



INTEGRITY GROUP

TERMS OF REFERENCE

INTRODUCTION

Tackling fraud is an integral part of protecting public finances. The harm caused by fraud, however, is not just financial. Fraud damages local people and communities, damages the Council's reputation and undermines trust in public services. Every pound lost through fraud cannot be spent on providing and delivering quality services that people rely on and which they pay their taxes to get, therefore it is important to have a strong counter-fraud culture and effective counter-fraud measures embedded within its business processes and governance arrangements.

PURPOSE

The purpose of the Integrity Group is to improve the Council's resilience to fraud, corruption, theft and crime (including cybercrime and money laundering).

REPORTING ARRANGEMENTS

The Integrity Group will be accountable to the Corporate Management Team and the S95 Finance Officer (Chief Officer Corporate Solutions), and annually will provide assurance to CMT and the S95 Finance Officer, and to the Audit Committee.

RESPONSIBILITIES

It is Management's responsibility to design and maintain proper risk management, governance and internal control processes and systems to ensure probity in systems and operations, and mitigation of risks, including the prevention, detection and resolution of fraud and irregularities. Management is also responsible for checking that the arrangements and controls are operating effectively and obtaining assurances from internal compliance, risk, inspection, quality, and control functions. These are known as the first and second lines of defence.

In supporting Management across the whole of the Council to fulfil their responsibilities, the Integrity Group will:

1. Review the level of compliance against the CIPFA code on Managing the Risk of Fraud and Corruption.
2. Assist with developing, reviewing and updating the policies and procedures to mitigate the risk of fraud, corruption, theft and crime (including cybercrime and money laundering), for example, Whistleblowing, Conflicts of Interest, Gifts and Hospitality. Ensure these are communicated effectively throughout the Council.
3. Highlight emerging risks, threats, vulnerabilities and related fraud, corruption, theft and crime (including cybercrime and money laundering) opportunities through our engagement with national forums to share intelligence and best practice.
4. Receive, consider and monitor organisational vulnerability alerts or fraud flags, including those identified via various internal and external sources.

5. Agree appropriate actions to mitigate the risks of fraud, corruption, theft and crime (including cybercrime and money laundering), identifying sustainable preventative measures.
6. Raise awareness of risks and potential implications of bribery, fraud, corruption, theft and crime (including cybercrime and money laundering) in the Council as a method of prevention.
7. Meet during the course of fraud investigations with the aim to take corrective action, minimise losses and help prevent further frauds.
8. Develop an Annual Plan to focus the activity of the Corporate Fraud resources and to target areas where there is a higher risk of fraud.
9. Report annually on corporate fraud activity and outcomes for presentation to CMT (including S95 Finance Officer) and the Audit Committee, or more frequently to CMT or S95 Finance Officer if required for case management.

MEMBERSHIP

To be effective the Group will comprise of members with specific roles and responsibilities associated with these risks and complementary skill sets that will guide and inform decision making. In addition, it will also allow activities to be better coordinated when multiple teams are involved in the investigation process.

The following post holders will be members of the Integrity Group:

- Executive Director (Chair)
- Chief Internal Auditor
- Service Reps CO/HOS
- Procurement Manager
- Human Resources Manager
- Legal Services Manager (and Monitoring Officer)
- Financial Services Manager
- Corporate Fraud Officers
- Information Governance/Security Services Lead

The Chair acts as the coordinator between the Integrity Group and the Serious Organised Crime (SOC) Group (through the existing quarterly meetings).

The Group has the authority to co-opt members or invite other Managers for certain agenda items.

Directorates can send more than one delegate if they see the need in consultation with the Chair.

FREQUENCY OF MEETINGS

The Group is scheduled to meet on a quarterly basis and individuals who cannot attend are requested to send a deputy.

Fraud response meetings will be arranged in response to allegations of fraud. Relevant personnel from the Membership of the Integrity Group will be invited dependent on the nature of the fraud allegation.