



**HAMPSHIRE
FIRE AND
RESCUE
AUTHORITY**

Purpose: Approval

Date: **9 December 2020**

Title: **ANTI-THEFT, FRAUD, BRIBERY AND CORRUPTION POLICY**

Report of Chief Fire Officer

SUMMARY

1. This report seeks approval for the Authority's Anti-Theft, Fraud, Bribery and Corruption policy.
2. The Authority is determined to discharge its responsibilities to safeguard public funds and is committed to fighting fraud and corruption whether attempted from inside or outside the Authority. The Anti-Theft, Fraud, Bribery and Corruption Policy sets out the Authority's position on such activities.

BACKGROUND

3. The Authority believes strongly in the honesty and integrity of its Members and employees, and expects that all individuals and organisations, including suppliers and contractors, and other stakeholders, will act with the same values.
4. The Authority has responsibilities to ensure that it has the appropriate policies and procedures in place to comply with a number of pieces of external legislation and guidance such as:
 - Theft Act 1968
 - Fraud Act 2006
 - Bribery Act 2010
 - Localism Act 2011
 - CIPFA Code of Practice on managing the risk of fraud and corruption.
5. The Authority and employees also have responsibilities as set out in a number of internal policies and procedures.
6. To support the implementation of integrity and honesty in everything we do and to ensure the Authority acts in accordance with legislation, guidance,

policy and procedure, it is important that the Anti-Theft, Fraud, Bribery and Corruption Policy sets the right direction, is clear and easy to understand for everyone.

POLICY

7. The Anti-Theft, Fraud, Bribery and Corruption Policy states that the Authority will not tolerate fraud, corruption or other irregularities, regardless of the perpetrator and that the Authority is determined to prevent, deter and detect all forms of fraud and corruption committed against it and to take appropriate action where fraud or corruption is detected. The Policy is supported by a number of internal Service policies and guidance which provide clarity around the responsibilities of employees.

SUPPORTING OUR SAFETY PLAN AND PRIORITIES

8. **Public Value.** *We plan over the longer-term to ensure our decisions and actions deliver efficient and effective public services.*
 - (a) The Authority is committed to delivering efficient and effective public services. Ensuring the appropriate policy is in place to combat theft, fraud, bribery and corruption contributes to ensuring Members and employees act with integrity and honesty.
9. **Learning & Improving.** *We have the support of policy and guidance with the freedom to use our discretion to do the right thing, learning from ourselves and others.*
 - (a) The anti-theft fraud, corruption and bribery policy provides the framework in which the Authority operates to ensure continued learning and improvement.
10. The Authority is responsible for providing assurance to the community and to Government on financial, governance and operational matters as set out in the Fire and Rescue National Framework for England. The Anti-theft, Fraud, Bribery and Corruption Policy supports this and sets the expectations for Members and employees to follow.

RESOURCE IMPLICATIONS

11. The implementation of this policy and subsequent procedures is carried out utilising current resources. The Governance and Business Support team work with the Performance and Assurance Directorate, the Southern Internal Audit Partnership and the Shared Services Finance team to ensure compliance.

IMPACT ASSESSMENTS

12. A stage one impact assessment has not highlighted any impacts as a result of the approval of the Anti-Theft, Fraud, Bribery and Corruption Policy.

LEGAL IMPLICATIONS

13. The Authority has responsibility to ensure compliance with legislation to ensure it is acting with honesty and integrity and takes appropriate action where theft, fraud, bribery or corruption is detected. Where such activity is detected, Internal Audit will carry out investigations and if necessary, engage with the legal team for support.

OPTIONS

14. **Option one:** the Authority approve the Anti-theft, Fraud, Bribery and Corruption Policy.
 - (a) The approval and subsequent publishing of the policy sets the direction that the Authority will take relating to theft, fraud, corruption and bribery. Having a published policy that clarifies expectations will assist with Members and employees understanding of the Authority's position.
15. **Option two:** the Authority could choose not to approve the single policy and capture the position in relation to theft, fraud, bribery and corruption within various separate individual policies and documents instead.
 - (a) If the Authority choose not to approve a policy and instead rely on information in a variety of policies and documents, rather than having one single policy, there is a risk that this could create inconsistencies and ambiguity.

RISK ANALYSIS

16. The approval of the Anti-theft, Fraud, Bribery and Corruption Policy sets the expectation for Members and employees and clarifies the Authority's position. Without a policy the Authority is operating with ambiguity and is not setting any expectations relating to how theft fraud, bribery and corruption will not be tolerated.
17. The Policy sets the expectation to Members, Staff, our partners, contractors and suppliers on our position for dealing with theft, fraud, bribery and corruption. The Policy links to our Values and illustrates the culture of the Authority. The absence of a Policy could result in entering partnerships that don't share the same Values and beliefs. Without a Policy setting a position

there is a risk that individuals won't know how the Authority will deal with any instances of theft, fraud, corruption and bribery.

EVALUATION

18. The Anti-theft, Fraud, Bribery and Corruption Policy will be reviewed periodically to ensure it is meeting legislative requirements and supporting the Authority in meeting its priorities. Any acts of theft, fraud, corruption or bribery committed against the Authority will be investigated and reviewed to ensure any learning is captured. Any learning captured which has an impact on the policy will result in amendments being made and an updated version being presented to the Authority for approval.

CONCLUSION

19. The Authority is responsible for ensuring it sets the right culture in relation to theft, fraud, bribery and corruption. The Anti-theft, Fraud, Bribery and Corruption Policy sets the position the Authority takes in ensuring honesty and integrity and how appropriate action will be taken where such activity is detected.
20. The approval and publishing of the Anti-theft, Fraud, Bribery and Corruption Policy creates clarity of the position the Authority takes with regards to this type of activity and removes any ambiguity.

RECOMMENDATION

21. That the Anti-theft, Fraud, Bribery and Corruption Policy be approved by Hampshire Fire and Rescue Authority.
22. That the Anti-theft, Fraud, Bribery and Corruption Policy be published appropriately to ensure clarity of the Authority's position.

APPENDICES ATTACHED

23. Appendix A: Anti-theft, Fraud, Corruption and Bribery Policy

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