

# Knowsley Town Council



# Anti-Fraud and Corruption Policy

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Applies to: Councillors, Staff, Contractors & Volunteers

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# Knowsley Town Council

## Anti-Fraud and Corruption Policy

### 1. Policy Statement

Knowsley Town Council is committed to the highest standards of honesty, integrity and transparency. We will not tolerate fraud or corruption in any form and will take robust action against anyone who attempts to abuse public funds or council resources.

This policy sets out the council's approach to preventing, detecting, and responding to fraud and corruption, whether attempted from within or outside the organisation.

### 2. Scope

This policy applies to:

- Members (Councillors)
- Council employees (including contractors and temporary staff)
- Volunteers
- Any third parties acting on behalf of the Council

It covers:

- Theft
- Bribery
- Corruption
- Forgery
- Misuse of assets
- False accounting
- Deception (e.g. false claims or invoices)

### 3. Our Anti-Fraud Objectives

We aim to:

- Promote a culture of **zero tolerance** to fraud and corruption
- Maintain robust **internal controls** to prevent and detect fraud
- Encourage **whistleblowing and reporting** of concerns
- Investigate suspicions **promptly, fairly and consistently**
- Take appropriate **disciplinary, civil or legal action**

### 4. Roles and Responsibilities

Role	Responsibility
Council	Oversees financial controls and governance; adopts policy
Clerk/RFO	Implements internal controls, reports irregularities, maintains proper records
Members & Staff	Must act with integrity, report suspicions, follow Financial Regulations

Role	Responsibility
Internal Auditor	Reviews effectiveness of controls and advises on improvements

## 5. Preventing Fraud and Corruption

Fraud prevention is embedded in the Council's:

- **Financial Regulations**
- **Procurement procedures**
- **Segregation of duties**
- **Bank reconciliation and budget monitoring**
- **Asset management and payroll controls**

Training and awareness are provided to staff and members where appropriate.

## 6. Reporting and Whistleblowing

Anyone who suspects fraud, corruption, or wrongdoing must report it immediately to:

**Town Clerk & RFO** - [jane.thomas@knowsleytowncouncil.gov.uk](mailto:jane.thomas@knowsleytowncouncil.gov.uk)

If the concern involves the Clerk, it should be reported to the **Mayor or Chair of the Council**.

Whistleblowers will be **protected from victimisation or reprisal**, in accordance with the Public Interest Disclosure Act 1998.

Anonymous reports will be considered, but action may be limited if evidence is lacking.

## 7. Investigation and Response

- Allegations will be assessed by the Clerk and/or Mayor and, if appropriate, referred to the **Internal Auditor, Monitoring Officer, or Police**.
- Investigations will be **confidential, impartial, and evidence based**.
- Where fraud is proven, the Council will take action which may include:
  - Disciplinary procedures
  - Civil recovery of funds
  - Police referral
  - Reporting to external auditors and insurers

## 8. Monitoring and Review

- The Clerk will maintain a fraud incident log (even if nil returns).
- The policy will be reviewed **annually** as part of the Council's risk management process.
- Outcomes will be reported in confidence to the Council where appropriate.

## 9. Related Documents

- Financial Regulations
- Code of Conduct for Members

- Employee Disciplinary Policy
- Risk Management Policy
- Whistleblowing Policy
- Practitioners' Guide 2025 (Assertion 2)