



Treverbyn Parish Council

Anti-Fraud and Corruption Policy

1. Introduction

Treverbyn Parish Council (“the Council”) is committed to maintaining the highest standards of honesty, integrity, accountability, and transparency in all its activities.

The Council has a zero-tolerance approach to fraud, corruption, bribery, theft, financial irregularity, and dishonest conduct.

This policy sets out the Council’s approach to preventing, detecting, and responding to fraud and corruption.

2. Purpose

The purpose of this policy is to:

- Protect public funds and assets
- Promote a culture of honesty and accountability
- Reduce the risk of fraud and corruption
- Ensure concerns are reported appropriately
- Clarify responsibilities of councillors, staff, contractors, and volunteers
- Support compliance with legal and regulatory obligations

3. Scope

This policy applies to:

- Councillors
- Employees
- Suppliers
- Volunteers
- Co-opted members
- Consultants

- Any person acting on behalf of the Council

The policy applies to all Council activities, including:

- Financial management
- Procurement and purchasing
- Grants and funding
- Contracts
- Payroll and expenses
- Use of Council assets and equipment
- Electronic systems and data

4. Definitions

Fraud

Fraud is a deliberate act of deception intended to secure personal gain or cause loss to another party.

Examples include:

- False accounting
- Theft of funds
- Falsified invoices or expenses
- Misuse of Council assets
- Payroll fraud
- Misrepresentation
- Unauthorised financial transactions

Corruption

Corruption involves the abuse of entrusted power for private gain.

Examples include:

- Bribery
- Improper influence
- Abuse of position
- Favouritism
- Undeclared conflicts of interest

Bribery

Bribery includes offering, giving, requesting, or accepting an inducement or reward to influence actions improperly.

5. Principles

The Council shall:

- Conduct business fairly and transparently
- Maintain strong financial controls
- Promote ethical behaviour
- Investigate concerns appropriately
- Take action where wrongdoing is identified
- Cooperate with relevant authorities

All persons associated with the Council are expected to act honestly and with integrity.

6. Responsibilities

6.1 The Council

Treverbyn Parish Council is responsible for establishing and maintaining effective systems of governance, internal control, and accountability.

6.2 The Clerk and Responsible Financial Officer (RFO)

The Clerk/RFO shall:

- Maintain appropriate financial procedures and controls
- Monitor financial transactions
- Investigate concerns appropriately
- Report serious matters to the Council and relevant authorities
- Maintain secure records
- Promote awareness of fraud risks

6.3 Councillors

Councillors shall:

- Act in accordance with the Councillor Code of Conduct
- Declare interests appropriately
- Avoid conflicts of interest
- Protect public resources
- Report suspected fraud or corruption

6.4 Employees and Other Persons

All persons working with or on behalf of the Council must:

- Act honestly and responsibly
- Follow Council procedures
- Protect Council funds and assets
- Report concerns immediately

7. Prevention Measures

The Council shall maintain systems and controls designed to reduce fraud and corruption risks, including:

- Financial Regulations
- Internal controls
- Segregation of duties where practicable
- Authorisation procedures
- Independent audit arrangements
- Bank reconciliation procedures
- Budget monitoring
- Procurement procedures
- Register of Interests
- Proper record keeping

The Council shall also maintain appropriate cyber security arrangements to reduce risks of financial fraud and electronic crime.

8. Gifts and Hospitality

Councillors and staff must not accept gifts, hospitality, or benefits that could improperly influence Council business or create a perception of impropriety.

Modest and reasonable hospitality may be accepted where appropriate.

Any significant gifts or hospitality should be declared in accordance with Council procedures.

9. Conflicts of Interest

Councillors and staff must declare any personal, financial, or other interests that may conflict with Council duties.

Failure to declare relevant interests may constitute misconduct.

10. Reporting Concerns

Any person who suspects fraud, corruption, theft, bribery, or financial irregularity should report concerns immediately to:

- The Clerk/RFO, or

- The Chair of the Council where appropriate

Concerns may relate to:

- Financial irregularities
- Misuse of Council funds
- Theft or misuse of assets
- Improper procurement
- Unauthorised payments
- Cyber-enabled fraud
- Abuse of position

Reports shall be treated seriously and confidentially where possible.

11. Whistleblowing

The Council supports lawful and responsible whistleblowing.

Individuals raising genuine concerns in good faith shall not suffer victimisation or disadvantage as a result of reporting concerns appropriately.

False or malicious allegations may be treated as misconduct.

12. Investigation Procedures

The Council shall investigate allegations proportionately and appropriately.

Investigations may include:

- Examination of records
- Financial review
- Interviews
- Referral to auditors
- Referral to police or regulatory bodies

The Council may seek professional advice where necessary.

13. Recovery of Losses

Where fraud or financial loss has occurred, the Council shall consider appropriate action to recover losses, including:

- Insurance claims
- Civil recovery
- Disciplinary action
- Criminal proceedings

14. Confidentiality

Information relating to suspected fraud or investigations shall be handled sensitively and confidentially where appropriate.

Information shall only be shared on a need-to-know basis or where required by law.

15. Training and Awareness

The Council shall promote awareness of fraud risks and good governance practices among councillors and staff.

Relevant persons are expected to familiarise themselves with:

- Financial Regulations
- Standing Orders
- Codes of Conduct
- Data protection and cyber security procedures

16. Breaches of Policy

Failure to comply with this policy may result in:

- Internal disciplinary procedures
- Withdrawal of delegated powers or access
- Referral to external authorities
- Civil or criminal proceedings

Serious breaches may constitute gross misconduct or criminal offences.

17. Review

This policy shall be reviewed annually or sooner if required due to legislative, operational, or governance changes.

18. Adoption

Adopted by Treverbyn Parish Council on: