt with appropriately.

5.2.2 Internal control measures are embedded throughout all the Council's procedures and systems which aim to prevent or detect theft, fraud and corruption. The Council's computer systems enforce many of these controls. This means staff cannot bypass controls, especially in relation to high-risk functions such as treasury management and payment of funds. Examples of the key internal controls within the Council include:

- Internal policies and procedures (including this Anti-Fraud & Corruption Policy, the Whistleblowing Policy, the authority's Financial Procedures and Contract Procedure Rules, the Anti-Money Laundering Policy, and Officer/Member Codes of Conduct).
- Declarations of Interest, Gifts & Hospitality and Related Parties processes. These require members and staff to declare their outside interests.
- Separation of duties and access controls in financial functions.
- Clear roles and responsibilities for all staff, Members, partners and contractors in preventing and detecting fraud, bribery and corruption (see Appendix 1).
- The role of the Audit & Accounts Committee. The Committee has oversight of the Council's governance arrangements and control systems to prevent and detect fraud.
- External audit of the Council's financial statements.
- Anti-Fraud and Corruption e-learning is available to all Council staff.
- Regular awareness-raising exercises about the risk of fraud and corruption, led by Internal Audit.

5.2.3 Internal Audit conduct regular reviews across the Council's system of internal control. These aim to highlight weaknesses in the control environment and identify any instances where the system of internal control has been breached. If an audit investigation concludes that fraud or corruption has occurred, the Council will identify the vulnerabilities in the system of internal control which allowed the misconduct to occur and rectify them.

6 How is this policy reviewed and monitored?

6.1 CCC Internal Audit is responsible for oversight and maintenance of this Anti-Fraud and Corruption Policy. The Strategy and Resources Committee is the body responsible for approving any changes made to the policy, while the Audit and Accounts Committee is responsible for monitoring the policy.

6.2 Outcomes of individual cases of alleged theft, fraud, corruption or bribery are reported to the Audit & Accounts Committee on an ongoing basis as part of the Internal Audit

Progress Reports. An annual overview of all cases and their outcomes is also provided to Committee in the Annual Whistleblowing Report.

- 6.3 Internal Audit will review and update this policy at least every three years to ensure it remains up to date. More frequent updates will be undertaken if required by a change in legislation or the risk environment. Outcomes of reviews will be reported to the Audit and Accounts Committee.

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Appendix 1

Roles and Responsibilities for Countering Fraud

1. All employees (including maintained school staff):

- 1.1 All employees are responsible for complying with this policy, the Authority's Constitution and Financial Regulations, the Anti-Money Laundering Policy and other Codes of Conduct and policies pertaining to their job role. These include guidance on personal conduct, declaring any possible conflicts of interest, and receiving gifts or hospitality. In addition, all employees must follow instructions given to them by management, particularly surrounding the safekeeping of Council assets.
- 1.2 All employees must ensure that they avoid situations where there is a potential for a conflict of interest, and disclose any possible conflicts of interest via the procedure set out in the Code of Conduct.
- 1.3 Employees should always be vigilant to the possibility of fraud, theft or corruption occurring in their workplace and be able to share their concerns with management. Employees may raise concerns with their line manager, who should report concerns on to Internal Audit, or they can raise concerns directly with Internal Audit at Internal.Audit@Cambridgeshire.gov.uk. Employees can also raise concerns via the Whistleblowing Service, which can be used to make reports anonymously.

2. Elected Members:

- 2.1 As elected representatives, all members of the authority have a duty to protect the Council from all forms of abuse, including fraud and financial impropriety. Members must comply with core Council policies which seek to prevent fraud and corruption, including the Code of Conduct for Members, the Council's Financial Regulations, Constitution, and the relevant legislation.
- 2.2 In addition, Members must lead by example in demonstrating the highest standards of probity and conduct to champion the culture of zero tolerance on fraud throughout Cambridgeshire County Council. Conduct and ethical matters are specifically brought to the attention of members during induction and include the declaration and registration of pecuniary and non-pecuniary interests, declaring the potential for a conflict of interest, and recording the receipt of all gifts and hospitality. The Monitoring Officer advises members of new legislative or procedural requirements.

3. Audit and Accounts Committee:

- 3.1 The Audit and Accounts Committee and its members have specific responsibility regarding the oversight of the Council's governance arrangements and the adequacy of control systems to prevent and detect fraud. The Audit and Accounts Committee receives periodic reports from Internal Audit on suspected and proven incidents of theft, fraud and corruption.

4. CLT and Directors:

- 4.1 CLT and Directors must lead by example in demonstrating the highest standards of probity and conduct to champion the culture of zero tolerance on fraud throughout Cambridgeshire County Council. They are expected to strive to create an environment in which their staff feel able to approach them with any concerns they may have about suspected irregularities.
- 4.2 CLT and Directors are responsible for the communication and implementation of this policy in their work area, ensuring that their employees are aware of the Financial Regulations and other policies, and that the requirements of each are being met in their everyday business activities. They are also responsible for ensuring that the Council's expectations around the ethical conduct of contractors, partners and anyone else acting on behalf of the Council is communicated and the conduct of contractors and partners is monitored.
- 4.3 CLT and Directors also have the responsibility for ensuring that effective systems of control are in place corporately and within their directorate to prevent and detect fraud, and that those systems operate properly. CLT and Directors submit an annual self-assessment of these processes, to be included in the Council's Annual Governance Statement.

5. Heads of Service/Managers/Headteachers:

- 5.1 All managers (including Heads of Service and Headteachers) are responsible for the communication and implementation of this policy in their work area, ensuring that their employees are aware of the Financial Regulations and other policies, and that the requirements of each are being met in their everyday business activities. Managers must lead by example in demonstrating the highest standards of probity and conduct to champion the culture of zero tolerance on fraud throughout Cambridgeshire County Council. They are expected to strive to create an

environment in which their staff feel able to approach them with any concerns they may have about suspected irregularities.

- 5.2 A key preventative measure against fraud and corruption relies on managers taking effective steps during recruitment processes to establish, as far as possible, the honesty and integrity of all employees. Managers must comply with the Authority's formal recruitment procedures during this process. After employment, managers are responsible for ensuring that relevant training is provided and special arrangements implemented when necessary, where staff are dealing with cash or financial systems that generate payments. Checks must be carried out at least annually to ensure that proper procedures are being followed, in order to inform the directorate annual self-assessment.
- 5.3 Similarly, managers must ensure that any contractors, partners or other organisations or individuals acting on behalf of the Council commit to the Council's requirement to act with honesty and integrity at all times. Managers must ensure that contractors, partners and anyone else working on behalf of the Council do not give or offer any inducement, advantage or bribe to any other individual or organisation with the intention of using this to obtain or retain business, or to obtain or retain an advantage in the conduct of business. This applies whether the intention is to obtain or retain business/advantage for themselves, or on behalf of the Council.
- 5.4 Managers must report any suspicions of possible fraud or corruption to Internal Audit at internal.audit@cambridgeshire.gov.uk. No action should be taken which may alert those suspected of involvement. The handling of evidence at the early stages of an investigation can be critical to the outcome, so managers should seek advice from Internal Audit before trying to investigate any allegations.

6. Internal Audit and Risk Management:

- 6.1 The Head of Internal Audit (in consultation with the Assistant Director of HR) shall determine whether a concern or suspicion regarding fraud requires investigation by Internal Audit as opposed to management or HR. This is undertaken as part of the Internal Audit Fraud Referral Assessment process. In all cases where employees are involved, Audit will work with HR and appropriate senior management to ensure that correct procedures are followed and that this policy and the Council's Fraud Response Plan are adhered to.
- 6.2 Internal Audit shall ensure all cases of suspected irregularity are investigated in accordance with the requirements of the Police and Criminal Evidence Act 1984,

Human Rights Act 1998, Fraud Act 2006, Bribery Act 2010 and other relevant legislation. Internal Audit also plays a vital preventative role in ensuring that effective systems and procedures are in place to prevent and detect fraud and corruption. Internal Audit liaise with management to recommend changes in procedures to prevent losses to the Authority.

- 6.3 Internal Audit shall report to CLT and the Audit and Accounts Committee regarding the application of the zero-tolerance statement within this policy. Additionally, Internal Audit maintains records of all reported cases of suspected theft, fraud, corruption or irregularity and report on these as required by the Transparency Code, central government and external audit.

7. External Audit:

- 7.1 Independent external audit is an essential safeguard in the stewardship of public money. This role is delivered through carrying out specific reviews that are designed to test (amongst other things) the adequacy of the authority's financial systems, and arrangements for preventing and detecting fraud and corruption. It is not the external auditor's function to prevent fraud and irregularity, but the integrity of public funds is always a matter of general concern. External auditors are always alert to the possibility of fraud and irregularity, and will act without undue delay if grounds for suspicion come to their notice.

8. Contractors and Partners:

- 8.1 Contractors and partners are expected to create an environment in which their staff feel able to approach them (or the Council directly) with any concerns they may have about suspected irregularities including fraud and corruption or other whistleblowing concerns. Where they are unsure of the procedures, they should refer to the relevant Director for that area, or may approach the Head of Internal Audit & Risk Management directly on any Whistleblowing issue.
- 8.2 Contractors, partners and anyone else working on behalf of the Council must operate to the same standards of ethical conduct expected from Council staff. Contractors, partners and anyone else working on behalf of the Council must not give or offer any inducement, advantage or bribe to any other individual or organisation with the intention of using this to obtain or retain business, or to obtain or retain an advantage in the conduct of business. This applies whether the intention is to obtain or retain business/advantage for themselves, or on behalf of the Council.

9. External Bodies:

- 9.1 Internal Audit has arranged, and will keep under review, procedures and arrangements to develop and encourage the exchange of information on national and local fraud and corruption activity, in relation to Local Authorities with external agencies such as: police, county, unitary and district council groups, the external audit service, Department of Work and Pensions and other government departments.

10. Stakeholders and Customers:

- 10.1 Whilst this policy is primarily aimed at implementing an anti-fraud culture and processes within the Council, its stakeholders and customers may become aware of issues that they feel may indicate fraud or corruption. All stakeholders and customers can report any concerns about theft, fraud or irregularity involving the Council via the Whistleblowing Policy or via whistleblowing@cambridgeshire.gov.uk.

Appendix 2

Legal Definitions of Relevant Offences

This appendix seeks to provide a summary of the main criminal offences relating to fraud, theft, bribery and/or corruption which are likely to be relevant to a public authority such as Cambridgeshire County Council.

1. Fraud:

1.0.1 The Fraud Act 2006 introduced one general offence of fraud, which could be committed in three ways, as set out below:

- Fraud by false representation
- Fraud by failing to disclose information
- Fraud by abuse of position

1.1 Fraud by false representation:

1.1.1 A person commits fraud by false representation if they dishonestly make a false representation and intend in doing so to make a gain for themselves, cause loss to another, or expose another to a risk of loss.

1.1.2 Representations may be express or implied. A representation is false if it is either untrue or misleading, and the person making the representation knows it might be untrue or misleading. Under the Fraud Act 2006, a representation may be regarded as made if it (or anything implying it) is submitted in any form to any system or device designed to receive, convey or respond to communications (with or without human intervention).

1.2 Fraud by failing to disclose information:

1.2.1 A person commits fraud by failing to disclose information if they dishonestly fail to disclose information which they are under a legal duty to disclose, and intend in doing so to make a gain for themselves, cause a loss to another, or expose another to a risk of loss.

1.3 Fraud by abuse of position:

1.3.1 A person commits fraud by abuse of position if they occupy a position in which they are expected to safeguard, or not to act against, the financial interests of another person; they dishonestly abuse that position, and intend in abusing that position to make a gain for themselves, cause a loss to another, or expose another to a risk of

loss. A person can be regarded as having abused their position where their conduct consisted of an omission rather than an act.

2. Theft:

- 2.1 The Theft Act 1968 outlines that a person is guilty of theft if they dishonestly appropriate property belonging to another, with the intention of permanently depriving the other of it.

3. Bribery:

- 3.0.1 The Bribery Act 2010 provides offences for bribing another person and offences relating to being bribed:

3.1 Offences of bribing another person:

- 3.1.1 A person is guilty of an offence if they offer, promise, or give a financial or other type of advantage to another person, and:

- The person providing the advantage intends it to either induce or reward any person for the improper performance of a relevant function or activity; or
- The person providing the advantage knows or believes that the acceptance of the advantage would itself constitute the improper performance of a relevant function or activity.

3.2 Offences relating to being bribed:

- 3.2.1 A person is guilty of an offence if they request, agree to receive or accept a financial or other type of advantage, and:

- The person on the receiving end of the advantage intends that, in consequence, a relevant function or activity should be performed improperly (whether by them or another person); or
- The request, agreement or acceptance itself constitutes the improper performance of a relevant function or activity.

- 3.2.2 Similarly, an offence is committed if a person requests, agrees to receive or accepts a financial or other type of advantage as a reward for the improper performance of a relevant function or activity, or if a relevant function or activity is performed improperly by anybody in anticipation of a person requesting, agreeing to receive or accepting a financial or other type of advantage.

3.3 Offences relating to failure to prevent bribery:

- 3.3.1 The Bribery Act created the offence, under Section 7, which can be committed by commercial organisations failing to prevent persons associated with them from bribing another person on their behalf. Note that it is not an offence for an organisation to fail to prevent persons associated with them from receiving bribes.
- 3.3.2 The definition of a commercial organisation may include public organisations involved solely or jointly in commercial activities. In 2015, CIPFA and the NCA issued an alert stating that “a local authority may be liable to prosecution under Section 7 of the Act if a person ‘associated’ with it bribes another person, intending to obtain or retain business or a business advantage for the local authority. An ‘associated’ person may be an employee, agent or subsidiary of the local authority”. (Local Authorities and the UK Bribery Act, National Crime Agency Amber Alert Reference A0186-ECC.)
- 3.3.3 This broad scope means that contractors could be seen as associated persons if they are performing services for, or on behalf of, a local authority. A supplier may also be an associated person if they are performing services for a local authority rather than simply acting as a seller of goods. See Appendix 3 for a summary of how the Council demonstrates that it has adequate procedures in place to prevent bribery taking place.

4. Corruption:

- 4.1 Corruption is the abuse of entrusted power for private gain. The UK Government’s 2017-2022 Anti-Corruption Strategy states that corruption involves “the abuse of office and position to benefit a third party (an individual, business or other organisation), in return for payment or other reward”. Offences in the UK relating to corruption are contained across multiple pieces of legislation, including but not limited to the Fraud Act 2006 and the Bribery Act 2010.

5. Money Laundering and Terrorist Financing:

- 5.1 See Cambridgeshire County Council’s Anti-Money Laundering Policy, Appendix 1 for details of these offences.

Appendix 3

The Six Principles of Anti-Bribery

Secretary of State guidance around the Bribery Act 2010 advises that organisations wishing to prevent bribery being committed on their behalf should build their anti-bribery procedures based on six principles. These are listed below, along with high-level summaries of how Cambridgeshire County Council ensures that it has met the requirements of each principle.

Please note that while the guidance refers to ‘commercial organisations’, CIPFA and NCA guidance confirms that in this context the definition of a commercial organisation may include public organisations involved solely or jointly in commercial activities.

- 1) Proportionate procedures** – *An organisation’s procedures to prevent bribery by persons associated with it are proportionate to the bribery risks it faces and to the nature, scale and complexity of the commercial organisation’s activities. They are also clear, practical, accessible, effectively implemented and enforced.*

This Anti-Fraud and Corruption Policy sets out Cambridgeshire County Council’s corporate anti-fraud policy framework, which seeks to prevent bribery along with other forms of corruption and fraud. The policy framework includes a range of key policies such as the Council’s procedures for gifts and hospitality, declaration of interests, and the Financial Regulations.

- 2) Top-level commitment** – *The top-level management of a commercial organisation (be it a board of directors, the owners or any other equivalent body or person) are committed to preventing bribery by persons associated with it.*

Cambridgeshire County Council’s Anti-Fraud and Corruption Policy sets out this commitment of zero tolerance to all forms of fraud, bribery and corruption.

- 3) Risk assessment** – *The commercial organisation assesses the nature and extent of its exposure to potential external and internal risks of bribery on its behalf by persons associated with it. The assessment is periodic, informed and documented.*

Cambridgeshire County Council conducts regular reviews of its exposure to the risk of internal and external bribery, fraud, corruption and theft, and the risk of money laundering, as part of its ongoing risk management process.

- 4) Due diligence** – *The commercial organisation applies due diligence procedures, taking a proportionate and risk based approach, in respect of persons who perform or will perform services for or on behalf of the organisation, in order to mitigate identified bribery risks.*

Cambridgeshire County Council's corporate due diligence procedure is set out in Section 6 of its Anti Money Laundering Policy.

- 5) Communication (including training)** – *The commercial organisation seeks to ensure that its bribery prevention policies and procedures are embedded and understood throughout the organisation through internal and external communication, including training, that is proportionate to the risks it faces.*

Cambridgeshire County Council's Anti-Fraud and Corruption Policy, Anti-Money Laundering Policy and Whistleblowing Policy are available to staff on the Council's intranet, and periodic awareness-raising campaigns are conducted by the Internal Audit and Risk Management team. The Council's Fraud Prevention e-learning module is also available to all staff and includes training on identifying and responding to bribery and corruption, fraud and money laundering.

- 6) Monitoring and review** – *The commercial organisation monitors and reviews procedures designed to prevent bribery by persons associated with it and makes improvements where necessary.*

The Council's Anti-Fraud and Corruption policy and associated policies and procedures are owned by the Internal Audit service. These policies will be reviewed and updated at least every three years by Internal Audit, or more frequently if required.