



LONDON BOROUGH OF HACKNEY

ANTI-FRAUD AND CORRUPTION POLICY

Dated
1 June 2019

Anti-Fraud and Corruption Policy

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Anti-Fraud and Corruption Policy

1. Introduction

- 1.1 The London Borough of Hackney employs over 4000 staff and has gross expenditure in the region of £1 billion. As with all large organisations, the size and nature of our services puts us at risk of loss due to fraud, corruption and irregularity both from within and outside the Council.¹
- 1.2 The Council is committed to tackling fraud, corruption and irregularity and making sure that the opportunity for these to occur is reduced to the lowest possible level. Where there is the possibility of fraud, corruption or other irregularities, we will deal with such matters as outlined in the following paragraphs.
- 1.3 The Council has increased its' anti-fraud capabilities in recent years and this has led to an increase in the detection of and response to fraud and corruption wherever it may occur, and the introduction of dedicated teams to tackle the highest priority issues. As a result Hackney has achieved significant savings and recovery of funds and assets which contributed to the Council's improved rating and reputation for sound internal control.
- 1.4 An important part of this approach is an established anti-fraud and corruption policy, which we use to advise and guide Members, staff and persons working for/with the Council on our approach to the serious issues of fraud and corruption. This document provides an overview of our approach in this matter and includes a 'Fraud Response Plan' which provides more detailed guidance on how to deal with fraud and corruption (see Appendix 1).
- 1.5 The main message is that we expect all Members, employees and workers to be fair and honest, and to give us all reasonable help, information and support needed to deal with fraud and corruption. Employees in this context relates to direct employees as well as other 'workers', including agency, contract staff, consultants, volunteers, etc.
- 1.6 This Anti-Fraud & Corruption Policy and supporting documents apply to the whole of the Council, including Hackney Learning Trust and schools maintained by the London Borough of Hackney.
- 1.7 The policy set out in this document covers the following areas:
- Approach
 - Culture
 - Our written rules
 - Expected behaviour
 - Preventing fraud and corruption
 - Whistle-blowing
 - Detecting and investigating fraud and corruption
 - Suspicions of Money Laundering
 - Fraud Awareness & Training

¹ For the purposes of this document 'fraud & corruption' is an all encompassing term which should also be taken to include, dishonest financial irregularity/misappropriation, theft, etc.

- 1.8 This policy supersedes all previously published Anti-Fraud and Corruption Strategies and will take immediate effect. We will continue to review our rules and procedures and it is the responsibility of the Audit and Anti-Fraud Service to make sure that this document is reviewed regularly to ensure it remains effective. Any enquiries about this policy should be directed to the Corporate Head of Audit, Anti-Fraud and Risk Management. Future revisions to this policy should be approved by the Council's Audit Committee.

2. Approach

- 2.1 The Council's approach to minimising the risk of loss due to fraud, corruption and irregularity is: -
- a) to develop and maintain a culture of honesty, openness and opposition to these acts within the organisation and in its relationship with outside individuals and organisations, and
 - b) to have a series of comprehensive and inter-related procedures and arrangements in place designed to prevent, frustrate and deter fraud, corruption and irregularity or, where they occur, to detect and take effective action against any attempted or actual fraud, corruption or irregularity affecting the Council.
- 2.2 We will investigate cases of fraud and corruption. Employees are expected to comply with the spirit as well as the letter of the laws and regulations that are relevant to their Council duties. Those who commit fraudulent and corrupt actions are liable to face disciplinary action which may result in dismissal for gross misconduct. We may also refer such matters to the police and will support criminal prosecutions where this is appropriate.

This approach is outlined in more detail below.

3. Culture

- 3.1 The Council believes that the maintenance of a culture of honesty and openness is an important component in tackling fraud, corruption and irregularity.
- 3.2 To be effective, the Anti-Fraud and Corruption Policy and supporting arrangements set out in Section 4, need to apply within an overall culture within the Council which positively promotes the highest standards expected of those who represent it and makes it absolutely clear that the Council will not tolerate dishonesty on the part of any of its Members or employees or any persons/organisations involved in any way with the Council.
- 3.3 To encourage this culture the Council has adopted a range of interrelated policies, codes, arrangements and procedures which ensures all Members, employees or any persons/organisations involved in any way with the Council are fully aware of, and in agreement with, the culture the Council seeks to maintain, the values and conduct expected of persons working for or involved with the Council, including the Council's aim of keeping fraud & corruption to the lowest possible level.

3.4 Responsibility for the creation of an anti-fraud culture rests jointly with all those involved in the Council in providing political direction, determining policy, and providing management and supervision. The Council expects that Members and its employees at all levels will actively promote an anti-fraud and corruption culture through:

- endorsing and publicising the Council's Anti-Fraud and Corruption Policy,
- being an example to others by ensuring adherence to legal requirements and the Council's internal rules and regulations, (e.g. Codes of Conduct, Financial Procedure Rules, Contract Standing Orders, Using Systems & Data Policy, etc.)
- organising effective induction and training which should include briefings regarding expected standards of conduct, and references to anti-fraud and corruption arrangements
- encouraging the reporting of any suspicions of fraud, corruption or deliberate irregularity by Members, employees, the public or any other third party with whom the Council works in providing services
- treating seriously any suspicions reported to them and dealing sensitively with the person reporting the information
- dealing swiftly and robustly with those who defraud the Council or who act corruptly
- raising any concerns they may have regarding fraudulent or corrupt activity and maintaining effective internal control arrangements designed to combat fraud, corruption and irregularity.

3.5 The Council believes that the maintenance of a culture of honesty and openness is an important component in tackling fraud, corruption and irregularity.

4. Our Written Rules

4.1 The Council has in place a number of rules, code of conducts and policies to ensure that financial, operational and organisational procedures are properly controlled. These are an important part of our internal control process, and it is important that all Members, employees and workers know about them.

4.2 The most important of these are as follows: -

- Constitution
- Financial Procedure Rules
- Contract Standing Orders
- Code of Conduct for Council Employees
- Code of Conduct for Members
- Gifts & Hospitality Procedure
- Anti-Fraud & Corruption Policy
- Anti-Money Laundering Policy
- Anti-Bribery Policy
- Whistleblowing Policy
- Using Systems and Data Policy
- Information Sharing Policy
- Records Management Policy

➤ Scheme for Financing Schools and Schools Financial Procedures Manual

- 4.3 Individual departments have also introduced their own measures, which are designed to control their activities. Examples include schemes of delegation, accounting control procedures and procedural/operational manuals.
- 4.4 Managers in the individual departments must ensure that all employees and other workers have access to these procedures/manuals and receive suitable training.
- 4.5 Members, employees and workers must make sure that they read and understand the rules, code of conducts and policies that apply to them, and act in line with them.
- 4.6 Any Member, employee or worker who does not adhere to the rules, codes of conduct or policies may be subject to formal action, including disciplinary or legal action.

5. Expected Behaviour

- 5.1 All people and organisations that are in any way associated with Hackney Council are expected to be honest and fair in their dealings not only with us, our clients and customers but also in their dealings outside of the Council.
- 5.2 We expect our Members and employees to lead by example in these matters.
- 5.3 The Code of Conduct for Council Employees forms part of the contract of employment, and it requires that employees and workers must always work in accordance with the Anti-Fraud and Corruption Policy.
- 5.4 Our employees have an important part to play in combating fraud and corruption and are expected to warn us and provide information if they suspect a case of fraud or corruption. Guidance on reporting such matters is available in the Council's Fraud Response Plan attached as Appendix 1.
- 5.5 We will deal with all referrals fairly and confidentially and as far as possible we will not reveal the names of the people who reported the matter to us. However, confidentiality cannot be guaranteed, e.g. if an investigation leads to a prosecution and the person who reported the matter is required to give evidence in court. Section 6 below and the Council's Fraud Response Plan attached at Appendix 1 gives more advice on this issue for both managers and staff. Our Anti Bribery Policy (Appendix 2) sets out our approach to minimising the risk of corruption and bribery.
- 5.6 The Nolan Committee sets out the seven guiding principles that apply to people who serve the public. The Council has developed its working culture with these principles in mind. (Appendix 3)
- 5.7 Managers are expected to deal fairly and quickly with anyone who has or is suspected of committing fraud or acting corruptly. We may refer such matters to the police if we reasonably believe that a criminal offence has taken place.

6. Preventing Fraud and Corruption

- 6.1 We believe that if we are to beat fraud and corruption, we must prevent it from happening in the first place. It is essential that we have clear rules and procedures, within which Members, employees, consultants and contractors can work. These include the main rules, codes of conduct and policies set out in Section 4.2 above.
- 6.2 We will regularly review and update our written rules.
- 6.3 Managers are responsible for ensuring that suitable levels of internal check are included in working procedures, particularly financial procedures. It is important that duties are organised so that no one person can carry out a complete transaction without some form of checking process being built into the system.
- 6.4 Managers, in consultation with Human Resources, are responsible for ensuring that pre-employment screening checks appropriate to the nature of the post are carried out. These should include checks on identity, previous employment and permission to work in the UK, and may also include checks on qualifications, credit status and Disclosure & Barring Service checks. This applies to both permanent and temporary staff.
- 6.5 The Council is committed to working and co-operating with other organisations to prevent organised fraud and corruption. Wherever possible, we will be prepared to help and exchange information with other councils and organisations to deal with fraud subject to any legal restrictions and the Council's own policies/procedures regarding the exchange of information.
- 6.6 The exchange of personal information will be properly controlled in line with appropriate legislation. The Audit & Anti-Fraud Service will adhere to and only exchange personal information in accordance with the Council's Information Sharing Policy and the Data Protection Act (DPA).
- 6.7 Confidential facilities are available for people to report fraud or corruption or give us information that may prevent the same. These include telephone hotlines, which members of the public as well as staff can use to give us information about specific services.

7. Whistleblowing

- 7.1 This section should be read in conjunction with the Council's Whistleblowing Policy available on the intranet.
- 7.2 Although employees are expected to report their concerns, we recognise that this can be a difficult decision to make. If you report a concern in good faith you will have nothing to fear because you will be doing a service to the public and to the Council.
- 7.3 The Council will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern

in good faith. Any investigation into allegations that you raise of potential malpractice or wrong doing will not influence or be influenced by any disciplinary, capability, redeployment or redundancy procedures that might separately apply to you.

- 7.4 We will maintain an independent 'Whistleblowers' Hotline for staff provided by Expolink that you can use if you feel unable to follow the standard reporting process set out at section 3.3 of the Fraud response Plan. To report a concern via the Whistleblowing Hotline please call **0800 374199**. Details of this number are also available from the Whistleblowing page on the Council's Intranet.
- 7.5 Concerns that are expressed anonymously will be considered, however, in our experience there is a greater likelihood of a successful investigation if we are able to communicate directly with those who raise a concern.
- 7.6 Factors taken into account when deciding on appropriate investigation action would include: -
- The nature and seriousness of the issue raised
 - The credibility of the concern
 - The likelihood of confirming the allegation from attributable sources
- 7.7 If you make an allegation or raise a suspicion in good faith, but it is not confirmed by the investigations, no action will be taken against you. However, if during the investigation it is found that you made an allegation/raised a suspicion frivolously, maliciously or for personal gain, disciplinary action may be taken against you.
- 7.8 Different types of concern can be raised through the whistleblowing arrangements. A list of relevant contacts for fraud and corruption concerns is attached as Section 9 of the Fraud Response Plan at Appendix 1.

8. Detecting and investigating fraud and corruption

- 8.1 Our approach to detecting and investigating fraud and corruption is set out in the Council's Fraud Response Plan attached at Appendix 1. This also sets out the responsibilities upon all workers to report their concerns, and what actions should be taken by workers, managers and investigators.
- 8.2 We will take all steps available to us to recover any monies misappropriated from the Council.
- 8.3 We will communicate the outcomes of our investigations where appropriate (e.g. via internal bulletins and the press).
- 8.4 The External Auditor also has powers to investigate fraud and corruption.

9. Suspicions of Money Laundering

- 9.1 This section should be read in conjunction with the Council's Anti-Money Laundering Policy.

- 9.2 Money laundering is essentially the process by which the proceeds of crime and the true ownership of those proceeds are changed so that they appear to come from a legitimate source.
- 9.3 All employees have a clear obligation under the Terrorism Act 2000, the Proceeds of Crime Act 2002 (POCA) and the Money Laundering Regulations 2007 to report suspicions of money laundering and there can be severe penalties for individuals who fail to act in accordance with the legislation.
- 9.4 Employees must report any suspicions of money laundering to the Money Laundering Reporting Officer (MLRO) or Deputy Money Laundering Reporting Officer (DMLRO) (contact details at Appendix 1). Reporting suspicions in this way is essential to ensure that: -
- Suspected instances of money laundering are investigated properly
 - There is a standard process for dealing with suspected cases of money laundering
 - Individual's and the Council's interests are protected.
- 9.5 The MLRO or DMLRO will ensure that legislative requirements for investigating and reporting suspicions of money laundering are followed.
- 9.6 It is essential that employees do not do anything that could result in the suspect being alerted (known as 'tipping off') to the fact there is a suspicion regarding their activity or that the matter has been reported.

10. Fraud Awareness & Training

- 10.1 We recognise that the key to the continuing success of our anti-fraud culture depends upon maintaining a high level of fraud awareness among employees, workers and those who work with us.
- 10.2 We support the principle of providing training for our employees who are involved in, or managing, internal control systems, to ensure that their responsibilities and duties are regularly reviewed and reinforced.
- 10.3 We will seek to ensure our stance on fraud and corruption is widely publicised both internally and externally to the Council. All Members, employees, workers and other associated bodies/persons with whom the Council conducts its business will be appropriately informed of this policy and the supporting framework as outlined in Section 4 above.
- 10.4 We are also committed to training and developing our staff that are involved in investigating fraud and corruption, and will ensure suitable training is provided.

Fraud Response Plan



1. Introduction

- 1.1 It is important that we do all we can to prevent and detect fraud to make sure that we can provide services to residents and businesses within the Borough of Hackney honestly and efficiently.
- 1.2 Our Anti-Fraud and Corruption Policy sets out the principles we are committed to in relation to preventing, reporting, detecting and managing fraud/corruption and money laundering.
- 1.3 This fraud response plan sets out what employees and managers should do if they suspect fraud, corruption or money laundering.
- 1.4 It is the responsibility of the Audit & Anti-Fraud Service to investigate suspicions of fraud and corruption.

2. Definitions

Fraud:

The Fraud Act 2006 created an offence of fraud which can be committed in three separate ways: -

- (i) by false representation
A fraud will be committed if a person dishonestly makes a false representation and when doing so intends to make a gain or cause loss (or a risk of loss) to another.
- (ii) by failing to disclose information
A fraud will be committed if a person dishonestly fails to disclose information where there is a legal obligation to do so and when doing so intends to make a gain or cause loss (or a risk of loss) to another.
- (iii) by abuse of position
A person will commit fraud if they occupy a position in which they are expected to safeguard, or not act against, the financial interests of another person and they dishonestly abuse that position; and in doing so intend to make a gain or cause loss (or a risk of loss) to another.

Corruption:

The Bribery Act 2011 introduces three principle corruption offences:

- (i) Bribing another person

An individual commits an offence if a financial or other advantage is offered, promised or given to another person for the improper performance of a function;

(ii) Being bribed

An individual commits an offence if a financial or other advantage is requested, agreed or received for the improper performance of a function;

(ii) Failure to prevent bribery

A corporate offence whereby the Council can be liable for the actions of those associated with it if it has not taken reasonable steps to mitigate against this (see the Bribery Act Policy at Appendix 2 for details).

Money Laundering:

Money laundering, as defined in the Proceeds of Crime Act 2002 (POCA), is: -

- (i) Concealing, disguising, converting or transferring criminal property, or removing it from the UK;
- (ii) Entering into or becoming concerned in an arrangement which you know or should reasonably suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person;
- (iii) Acquiring, using or possessing criminal property.

3. Procedures for Reporting Suspected Fraud and Corruption

- 3.1 We rely on our staff to help us to prevent and detect fraud and corruption or suspicions of money laundering. It is often members of staff who are in a position to spot any possible cases of fraud, corruption or money laundering at an early stage.
- 3.2 We require staff to tell us if they suspect fraud, corruption or money laundering.
- 3.3 We have specific reporting lines for fraud and corruption. You should first report the matter to your line manager. If this is not appropriate, you should inform the Corporate Head of Audit, Anti-Fraud & Risk Management.
- 3.4 We also subscribe to an independent 'Whistleblowers' telephone hotline, which is run for us by an independent organisation, Expolink. This allows concerns to be raised where the reporting person does not have confidence

in the Council's internal arrangements for any reason. You can phone the whistleblower's hotline if you have information about a suspected case of fraud, corruption, money laundering and/or other irregularity but you do not feel able to follow the normal reporting procedures. You can contact Expolink on **0800 374199**.

- 3.5 The action that you take when you first find out about a suspected case of fraud, corruption, money laundering or irregularity might be vital to the success of any investigation that follows, so it is important that your actions are in line with the information given in this document.

4. Action by Employees

- 4.1 Under our Code of Conduct for Employees and Financial Procedure Rules, employees must report any suspected cases of fraud and corruption to their direct line manager or, if that is not appropriate, to the Corporate Head of Audit, Anti-Fraud and Risk Management. Reporting cases in this way ensures that: -

- Suspected cases of fraud and corruption are investigated properly;
- The Fraud Response Plan is carried out properly;
- There is a standard process for dealing with all suspected cases of fraud, corruption (including bribery) and money laundering;
- There is a corporate process for dealing with surveillance activity; and
- Individuals and the Council's interests are protected.

- 4.2 You should ensure that you are familiar with all of the rules, regulations, policies and procedures that are in place to assist you with your duties. You must not participate in fraudulent or corrupt acts.

- 4.3 If you suspect fraud, corruption or money laundering anywhere within the Council, you should do the following:

- (i) Write down your concerns immediately. Make a note of all relevant details, such as what was said in phone or other conversations, the date, the time and the names of anyone involved.
- (ii) In cases of suspected fraud or corruption, you must report the matter immediately to your line manager, a more senior manager in your chain of command or the Corporate Head of Audit, Anti-Fraud and Risk Management. Give that officer any notes you have made or any evidence you have gathered. Don't tell anyone else about your suspicions.
- (iii) In cases of suspected money laundering, immediately advise the Corporate Head of Audit, Anti-Fraud and Risk Management, who is

the Council's designated Money Laundering Reporting Officer (MLRO), or the Audit Investigation Manager (Deputy Money Laundering Reporting Officer, DMLRO). (See contact details at section 9 of this response plan.)

- (iv) Help Audit & Anti-Fraud or authorised organisations in any investigation.

4.3 Under **no circumstances** should you try to carry out an investigation yourself. This may damage any Audit & Anti-Fraud or subsequent investigation.

5. Action by Managers

5.1 If you find out about suspected fraud, corruption or money laundering in your work area, you should do the following: -

- (i) Listen to the concerns of your staff and treat every report you receive seriously and sensitively. Staff should be encouraged to raise any concerns they have with their manager.
- (ii) Make sure that all staff concerns are given a fair hearing. You should also reassure staff that they will not suffer victimisation because they have told you of their suspicions.
- (iii) Get as much information as possible from the member of staff, including any notes and any evidence they have that may support the allegation. Do not interfere with any evidence and make sure it is kept in a safe place.
- (iii) Assess whether the suspicions are justified before you take the matter further.

5.2 **Do not** try to carry out an investigation yourself. This may damage any Audit & Anti-Fraud or subsequent investigation.

5.3 Report the matter immediately to the Corporate Head of Audit, Anti-Fraud and Risk Management. Do not tell anyone else about your suspicions.

5.4 Help Audit & Anti-Fraud or authorised organisations in any investigation.

6. Audit & Anti-Fraud

6.1 Audit & Anti-Fraud is normally the appropriate unit to investigate cases of suspected fraud or corruption, so it is important that every suspicion is reported to the Corporate Head of Audit, Anti-Fraud and Risk Management.

- 6.2 The Corporate Head of Audit, Anti-Fraud and Risk Management, the Audit Investigation Manager and Investigators will work with managers to decide on the type and course of the investigation. This will include referring cases to the police where necessary. Where appropriate we will press for prosecution of offenders.
- 6.3 If an investigation is likely to result in both a Police investigation and action under the Council's Disciplinary Policy & Procedure, then advice should be sought from the Corporate Head of Audit, Anti-Fraud and Risk Management and the Head of Human Resources & Organisational Development.
- 6.4 We will investigate all referrals received although if anonymous referrals are received they are much harder to pursue so we would encourage anyone with concerns to refer the matter directly to the Corporate Head of Audit, Anti-Fraud and Risk Management if they do not feel they can raise the matter with their manager.
- 6.5 Experienced audit staff will manage fraud and corruption investigations. Any investigation that Audit & Anti-Fraud carries out will be in line with our Divisional procedural guidelines and best practice established by the Criminal Procedures and Investigations Act (CPIA), the Police and Criminal Evidence Act (PACE) and any other relevant legislation.
- 6.6 Should surveillance be considered necessary during the course of an investigation this must be conducted in line with the Regulation of Investigatory Powers Act 2000 (RIPA) and the Council's own corporate RIPA policy. Failure to follow this policy could have severe consequences for the Council and only officers trained in this specialist area of investigations should carry out this activity. The Corporate Head of Audit, Anti-Fraud and Risk Management is responsible for maintaining the Council's central record of RIPA authorisations.
- 6.7 Audit & Anti-Fraud will liaise with managers about the results of any investigation, and advise them what action they need to take.
- 6.8 If appropriate, feedback will also be provided to the person who initially raised the concerns.

7. Responsibilities if you are a worker who is the subject of an Audit & Anti-Fraud investigation

- 7.1 There is a responsibility on all officers of the Council, associated bodies or partner organisations (including organisations that the Council has provided grants to or contracted with) to provide any information, explanation or

document under their control, or access to any premises, facilities or systems which is required in connection with any Audit & Anti-Fraud investigation.

- 7.2 Audit & Anti-Fraud investigations will be carried out in line with Divisional procedures and established best practise, and workers are required to cooperate with these arrangements.
- 7.3 Interviews with investigation subjects will ordinarily be audibly recorded, at the discretion of Audit & Anti-Fraud and in accordance with best practice and team procedures.

8. Actions Arising from Investigation

- 8.1 The Council's Anti-Fraud and Corruption Policy provides that dishonesty on the part of any Members, employees or any person or organisations involved in any way with the delivery of services to or on behalf of the Council will not be tolerated. Where fraud, corruption or irregularity is detected the Council will rigorously pursue appropriate action against the persons concerned including legal and/or disciplinary action, and wherever possible and deemed appropriate, we will take action to recover any losses suffered.

9. Contact Details

Contact	Details
Council	
Corporate Head of Audit, Anti-Fraud and Risk Management (Money Laundering Reporting Officer) Michael Sheffield	Hackney Town Hall, Mare Street, Hackney, E8 1EA Tel: 020 8356 2505 Email: michael.sheffield@hackney.gov.uk
Audit Investigation Manager (Deputy Money Laundering Reporting Officer) Vinny Walsh	Hackney Town Hall, Mare Street, Hackney, E8 1EA Tel: 020 8356 2536 Email: vinny.walsh@hackney.gov.uk
External	
Expolink Whistleblowing Hotline (Council's external hotline)	Tel: 0800 374199

Public Concern at Work	CAN Mezzanine 7-14 Great Dover Street, London, SE1 4YR Tel: 020 7404 6609 Email: whistle@pcaw.co.uk Website: www.pcaw.co.uk
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Anti Bribery Policy

Offences

The following offences were introduced as part of the Bribery Act 2011:

- (iv) **Section 1 - Bribing another person**
An individual commits an offence if a financial or other advantage is offered, promised or given to another person for the improper performance of a function;
- (v) **Section 2 - Being bribed**
An individual commits an offence if a financial or other advantage is requested, agreed or received for the improper performance of a function;
- (vi) **Section 7 - Failure to prevent bribery**
The Council will be liable to prosecution if a person associated with it bribes another person intending to obtain or retain business or an advantage in the conduct of business for the Council. Organisations are liable to an unlimited fine if convicted for this offence.

Council position

The Council has a zero tolerance approach to all forms of fraud and corruption, including bribery. We expect all people working for the Council (permanent and fixed term employees, agency workers and contractors) and other organisations that carry out functions on our behalf to act honestly and with integrity, and comply with the spirit as well as the letter of the laws and regulations that are applicable to their work.

Corporate Responsibilities

The Council can demonstrate a commitment to preventing bribery by following government advice based around six key principles. Adherence to these principles will provide a full organisational defence to any Section 7 offence in the event that a case of bribery does take place. The six principles are as follows:

1. Proportionate procedures
This policy sets out the Council's stance on bribery. Our Financial Procedure Rules, Contract Standing Orders, Code of Conduct, Anti-Fraud and Corruption Policy and Gifts and Hospitality Guidance set out the standards and detailed procedures that workers should follow. These procedures are proportionate with the bribery risks that the Council faces and the nature, scale and complexity of the activities that we undertake.
2. Top level commitment
The Council's senior management are committed to preventing bribery by persons associated with it. Honesty and integrity is one of the seven principles of working at Hackney, this requires that anyone working for the

Council does not place themselves in a position where their honesty and integrity can be questioned, must avoid conflicts of interest, and must make decisions fairly (including the award of contracts and when making appointments).

3. Risk Assessment

The Council is committed to on-going risk assessment of potential external and internal risks, including bribery, financial irregularity and other events that would damage its reputation

4. Due diligence

The Council 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 council, in order to mitigate identified bribery risks.

5. Communication (including training)

The Council seeks to ensure that its bribery prevention policies and procedures are embedded and understood throughout the organisation, and that training will be provided which is proportionate to the Council's risk of exposure to bribery.

6. Monitoring and review

All Council procedures that relate to the prevention of bribery will be monitored and reviewed, and improved where necessary.

Gifts and hospitality

This policy is consistent with the Council's gifts and hospitality procedures. These require that the offer of gifts and hospitality must always be recorded and the offer will ordinarily be refused unless it is of token value. The Gifts and Hospitality procedure sets out the very limited circumstances where an offer may be accepted and the process that has to be followed. The procedure also sets out that even the restricted circumstances that could lead to an offer being accepted will never apply if the entity offering the gift or hospitality is a potential Council supplier or employee, or is seeking planning permission from the Council.

Facilitation payments

These are small bribes paid to facilitate routine government action. Facilitation payments are not acceptable under the Council's Anti-Fraud and Corruption arrangements.

The Seven Principles of Public Life

Selflessness

Holders of Public office should take decisions in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends

Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.

Objectivity

In carrying out public business, including making public appointments, awarding contract, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership

Holders of public office should promote and support these principles by leadership and example.

Note

These principles are a direct extract from the Nolan Committee report