

Name of Committee:	Audit & Finance Committee		
Committee Date:	30 th October 2023		
Report Title:	Financial Conduct Policies Review		
Responsible Officer:	Steven Pink		
Cabinet Lead:	Councillor Bowdell		
Status:	Non-Exempt		
Urgent Decision:	Yes / No	Key Decision:	Yes/ No
Appendices:	Appendix A – Whistle Blowing Policy Appendix B – Anti-Fraud and Corruption Policy Appendix C – Anti-Bribery Policy Appendix D – Anti Money Laundering Policy		
Background Papers:	None		
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Report Number:	HBC/045/2023		

Corporate Priorities:

These policies are of vital importance to help protect the integrity of the Council and its operations. They also protect the finances by providing a rigorous framework to support the appropriate use of council taxpayers' money.

Executive Summary:

Havant Borough Council has a number of financial conduct related policies. Following best practice guidelines, these need to be reviewed every year to ensure they are up-to-date and remain relevant.

The following 4 policies have recently been reviewed:

- Whistle Blowing Policy
- Anti-Money Laundering Policy
- Anti-Bribery Policy
- Anti-Fraud and Corruption Policy

All have been updated into our new Policy format with some minor amendments but no major changes were found to be required.

Recommendations:

The Audit and Finance Committee is requested to:

- A. Approve the updated Whistle Blowing Policy.
- B. Approve the updated Anti-Fraud and Corruption Policy
- C. Approve the updated Anti-Bribery Policy
- D. Approve the updated Anti Money Laundering Policy

1.0 Introduction

- 1.1 This paper is submitted to Audit and Finance Committee to introduce the updated list of Financial Conduct policies for oversight and scrutiny before being approved and adopted.
- 1.2 It is vital that the Council has an appropriate policy to cover each of the four areas of financial conduct and whistle blowing.
 - It is worth pointing out that the whistle blowing policy is not just financial, it covers a far greater scope.
- 1.3 It is also important to ensure not only that these policies are in place, but that they are well communicated, understood and adhered to if/when the circumstances are required.

2.0 Background

- 2.1 Following best practice guidelines (under professional bodies guidance, such as CIPFA, ACAS, the LGA etc) Havant Borough Council has a number of policies in place to protect against malpractice and financial and regulatory negligence or misconduct.
- 2.2 Whilst there is no legal requirement to have these policies in place, the processes and actions within them do require the Council to follow specific legal requirements.

- 2.3 These policies are required to be reviewed on an annual basis and amended for any changes in legislation and the deadline for review of the four policies presented here are now overdue.

3.0 Options

- 3.1 Not applicable

4.0 Relationship to the Corporate Strategy

- 4.1 Having strong policies, processes and guidance helps to promote a responsible and transparent Council with high standards of integrity and support the Council being a employer of choice to work for.

5.0 Conclusion

- 5.1 The pre-existing policies were already inclusive of the latest guidance and regulation and no major changes were required.
- 5.2 The policies have been updated into a new standardised format and now include some additional governance elements to capture version control and review dates.
- 5.3 The policies present continue to ensure that the Council is meeting current best practise standards and help to provide assurance that everything is being done minimise any risks associated with the area's they cover.

6.0 Implications and Comments

- 6.1 S151 Comments

It is essential that the Council has current and appropriate measures to combat, prevent, identify and rectify all potential acts of misconduct covered under the policies listed. These policies are vital in protecting the integrity of the Council and to protect the finances of the organisation.

The Audit and Finance Committee should consider it a key priority in their role to be confident that these policies are appropriate for the Council and will deliver the objectives that they are required to achieve.

6.2 Financial Implications

None

6.3 Monitoring Officer Comments

It is the role of the Audit and Finance Committee to approve and monitor Council policies relating to whistleblowing and anti-fraud and corruption.

6.4 Legal Implications

The updates to the reports are minimal in nature. The legal implications of the adoption of the policies were considered at the relevant time. It is good practice to keep policies under review to ensure that they continue to reflect best practice.

6.5 Equality and Diversity

These policies comply with our internal Equality and Diversity policy and practises where applicable.

6.6 Human Resources

These policies have been considered in line with current HR policies and best practise.

6.7 Information Governance

These policies have been considered in line with current information and governance guidelines.

6.8 Climate and Environment

These policies have no impact in this area.

7.0 Risks

7.1 Failure to implement and approve appropriate policies could lead to significant breaches of conduct, bribery or fraud occurring, Damaging the vital financial resources of the Council and it's reputation.

8.0 Consultation

8.1 Not applicable

9.0 Communications

9.1 No applicable

Agreed and signed off by:		Date:
Cabinet Lead:	Cllr N Bowdell	20/10/2023
Executive Head:	Matt Goodwin	20/10/2023
Monitoring Officer:	Jo McIntosh	19/10/2023
Section151 Officer:	Steven Pink	19/10/2023