



SHEPTON MALLET TOWN COUNCIL

ANTI FRAUD AND CORRUPTION POLICY

Policy Reference Number: 1905

AUTHOR: Town Clerk

RESPONSIBILITY: Policy and Resources Committee

GRADE: Two – Medium

DATE ADOPTED: 19th March 2019

REVIEW DATE: Every three years - March 2022

AMENDMENTS:

1. The Town Council is committed to an effective anti-fraud and corruption strategy to protect its integrity, its assets and to ensure probity.
2. The ethos of the organisation is one of honesty and integrity, belief in the principles and practices of Best Value and opposition to fraud and corruption.
3. All Councillors of the town council are required to abide by Standing Orders as approved from time to time, the Code of Conduct, the Financial Regulations and other governance policies that are adopted.
4. All employees are required to maintain conduct of the highest standard such that confidence in their integrity, motives and impartiality are sustained.
5. Employees are required to assist in ensuring adherence to legal requirements, policy decisions, proper procedures and best practice, including in particular the procurement strategy.
6. All employees must register with the Town Clerk any gifts or hospitality, above £25 level set from time to time, and abide by the provision of the Section 117 of the Local Government Act 1972 regarding any interest in contracts let by the Town Council. This list must be published on the council's website on an annual basis as part of the council's financial year end process.
7. The Responsible Financial Officer will determine a system of financial controls based on a framework of regular management information, financial regulations and administrative procedures which include segregation of duties, appropriate management and supervision and a policy of delegation and accountability.
8. In particular, the system includes:
 - Comprehensive budgeting systems
 - Preparation of regular financial reports which indicate actual expenditure against budget
9. The Town Clerk will appoint an internal auditor, independent of the Responsible Financial Officer, who will report directly to the Town Clerk.
10. A programme of regular internal audit is carried out in accordance with proper practices as determined from time to time, as well as a programme of special investigations to include economy, efficiency and effectiveness of operations.
11. The Town Council's operations, accounts, assets and systems will be subject to an independent annual review by an auditor appointed by the Smaller Authorities Audit Appointments Led (SAAA Ltd) audit following availability of the accounts for public inspection for the period prescribed by statute.
12. The Grievance Procedure is available for use by any employee wishing to make a "qualifying disclosure" under the Public Interest Disclosure Act 1988.
13. The town council supports the principle of continuous development for staff, especially for those involved in the operation of internal control systems, to ensure that there is a culture of continuous improvement.

14. Anyone who believes there has been an incident of fraud or corruption must submit the allegation to the Town Clerk in writing if the allegation is about the council or a councillor. The submission must be in writing to the Chairman of the Council if the allegation is about the Town Clerk.

Other Policies referenced in this document

Standing Orders

Code of Conduct

Financial Regulations

Grievance Procedure