Borough Council of
King's Lynn &
West Norfolk

Audit Committee

Agenda

Monday, 14th September, 2026
at 4.30 pm

in the

Council Chamber, Town Hall, Saturday Market Place, King's Lynn and available to view on WestNorfolkBC on YouTube.

Borough Council of
King's Lynn &
West Norfolk

King's Court, Chapel Street, King's Lynn, Norfolk, PE30 1EX
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Friday 4th September 2026

Dear Member

Audit Committee

You are invited to attend a meeting of the above-mentioned Panel which will be held on **Monday, 14th September, 2026 at 4.30 pm** in the **Council Chamber, Town Hall, Saturday Market Place, King's Lynn PE30 5DQ** to discuss the business shown below.

Yours sincerely

Chief Executive

AGENDA

1. Appointment of Vice - Chair for Municipal Year 2026/2027

To appoint a Vice – Chair for the Municipal Year

2. Apologies

To receive any apologies of absence.

3. Minutes (Pages 5 - 14)

To approve the minutes from the Audit Committee held on 15th June 2026.

4. Declarations of Interest (Page 15)

Please indicate if there are any interests which should be declared. A declaration of an interest should indicate the nature of the interest (if not already declared on the Register of Interests) and the agenda item to which it relates. If a disclosable pecuniary interest is declared, the Member should withdraw from the room whilst the matter is discussed.

These declarations apply to all Members present, whether the Member is part of the meeting, attending to speak as a local Member on any item or simply observing the meeting from the public seating area.

5. **Urgent Business Under Standing Order 7**

To consider any business which, by reason of special circumstances, the Chairman proposed to accept as urgent under Section 100(b)(4)(b) of the Local Government Act 1972.

6. **Members Present Pursuant to Standing Order 34**

Members wishing to speak pursuant to Standing Order 34 should inform the Chairman of their intention to do so and on what items they wish to be heard before the meeting commences. Any Member attending the meeting under Standing Order 34 will only be permitted to speak on those items which have been previously notified to the Chairman

7. **Chair's Correspondence (if any)**

8. **Annual Treasury Outturn Report 2025/2026** (Pages 16 - 33)

9. **Anti-Fraud and Corruption Action Plan Update** (Pages 34 - 113)

10. **Work Programme and Forward Decision List** (Pages 114 - 126)

To note the Committee's Work Programme for 2026/2027 and the Cabinet's Forward Decision List.

11. **Date of Next Meeting**

To note that the date of the next meeting of the Audit Committee will take place on 16th November 2026 at 4:30pm.

To:

Audit Committee: B Anota, T Barclay, S Bearshaw, T de Winton (Chair) and B Jones

Portfolio Holders:

Councillor C Morley, Portfolio Holder for Finance

Officers:

Emma Hodds, Chief of Staff and Monitoring Officer
Carl Holland, Assistant Director for Finance and Deputy Section 151 Officer
Michelle Drewery, Deputy Chief Executive and Section 151 Officer
Matthew Head, Senior Internal Auditor

AFT BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK

AUDIT COMMITTEE

Minutes from the Meeting of the Audit Committee held on Monday, 15th June, 2026 at 4.30 pm in the Council Chamber, Town Hall, Saturday Market Place, King's Lynn PE30 5DQ

PRESENT: Councillors T de Winton (Chair), S Bearshaw, A Jamieson, B Jones and A Ryves

Portfolio Holders
Councillor A Beales
Councillor C Morley, Finance

Officers:
Kate Blakemore, Chief Executive
Emma Hodds, Chief of Staff and Monitoring Officer
Emma Kavanagh, Chief Operating Officer
Carl Holland, Assistant Director for Finance and Deputy Section 151 Officer
Charlotte Marriott, Interim Corporate Governance Manager
Debbie Ess, Senior Corporate Governance Officer
Matthew Head, Senior Internal Auditor
Teresa Sharman, Head of Internal Audit

External Attendees: David Riglar and Mark Russell for Ernst and Young External Auditors

A1 **APPOINTMENT OF VICE - CHAIR FOR THE MUNICIPAL YEAR 2026/2027**

RESOLVED: Councillor A Jamieson was appointed Vice – Chair for the Municipal Year 2026/2027.

A2 **APOLOGIES**

There were no apologies.

A3 **MINUTES**

RESOLVED: The minutes from he meeting held on the 23rd March 2026 were agreed as a correct record and signed by the Chair.

A4 **DECLARATIONS OF INTEREST**

There were no declarations of interest.

A5 **URGENT BUSINESS UNDER STANDING ORDER 7**

There was no urgent business.

A6 **MEMBERS PRESENT PURSUANT TO STANDING ORDER 34**

There was none.

A7 **AUDIT COMMITTEE TERMS OF REFERENCE**

Click here to view the recording of this item on YouTube.

The Audit Committee reviewed the terms of reference and the Chair asked for comments from the Committee.

Councillor Ryves requested that the Committee arrange private meetings with Internal and External Auditors without Officers present, which was confirmed as already included in the terms of reference and noted as an action for Officers to arrange.

The Assistant Director for Finance and Deputy Section 151 Officer highlighted to the Committee, the terms of reference were updated to include a section on Independent Co-opted Members, reflecting the Committee's intention to appoint such members and aligning with best practice.

Councillor Ryves raised concerns about oversight of wholly owned companies, particularly regarding loan agreements and briefing Members; the Committee agreed to address these issues in future meetings and noted Officers' awareness.

RESOLVED: The Committee noted and agreed to fulfil the Terms of Reference.

A8 **AUDIT AND SCRUTINY RELATIONSHIP PROTOCOL**

Click here to view the recording of this item on YouTube.

The Audit Committee discussed the Audit and Scrutiny relationship protocol to clarify roles and prevent duplication.

The committee discussed the protocol to clarify the distinction between audit and scrutiny functions, with the Democratic Services Officer explaining that the protocol encourages periodic collaboration between Chairs to ensure reports were directed appropriately and avoided overlap.

Councillor Ryves questioned clause 3.2.2 regarding recommendations to the executive; Officers provided clarification and amendment to remove 3.2.2 and 3.2.1 read 'Direct management or approval of budgets. Instead, only making recommendations to executive officers regarding budget considerations related to the internal audit function'.

A9 APPOINTMENT OF INDEPENDENT MEMBERS TO THE AUDIT COMMITTEE

Click here to view the recording of this item on YouTube.

The Assistant Director for Finance and Deputy Section 151 Officer presented the report and explained the interview process for Independent Members, which involved a Panel including Deputy Chief Executive (S151 Officer), and himself, guided by the Audit Chair, using a set of criteria and questions to assess candidates.

The Independent Members were selected based on credentials in risk management and internal audit, with the expectation that they will contribute objectivity and challenge to the Committee, complementing its diversity and expertise.

The Assistant Director for Finance and Deputy Section 151 Officer explained the appointments are for up to four years, subject to references and a probation period of two meetings; Officers confirmed an informal introduction and induction was to be arranged, including participation in upcoming training sessions.

RESOLVED: 1.1 The Audit Committee appointed Michael Laird as Independent Person and Sean Beckett as Independent Person for a term of up to four years commencing on the first meeting following agreement approval of this decision.

1.2 That delegated authority be given to the Assistant Director (Finance) Officer to make any necessary administrative arrangements to formalise the appointments.

A10 EXTERNAL AUDITORS 2024/2025 AUDITOR ANNUAL REPORT

Click here to view the recording of this item on YouTube.

The External Auditor Partner from Ernst and Young presented the report highlighting a disclaimer of opinion for 24-25, improvements in working paper delivery, audit risks for the coming year, and the importance of timely collaboration between the finance team and auditors

The Portfolio Holder, Councillor Morley brought to the Committees attention page 45 which identified the External Auditors conclusion that the Council had proper arrangements in place to manage its resources to ensure it continued to deliver its services.

In response to Councillor Ryves, the External Auditors reported that 40% of working papers were not delivered on time; the Assistant Director of Finance and Deputy Section 151 Officer acknowledged the statistic and provided assurance to the Committee by explaining that additional capacity has been introduced to improve future performance and quality.

The Chief Executive provided further assurance to the Committee and recognised the transformation the Finance team had gone through resulting in now being fully staffed. She provided context to the Committee highlighting the financial stability of the Council.

The Chair, Councillor de Winton referred to page 37 and sought further information on valuation of land, buildings, investment properties and pension valuation. The Assistant Director for Finance and Deputy Section 151 Officer confirmed the valuation on properties were being completed by external valuations and currently on target. Additionally, he advised the pension valuation was highlighted by the External Auditors and that external organisations were given deadlines ahead of schedule to support the timely audit of the Council's Statement of Accounts

In response to the Vice- Chair, Councillor Jamieson question on the wholly owned companies, the Assistant Director for Finance and Deputy Section 151 Officer explained the External Auditors of the Wholly Owned Companies were scheduled to feed into the Audit of the Council's.

RESOLVED: The Audit Committee noted the report.

A11 **EXTERNAL AUDITORS 2025/2026 AUDIT PLAN**

Click here to view the recording of this item on YouTube.

The External Auditor Partner from Ernst and Young presented the report; the 2025-2026 audit plan identified risks including management override, inappropriate capitalisation, revenue recognition, capital accounting, property valuation, pensions, IFRS 16 implementation, and group accounting, with detailed procedures planned for each area.

The Vice- Chair, Councillor Jamieson sought further clarification in the pension liability of Alive Leisure being brought back into the Borough Council. The External Auditor advised this was to be considered including how the pension was set up along with information provided to staff.

In response to Councillor Ryves, the External Auditor explained that a qualified opinion is likely for 25-26 due to historical gaps in audited balances, and outlined the steps required to rebuild assurance and move towards a clean opinion in future years.

In response to the Chair, Councillor de Winton, the External Auditors provided assurance the Audit for 2025 – 2026 was currently on schedule and the working paper supported this. The Assistant Director for Finance and Deputy Section 151 Officer provide context on the response to the backlog since 2021 and the collaborative progress being made with the External Auditors.

In response to a further question from the Vice- Chair, Councillor Jamieson, the External Auditor explained the audit timeline aims for completion by December, with progress updates to be shared with the committee; the External Auditor suggested regular reporting of key performance indicators to track audit progress and address issues proactively.

RESOLVED: The Audit Committee noted the report.

A12 **DRAFT 2026 ANNUAL GOVERNANCE STATEMENT**

Click here to view the recording of this item on YouTube.

The Interim Corporate Governance Manager presented the draft Annual Governance Statement (AGS) for 2025-26, detailing enhancements in assurance processes, identification of significant governance issues, and targeted action plans, with the committee reviewing and recommending the AGS for approval pending external audit feedback.

Key issues identified included inconsistent performance management, workforce capacity and training compliance, financial sustainability, project management framework, information governance, non-compliant procurement spend, and health and safety compliance.

The Chief of Staff and Monitoring Officer explained the AGS process was strengthened by introducing structured assurance statements from assistant directors and service managers, quarterly reviews, and triangulation of evidence, making the AGS an executive-led document.

The Vice – Chair, Councillor, Councillor Jamieson thanked Officers for a comprehensive report and questioned if the Audit Committee could see the Wholly Owned Companies align with the corporate aims.

The Chief of Staff and Monitoring Officer explained the Interim Corporate Governance Manager had taken on the client-side role for wholly owned companies, supporting oversight and risk management, with the Committee expressing interest in reviewing loans and risks associated with these entities.

Appendix 2 of the AGS contains a risk-based action plan addressing significant issues, with operational plans for lower-level improvements; progress is monitored through assurance statements and regular updates.

The Assistant Director for Finance and Deputy Section 151 Officer provided context on procurement and added the historic spend was being considered along with requesting further evidence. He reported a phase one of external assurance and consideration of next phases was to be considered over the next two of months. The Portfolio Holder, Councillor Morley, added further context, noting the wider transformation and work being done.

The Leader, Councillor Beales welcomed the requested assurance from the Committee on the Wholly Owned Companies and outlined the ambition for the Companies and highlighted to the difference and difficulties of the Companies.

The External Auditors confirmed that the review of the AGS focuses on consistency with expected content and messaging, with no findings at present.

RESOLVED: The Audit Committee

1) Reviewed and commented on the draft 2025/26 AGS.
2) Confirmed that the AGS appropriately reflects the Council's governance arrangements and complies with the requirements of the CIPFA Addendum.
3) Recommended the AGS for approval and inclusion within the 2025/26 Statement of Accounts, pending external auditor feedback.

A13 **2026 - 2027 CORPORATE RISK REGISTER UPDATE**

Click here to view the recording of this item on YouTube.

The Senior Corporate Governance Officer presented the corporate risk register for 2026-2027, highlighting changes in risk categorisation, new risks, and alignment with AGS actions.

The assignment of risks to Executive Leadership Team has been reviewed and changes include separating the data management risk to introduce a new cyber security risk The officer explain the reputation management risk is embedded in all risk and so the separate. The cost-of-living risk has been removed as a result of the administration of funding and administration moving got the County. A new risk related to the St James's swimming pool has been added

Councillor Ryves questioned the green rating for wholly owned companies, with the Chief of Staff and Monitoring Officer along with the Leader providing assurance about robust governance, client side oversight, and the role of the Shareholder Committee, while agreeing to increase Audit Committee exposure.

In response to the Vice – Chair, Councillor Jamieson, the Chief of Staff and Monitoring Officer explained the criteria for risk scoring, offering to provide the committee with details of impact and likelihood assessments and the cascade between operational and corporate risk registers.

In response to Councillor Jones, the Chief of Staff and Monitoring Officer explained the data management risk score increased due to greater knowledge and identified areas for improvement, with action plans in place.

Councillor Ryves sought further clarification on the risk for community cohesion. The Chief Executive explained community cohesion remains a high risk due to national and local factors, supported by local data and interventions.

The Chair, Councillor de Winton referred to risk R17 – Health and Safety. The Chief Executive explained efforts were underway to centralise asset management and improve health and safety compliance, with recent positive feedback from an HSE Audit and ongoing work expected to reduce risk levels in the coming months.

Portfolio Holder, Councillor Morley highlighted the work the IT department were doing to resolve both cyber security and data management.

RESOLVED: The Audit Committee noted the update to the corporate risk register.

A14 ANNUAL INTERNAL AUDIT PROGRESS REPORT

Click here to view the recording of this item on YouTube.

The Head of Internal Audit presented the report. presented the internal audit progress report noting outstanding recommendations, and reasonable overall assurance, with the committee discussing audit planning, contract management, and the role of the audit committee in selecting audit areas.

The final progress report for 25-26 included five executive summaries with positive assurance, deferred cyber security audit, and 47 outstanding recommendations, some of which are longstanding and high priority.

Councillor Ryves commented the overall number of recommendations had reduced but provided examples such as car parking which remained an issue. He noted a contradiction in the risk management of Alive Leisure. The Head of Internal Audit reported positive assurance on Alive Leisure being brought in house but recognised the External Auditors identifying this as a risk.

The Chair, Councillor de Winton sought clarification on the company ACEOM. The Senior Internal Auditor confirmed this was a consultant used for the Car Parking Strategy. In response to the Chair, the Chief of Staff and Monitoring Officer commented current issues with civil enforcement would not be included in the progress report due the outstanding recommendation referring to a previous audit.

The Chair, Councillor de Winton sought clarification that Section 106 agreement were monitored. The Leader responded and provided assurance the agreements were monitored.

RESOLVED: The Audit Committee received the Progress Report on internal audit activity.

A15 ANNUAL INTERNAL AUDIT OPINION REPORT

Click here to view the recording of this item on YouTube.

The Head of Internal Audit reported the annual opinion provided reasonable assurance on internal control, risk, and governance, acknowledging reduced recommendations but highlighting weaknesses in certain areas and the need for timely implementation.

The Chief Executive highlighted to the Committee the outstanding recommendations were noted and identified the significant improvement which had been made but recognised the remaining needed resolving. She explained the shift in Audit was to focus on adding value to areas of highest risk and welcomed independent recommendations to support continued improvements.

The Committee discussed the importance of audit committee input in selecting audit areas, with the Chief of Staff and Monitoring Officer confirming existing collaborative planning processes and the Head of Internal Audit highlighting the right to meet auditors privately, encouraging informal sessions to raise concerns.

In response to the Vice – Chair, Councillor Jamieson, the Assistant Director for Finance and Deputy Section 151 Officer, explained a contract management audit was recently completed, focusing on a sample of contracts and management processes; The conclusion of the current audit will provide the committee with visibility of the contract register and further insight into procurement and contract management.

RESOLVED: The Audit Committee

1) Received and considered the contents of the Annual Opinion Report of the Head of Internal Audit.
2) Noted that a reasonable audit opinion has been given in relation to the framework of governance, risk management and control for the year ended 31 March 2026.
3) Noted that the opinions expressed together with significant matters arising from internal audit work and contained within this report should be given due consideration when developing and reviewing the Council's Annual Governance Statement for 2025/26.
4) Noted the outcomes of the Internal Audit's performance measures and the Quality Assurance and Improvement Programme (QAIP).

A16 CHAIR'S CORRESPONDENCE

The Chair addressed the Committee and outlined plans for training sessions covering key governance topics, with three sessions scheduled for Committee Members and new Independent Members, aiming to ensure a common foundation and support effective participation.

The Chair highlighted to the Committee the training points to be covered in three sessions, each including discussion and Q&A, scheduled for evenings to accommodate Members' schedules.

The Assistant Director for Finance and Deputy Section 151 Officer confirmed that new independent members will participate in the training and receive an informal introduction to the committee, with dates to be arranged ahead of the September meeting.

A17 WORK PROGRAMME AND FORWARD DECISION LIST

The Committee reviewed the work programme and cabinet forward decision list, confirming plans to include wholly owned subsidiaries as a specific item and noting the schedule for future meetings and agenda items.

RESOLVED: The Audit Committee noted the Work Programme and the Forward Decisions List.

A18 DATE OF NEXT MEETING

The next meeting of the Audit Committee was scheduled to take place on the 14th September 2026 at 4:30pm in the Council Chamber, Town Hall, Saturday Market Place, King's Lynn.

<u>The meeting closed at 6.42 pm</u>

Borough Council of
King's Lynn &
West Norfolk

DECLARING AN INTEREST AND MANAGING ANY CONFLICTS FLOWCHART

START

Does the matter directly relate to one of your DPIs?

YES ←

Declare the interest. You have a **conflict** and cannot act or remain in the meeting *

→ NO

Does the matter directly relate to the finances or wellbeing of one of your ERIs?

YES ↙

Declare the interest. You have a **conflict** and cannot act or remain in the meeting *

↓ NO

Does it directly relate to the finances or wellbeing of you, a relative or a close associate?

YES ←

Declare the interest. You have a **conflict** and cannot act or remain in the meeting *

↓ NO

Does it affect the finances or wellbeing of you, a relative, a close associate or one of my ERIs?

YES ←

Declare the interest. Are you or they affected to a greater extent than most people? And would a reasonable person think you are biased because of the interest?

↓ YES

You have a **conflict** and cannot act or remain in the meeting *

↓NO

Take part as normal

↓ NO

Does it relate to a Council Company or outside body to which you are appointed by the Council?

YES ↙

Declare the interest. Do you, or would a reasonable person think there are competing interests between the Council and the company/outside body?

YES ←

You can remain the meeting if the Chair agrees, for you to speak in your external capacity only. Do not vote.

NO ←

You can take part in discussions but make clear which capacity you are speaking in. Do not vote.

↓ NO

Does another interest make you that feel you cannot act in a fair, objective or open manner? Would a reasonable person knowing the same interest think you could not act in a fair, objective or open manner?

↙ NO TO BOTH

Declare the interest for the sake of openness and transparency. Then take part as normal.

YES TO ONE ↓

You have a **conflict**. Declare the interest. Do not participate and do not vote.

* without a dispensation

Glossary:
DPI: Disclosable Pecuniary Interest
ERI: Extended Registrable Interest

Other actions to mitigate against identified conflicts:
1. Don't read the papers
2. Tell relevant officers
3. Ask to be removed from any email recipient chain/group

Agenda Item 8

-REPORT TO:	**AUDIT COMMITTEE**		
DATE:	14th September 2026		
TITLE:	**ANNUAL TREASURY OUTTURN REPORT 2025/2026**		
TYPE OF REPORT:	Recommendation		
PORTFOLIO(S):	Cllr Chris Morley E-mail: cllr.chris.morley@west-norfolk.gov.uk		
REPORT AUTHOR:	Carl.Holland@west-norfolk.gov.uk		
OPEN/EXEMPT	Open	WILL BE SUBJECT TO A FUTURE CABINET REPORT:	*No*

Date of meeting: 14th September 2026

ANNUAL TREASURY OUTTURN REPORT 2025/2026

Summary
The Council has formally adopted the Chartered Institute of Public Finance and Accountancy's Code of Practice on Treasury Management (2017) and remains fully compliant with its requirements.

This Annual Treasury Outturn Report looks backwards at 2025/2026 and covers:

1. The 2025/2026 Treasury Outturn
2. Compliance with Treasury Limits
3. Outturn Summary

Additional supporting information:

Appendix 1 – Economic Outlook
Appendix 2 - Investments as at 31 March 2026
Appendix 3 - Borrowing as at 31 March 2026
Appendix 4 - Prudential Indicators

The Council's annual Treasury Strategy Statement 2025/2026 were approved by Council on the 27 February 2025.

Recommendations

1. The Audit Committee is asked to note the annual treasury outturn position for 2025/2026.

Reason for the Decision
The Council must make an annual review of its Treasury operation for the previous year, as part of the CIPFA code of Practice.

1. The Annual Treasury Management Review 2025/2026

1.1 This Council is required by regulations issued under the Local Government Act 2003 to produce an annual treasury management review of activities and the actual prudential and treasury indicators for 2025/2026. This report meets the requirements of both the CIPFA Code of Practice on Treasury Management, (the Code), and the CIPFA Prudential Code for Capital Finance in Local Authorities, (the Prudential Code).

1.2 During 2025/2026 the minimum reporting requirements were that the full Council should receive the following reports:

- an annual treasury strategy in advance of the year (Council 27 February 2025)
- a mid-year, (minimum), treasury update report (Audit Committee 17 February 2026)
- an annual review following the end of the year describing the activity compared to the strategy, (this report)

1.3 The regulatory environment places responsibility on members for the review and scrutiny of treasury management policy and activities. This report is, therefore, important in that respect, as it provides details of the outturn position for treasury activities and highlights compliance with the Council's policies previously approved by members.

1.4 This Council confirms that it has complied with the requirement under the Code to give prior scrutiny to all of the above treasury management reports by the Audit Committee before they were reported to the full Council.

2. Executive Summary

2.1 During 2025/2026, the Council complied with its legislative and regulatory requirements. The key actual prudential and treasury indicators detailing the impact of capital expenditure activities during the year, with comparators, are as follows:

Prudential and treasury indicators	2024/2025 Actual £'000	2025/2026 Actual £'000
Capital expenditure	39,657	39,561
Capital Financing Requirement	83,431	99,948
Gross borrowing	38,500	40,000
External debt *	38,627	40,102
Investments *	17,149	8,625
Net borrowing/(investments)	21,478	31,477

* Both the External debt and Investments figures shown in the table above include interest accruals. Whereas elsewhere in the report the amounts shown are the principal amounts only.

2.2 Details of prudential and treasury indicators follow below in the main body of this report.

2.3 As reported in section 5 of this report the Section 151 officer of the Council, confirms that –

- borrowing was only undertaken for capital purpose and that the spend on revenue is funded in accordance with the approved budget,
- that the statutory borrowing limit, (the authorised limit), was not breached, and
- that the cost of borrowing is an affordable proportion of the net revenue stream.

2.4 As reported in the year the Council's Treasury advisors presented an opportunity to refinance the Council's £10m of long terms loans. This has moved the borrowing to a short-term refinancing model, whilst at the same time presenting a net saving to the Councils revenue spend (circa £200k p.a for 10 years).

2.5 The Council budgeted a return of 3.19% and achieved an actual return of 3.97%.

3. Introduction and Background

3.1 This report covers the following:-

- Capital activity during the year i.e. capital expenditure and financing (section 4 below);
- Impact of this activity on the Council's underlying indebtedness, i.e. the Capital Financing Requirement (section 5 below);
- The actual prudential and treasury indicators;
- Overall treasury position identifying how the Council has borrowed in relation to this indebtedness, and the impact on investment balances (section 6 below);
- Summary of interest rate movements in the year;
- Detailed debt activity; and
- Detailed investment activity

4. The Council's Capital Expenditure and Financing

4.1 The Council undertakes capital expenditure on long-term assets. These activities may either be:

- Financed immediately through the application of capital or revenue resources (capital receipts, capital grants, revenue contributions etc.), which has no resultant impact on the Council's borrowing need; or
- If insufficient financing is available, or a decision is taken not to apply resources, the capital expenditure will give rise to a borrowing need.

4.2 The actual capital expenditure forms one of the required prudential indicators. The table below shows the actual capital expenditure and how this was financed.

General Fund	2024/2025 Actual £'000	2025/2026 Actual £'000
Capital expenditure	39,657	39,561
Financed in year	19,226	20,920
Unfinanced capital expenditure	20,431	18,641

5. The Council's Overall Borrowing Need

5.1 The Council's underlying need to borrow for capital expenditure is termed the Capital Financing Requirement (CFR). This figure is a gauge of the Council's indebtedness. The CFR results from the capital activity of the Council and resources used to pay for the capital spend. It represents the 2025/2026 unfinanced capital expenditure (see above table), and prior years' net or unfinanced capital expenditure which has not yet been paid for by revenue or other resources.

5.2 Part of the Council's treasury activities is to address the funding requirements for this borrowing need. Depending on the capital expenditure programme, the treasury service organises the Council's cash position to ensure that sufficient cash is available to meet the capital plans and cash flow requirements. This may be sourced through borrowing from external bodies, (such as the Government, through the Public Works Loan Board [PWLB], or the money markets), or utilising temporary cash resources within the Council.

5.3 Reducing the CFR – the Council's underlying borrowing need (CFR) is not allowed to rise indefinitely. Statutory controls are in place to ensure that capital assets are broadly charged to revenue over the life of the asset. The Council is required to make an annual revenue charge, called the Minimum Revenue Provision – MRP, to reduce the CFR. This is effectively a repayment of the borrowing need. This differs from the treasury management arrangements which ensure that cash is available to meet capital commitments. External debt can also be borrowed or repaid at any time, but this does not change the CFR.

5.4 The total CFR can also be reduced by:

- the application of additional capital financing resources, (such as unapplied capital receipts); or
- charging more than the statutory revenue charge (MRP) each year through a Voluntary Revenue Provision (VRP).

5.5 The Council's 2025/2026 MRP Policy, (as required by Department for Levelling Up, Housing and Communities Guidance), was approved as part of the Treasury Management Strategy Report for 2025/2026 on 27 February 2025.

5.6 The Council's CFR for the year is shown below and represents a key prudential indicator. It includes leasing schemes that are on the balance sheet, as these increase the Council's borrowing need.

CFR (£m): General Fund	**31 March 2024/2025 Actual £'000**	**31 March 2025/2026 Actual £'000**
Opening Balance	65,379	83,431
Add unfinanced capital expenditure (as above 4.2)	20,431	18,641
Less MPR/VRP	(2,379)	(2,124)
Closing Balance	**83,431**	**99,948**

5.7 Borrowing activity is constrained by prudential indicators for gross borrowing and the CFR, and by the authorised limit.

5.7.1 **Gross borrowing and the CFR** - in order to ensure that borrowing levels are prudent over the medium term and only for a capital purpose, the Council should ensure that its gross external borrowing does not, except in the short term, exceed the total of the capital financing requirement in the preceding year (2024/25) plus the estimates of any additional capital financing requirement for the current (2025/26) and next two financial years. This essentially means that the Council is not borrowing to support revenue expenditure. This indicator allowed the Council some flexibility to borrow in advance of its immediate capital needs in 2025/26. The table below highlights the Council's gross borrowing position against the CFR. The Council has complied with this prudential indicator.

	31 March 2025 Actual £'000	**31 March 2026 Actual £'000**
Gross borrowing position	38,500	40,000
CFR	83,431	99,948
(Under) / over funding of CFR	(44,931)	(59,948)

5.8 **The authorised limit** - the authorised limit is the "affordable borrowing limit" required by s3 of the Local Government Act 2003. Once this has been set, the Council does not have the power to borrow above this level. The table below demonstrates that during 2025/2026 the Council has maintained gross borrowing within its authorised limit.

5.9 **The operational boundary** – the limit beyond which external debt is not normally expected to exceed. Periods where the actual position is either below or over the boundary are acceptable subject to the authorised limit not being breached. The S151 Officer confirms this limit has not been breached.

5.10 **Actual financing costs as a proportion of net revenue stream** - this indicator identifies the trend in the cost of capital, (borrowing and other long-term obligation costs net of investment income), against the net revenue stream.

5.11 At 3.79% debt is manageable to fund the approved capital programme, and 96.21% directly funding the services in the Revenue Budget. Whilst borrowing costs have increased over the previous year, the balance sheet (draft Statement of Accounts 2025/2026) supports reasoning for use of borrowing towards the Capital Programme through an increase in value for :

- Asset under construction (£12.866m), and
- Assets Held for sale (£5.362m).

	2025/2026 £'000
Authorised limit	94,000
Maximum gross borrowing position during the year	45,000
Operational boundary	84,000
Average gross borrowing position	32,790
Financing costs as a proportion of net revenue stream	3.79%

6 Treasury Position as at 31 March 2026

6.1 The Council's treasury management debt and investment position is organised by the treasury management service in order to ensure adequate liquidity for revenue and capital activities, security for investments and to manage risks within all treasury management activities. Procedures and controls to achieve these objectives are well established both through member reporting detailed in the summary, and through officer activity detailed in the Council's Treasury Management Practices. At the end of 2025/2026, the Council's treasury position (excluding borrowing by finance leases) was as follows:

DEBT PORTFOLIO	31 March 2025 Principal £'000	Rate/ Return	31 March 2026 Principal £'000	Rate/ Return
Fixed rate funding:				
- PWLB	20,000	4.86%	28,000	4.86%
- Market (Maturity Loan)	10,000	3.81%	0	0%
- Local Authorities (Maturity Loans)	8,500	5.65%	12,000	5.40%
Total debt	**38,500**		**40,000**	
CFR	**83,431**		**99,948**	
Over / (under) borrowing	**(44,931)**		**(59,948)**	
Total investments	**17,015**	**4.3%**	**8,530**	**3.83%**
Net of debt and investments	**(21,485)**		**(31,470)**	

6.2 The maturity structure of the debt portfolio was as follows:

	31 March 2025 Actual £'000	31 March 2026 Actual £'000
Under 12 months	28,500	40,000
12 months and within 24 months	-	-
2 years and within 50 years	-	-
Over 50 years	10,000	0

As at the 31 March 2026 the council had three short-term loans with a collective value of £40,000,000 due to mature during 2026/2027. The two market loans with Barclays of £5,000,000 each were repaid during 2025/2026 at a discounted rate.

The £8,530,000 investments at the year-end comprised of; £2,710,000 Money Market Funds, and £5,820,000 in instant access bank accounts.

6.3 Full details for both the borrowing and the investments can be found in Appendices 1 and 2.

INVESTMENT PORTFOLIO	Actual 31 March 2025 £000	Actual 31 March 2025 %	Actual 31 March 2026 £000	Actual 31 March 2026 %
Treasury investments				
Call Accounts / Instant Access Accounts	0	0	5,820	68%
Money Market Funds	13,015	76%	2,710	32%
Local authorities	4,000	24%	0	0
Other Short Term Fixed Investments	0	0	0	0
TOTAL TREASURY INVESTMENTS	**17,015**	**100%**	**8,530**	**100%**

6.4 The maturity structure of the treasury investment portfolio was as follows:

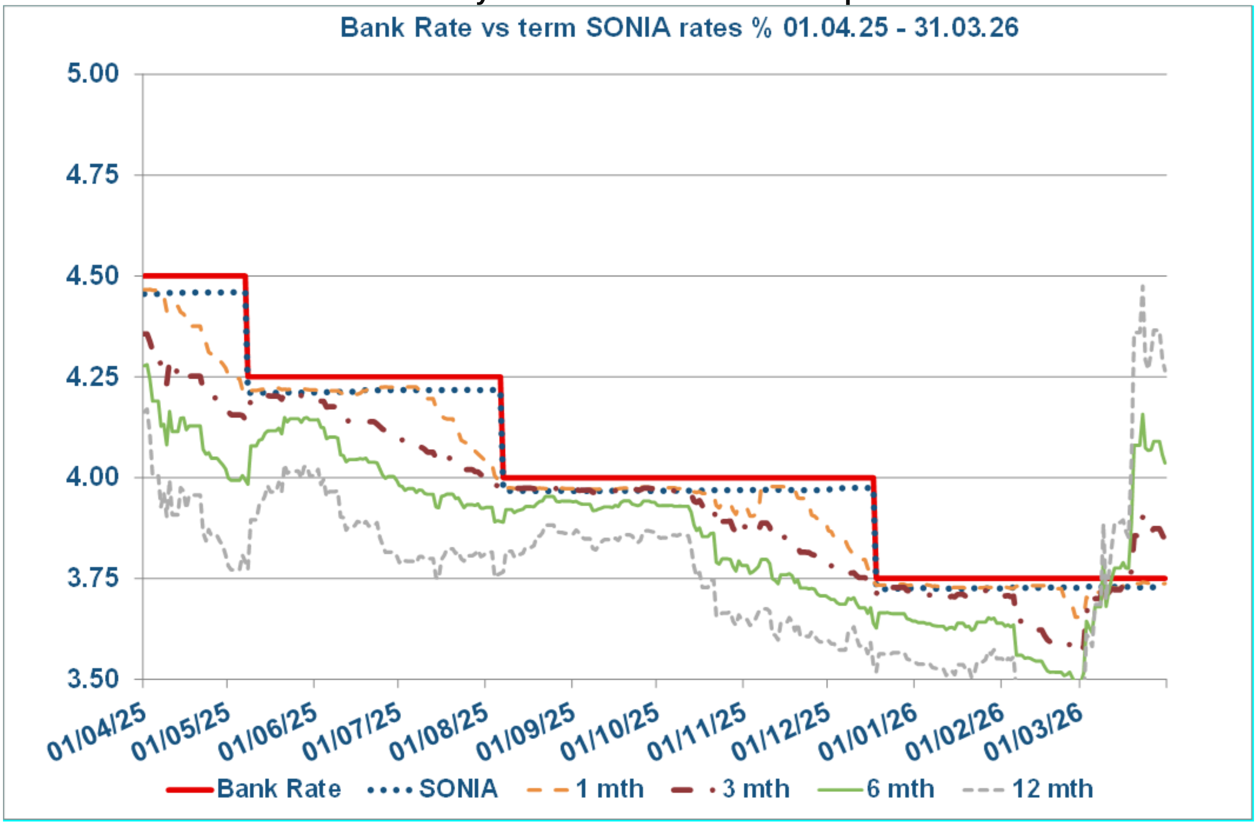
	31 March 2025 Actual £000	31 March 2026 Actual £000
Treasury Investments:		
Longer than 1 year	0	0
Up to 1 year	17,015	8,530
Total	**17,015**	**8,530**

7 The Strategy for 2025/2026

7.1 Investment strategy and control of interest rate risk

Investment Benchmarking Data – Sterling Overnight Index Averages (Term) 2025/26

This table shows the movement of key beanchmark rates over the previous 12 months.



7.2 Investment returns remained robust throughout 2025/26 with Bank Rate reducing steadily through the course of the financial year (three 0.25% rate cuts in total), and even at the end of March the yield curve had turned positive, reflecting inflation concerns emanating from the on-going conflict in the Middle East.

Bank Rate reductions of 0.25% occurred in May, August and December, bringing the headline rate down from 4.5% to 3.75%. Two of the Bank Rate cuts occurred in the same month as the Bank of England publishes is Quarterly Monetary Policy Report, therein providing a clarity over the timing of potential future rate cuts.

As of early April 2026, market sentiment has been heavily influenced by the Middle East conflict. Commentators anticipate a growing risk of inflation, meaning interest rates will not be cut for some time, and may increase to counteract inflationary pressures rising from steepening energy costs. Growth will also be impacted in many regions of the world. UK GDP is projected by the Office for Budget Responsibility (3 March 2026) to be 1.1% in 2026 before picking up to 1.6% in 2027 and 2028. But the likelihood is that there is downside risk to this forecast given events in the Middle East through March and still on-going.

Looking back through 2025/26, returns in a range of 4.5% - 5% for periods ranging from 1 month to 12 months in the spring of 2025. By end of March 2026, deposit rates were somewhat volatile, regaining some traction as the Middle East conflict suggested energy driven inflation may lead to higher interest rates than would otherwise have been the case. Where liquidity requirements were not a drain on day-to-day investment choices, extending duration through the use of "laddered investments" paid off, ensuring that maturity dates and investment periods vary to improve flexibility of access to market, better managing risk and reward.

Heading into 2026/27, UK inflation is likely to increase to over 4% in the coming months as oil prices, for example, remain close to $100 per barrel, over 50% higher than before the Middle East conflict started.

7.3 Borrowing strategy and control of interest rate risk

7.4 During 2025/26, the Authority maintained an under-borrowed position. This meant that the capital borrowing need, (the Capital Financing Requirement), was not fully funded with loan debt as cash supporting the Authority's reserves, balances and cash flow was used as an interim measure. This strategy was prudent as near-term investment rates have generally been lower than medium to long-term borrowing costs. The latter are expected to fall a little through 2026 and 2027 in the light of economic growth concerns and the eventual dampening of inflation. The Authority has sought to minimise the taking on of long-term borrowing at elevated levels (>5%) and has focused on a policy of internal and temporary borrowing, supplemented by short-dated borrowing (<5 years) as appropriate.

7.6 Interest rate forecasts initially suggested gradual reductions in short, medium and longer-term fixed borrowing rates during 2025/26. Whilst the Bank Rate did reduce to 3.75% as anticipated, the initial expectation of significant rate reductions did not transpire, primarily because inflation concerns remained elevated in March 2026.

At the start of April 2026, the market expected the Bank Rate to increase over the coming months to 4% of 4.25%, from 3.75%, whilst all parts of the curve have also risen substantially through March. A significant fall in inflation will be required to underpin any material movement lower in the longer part of the curve.

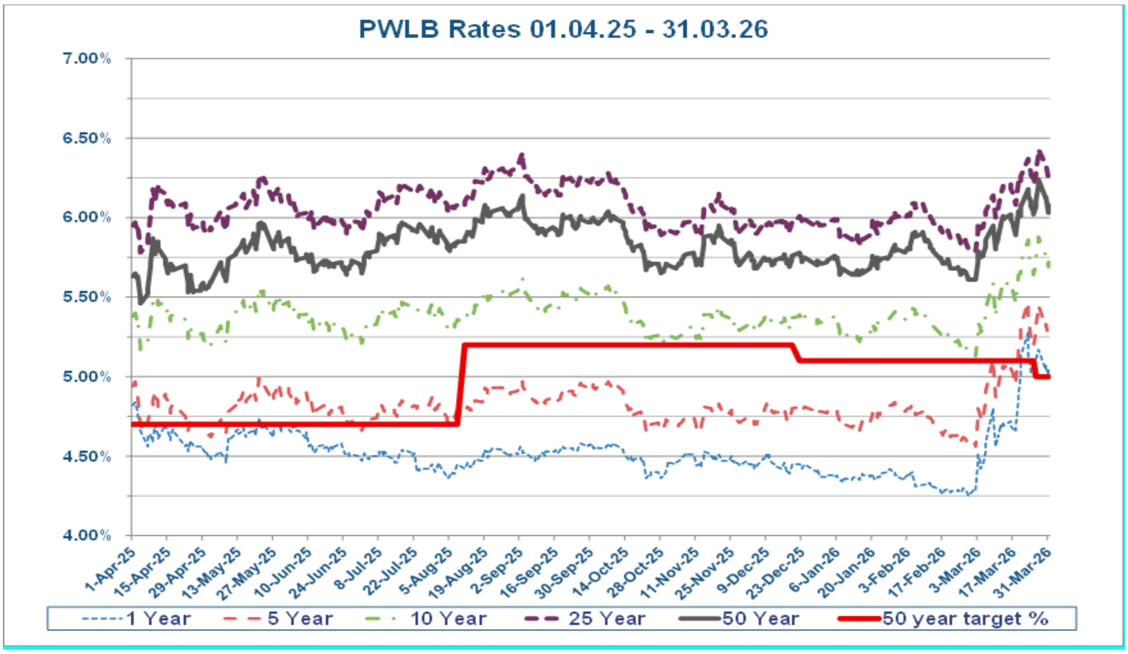
Forecasts at the time of approval of the treasury management strategy report for 2025/26 were as follows:

MUFG Corporate Markets Interest Rate View 11.11.24													
	Dec-24	Mar-25	Jun-25	Sep-25	Dec-25	Mar-26	Jun-26	Sep-26	Dec-26	Mar-27	Jun-27	Sep-27	Dec-27
BANK RATE	4.75	4.50	4.25	4.00	4.00	3.75	3.75	3.75	3.50	3.50	3.50	3.50	3.50
3 month ave earnings	4.70	4.50	4.30	4.00	4.00	4.00	3.80	3.80	3.80	3.50	3.50	3.50	3.50
6 month ave earnings	4.70	4.40	4.20	3.90	3.90	3.90	3.80	3.80	3.80	3.50	3.50	3.50	3.50
12 month ave earnings	4.70	4.40	4.20	3.90	3.90	3.90	3.80	3.80	3.80	3.50	3.50	3.50	3.50
5 yr PWLB	5.00	4.90	4.80	4.60	4.50	4.50	4.40	4.30	4.20	4.10	4.00	4.00	3.90
10 yr PWLB	5.30	5.10	5.00	4.80	4.80	4.70	4.50	4.50	4.40	4.30	4.20	4.20	4.10
25 yr PWLB	5.60	5.50	5.40	5.30	5.20	5.10	5.00	4.90	4.80	4.70	4.60	4.50	4.50
50 yr PWLB	5.40	5.30	5.20	5.10	5.00	4.90	4.80	4.70	4.60	4.50	4.40	4.30	4.30

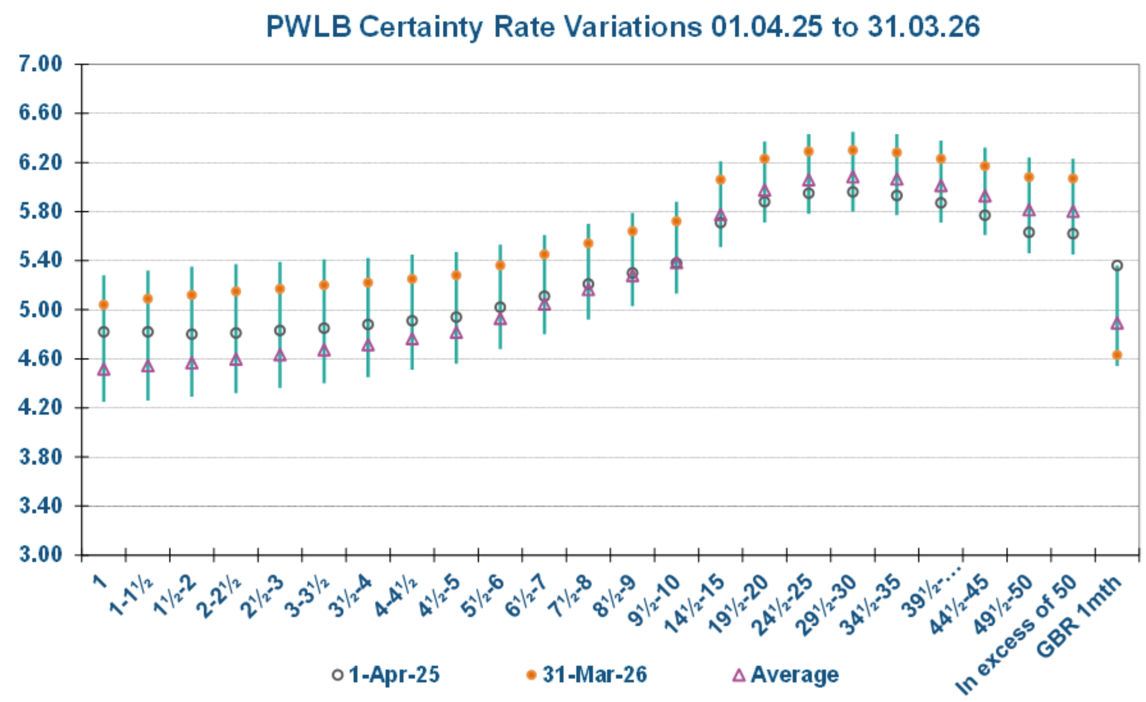
PWLB RATES 2025/26

The PWLB lending facility is operated by the UK Debt Management Office (DMO) on behalf of HM Treasury and provides loans to local authorities, and other specified bodies, from the National Loans Fund, operating within a policy framework set by HM Treasury. This borrowing is for capital projects.

The above graph represents the movement in future loan rates over time.



The graph below attempts to identify the range in which the interest rates (cost of loans) is expected to vary over time. This is then replicated in part in the table below where key points in time are evaluated.



At the time of its creation, the forecast for the first year was that the interest rate would be no higher than 5.28% and no lower than 4.25%. The final row in the table, 'Spread' identifies the difference between the two rates, which then gives an indication as to how confident they are of future rates.

PWLB rates are based on gilt (UK Government bonds) yields through HM Treasury determining a specified margin to add to gilt yields. The main influences on gilt yields are Bank Rate, inflation expectations and movements in US treasury yields. Inflation targeting by the major central banks has been successful over the last 30 years in lowering inflation and the real equilibrium rate for central rates has fallen considerably due to the high level of borrowing by consumers: this means that central banks do not need to raise rates as much now to have a major impact on consumer spending, inflation, etc. This has pulled down the overall level of interest rates and bond yields in financial markets over the last 30 years.

HIGH/LOW/AVERAGE PWLB RATES FOR 2025/26

	1 Year	5 Year	10 Year	25 Year	50 Year
Low	4.25%	4.56%	5.13%	5.78%	5.46%
Date	27/02/2026	27/02/2026	02/03/2026	04/04/2025	04/04/2025
High	5.28%	5.47%	5.88%	6.43%	6.24%
Date	23/03/2026	23/03/2026	27/03/2026	27/03/2026	27/03/2026
Average	4.52%	4.82%	5.38%	6.06%	5.81%
Spread	1.03%	0.91%	0.75%	0.65%	0.78%

7.7 However, since early 2022, yields have risen dramatically in all the major developed economies, first as economies opened post-Covid; then because of the inflationary impact of the war in Ukraine in respect of the supply side of many goods. In particular, rising cost pressures emanating from shortages of energy and some food categories have been central to inflation rising rapidly. More recently , the Middle East conflict is likely to see inflation spike higher from late spring 2026 through to early 2027.

7.8 Gilt yields have been volatile through 2025/26. The low point for long-term rates of 25 and 50 years' duration was reached early in April 2025, whilst the low points for short and medium dated rates were reached in early 2026, prior to the outbreak of the Middle East conflict.

At the close of 31 March 2026, the 1-year PWLB Certainty rate was 5.04% whilst the 25-year rate was 6.29% and the 50-year rate was 6.08%.

Regarding PWLB borrowing rates, the various margins attributed to their pricing are as follows: -

- **PWLB Standard Rate** is gilt plus 100 basis points (G+100bps)
- **PWLB Certainty Rate** is gilt plus 80 basis points (G+80bps)
- **Local Infrastructure Rate** is gilt plus 60bps (G+60bps)

8 Borrowing Outturn

8.1 Long-term borrowing was not undertaken during the year. Short-term borrowings were sought during 2025/26 for cashflow purposes which are fully repaid. In addition a short term loan has been used to repay the Councils long term loans.

8.2 A sum of £28,000,000 was drawn from the PWLB to fund unfinanced capital expenditure, this is also classed as short-term as the maturity is within 12 months. At the end of the term when the repayment is due, resources will be assessed to determine if the loan is still required. It is expected that rates will be lower by this time if there is a need.

Lender	Principal	Type	Interest Rate	Maturity
PWLB	£28m	Fixed interest rate	3.51%	1 year

8.3 **Borrowing in advance of need**
The Council has not borrowed more than, or in advance of its needs, purely in order to profit from the investment of the extra sums borrowed.

8.4 **Rescheduling**
There was no rescheduling during the year.

9 Investment Outturn

9.1 Investment Policy – the Council's investment policy is governed by MHCLG investment guidance, which has been implemented in the annual investment strategy approved by the Council on 27 February 2025. This policy sets out the approach for choosing investment counterparties and is based on credit ratings provided by the three main credit rating agencies, supplemented by additional market data, (such as rating outlooks, credit default swaps, bank share prices etc.).

9.2 **Resources** – the Council's cash balances comprise revenue and capital resources and cash flow monies. The Council's core cash resources comprised as follows:

Balance Sheet Resources	31 March 2025 £'000	31 March 2026 £'000 *
Balances	8,097	10,430
Earmarked reserves	33,445	34,640
Provisions	1,004	1,237
Usable capital receipts	6,744	6,973
Total	**49,290**	**53,280**

*The figures are provisional until the finalised audit of the 2025/2026 statement of accounts

9.3 **Investments held by the Council**

- The average balance of investments for the year was £15,943,000
- The average rate of return for the year on investments was 3.97%

10 **Background Information**

- Monthly budget monitoring reports
- Annual Treasury Strategy (Council 27 February 2025)

Appendix 1 – Economic Outlook

The following is provided by the Councils Treasury Advisors – MUGF Corporate Markets (April 26)

UK Economy

UK inflation has proved somewhat stubborn throughout 2025/26. Having started the financial year at 3.5% y/y (April), the CPI measure of inflation peaked at 3.8% from July to September, before dipping to 3% in January and February. Core inflation picked up to 3.2% in February, from 3.1%, and the recent upward pressure on energy costs could see CPI inflation breach 4.5% later this year.

Against this backdrop, the continued lack of progress in ending the Russian invasion of Ukraine, and the potentially negative implications for global growth as a consequence of the implementation of US tariff policies, Bank Rate reductions look limited for the remainder of 2026 (as they do in the euro-zone). The Bank Rate currently stands at 3.75%.

Moreover, borrowing has becoming increasingly expensive in 2025/26. Gilt yields have risen materially in March 2026, more than reversing the falls earlier in the financial year.

The table below provides a snapshot of the conundrum facing central banks: inflation pressures remain, labour markets are still relatively tight by historical comparisons, and central banks are also having to react to a fundamental re-ordering of economic and defence policies by the US administration.

	UK	Eurozone	US
Bank Rate	3.75%	2.0%	3.5% - 3.75%
GDP	0.1%q/q Q4 (1.0%y/y)	+0.2%q/q Q4 (1.2%y/y)	0.7% Q4 Annualised
Inflation	3.0%y/y (Feb)	1.9%y/y (Feb)	2.4%y/y (Feb)
Unemployment Rate	5.2% (Jan)	6.2% (Jan)	4.4% (Feb)

The Bank of England sprung no surprises in their March meeting, leaving Bank Rate unchanged at 3.75% by a vote of 9-0, but suggesting rates may need to rise if inflation picks up markedly. The MPC stated it “stands ready to act as necessary” and is “alert to the increased risk of domestic inflationary pressures through second-round effects in wage and price-setting”. It is suspected that the committee is likely to put equal weight on higher inflation and weaker growth, particularly the poor macroeconomic backdrop prior to the energy shock, keeping interest rates at 3.75% this year.

10-year Gilt yields have been exceptionally volatile in the final weeks of 205/26, troughing at around 4.23% in late February before shooting up to 5.00% (and well through that on an intraday basis). That spike was driven by the outbreak of war in the Middle East, which prompted a dramatic reassessment of investors’ Bank of England policy rate expectations. Having been pricing in rate cuts in late February , as many as four rate *hikes* were discounted by late-March. The 10-year yield ended the quarter at 4.92% with around 65bp of rate hikes priced in over the coming year. In addition to more hawkish monetary policy expectations, part of this increase in yields probably reflected an increase in term premia amid concerns that the government may react by loosening the fiscal purse strings.

As for equity markets, the FTSE 100 experienced another volatile quarter, surging to an all-time high of around 10,900 in late February, leaving it up 10% from the start of 2026, before giving back most of those gains in March after the outbreak of the Middle East conflict. That pullback leaves the index at around 10,176 at the end of the quarter. For context it was at 8,582 at the start of April. The £ has stayed relatively resilient also at $1.33, strengthening from $1.29 back in April.

USA Economy

Despite a weak finish to 2025, the US economy has generally been the strongest among the developed economies, but with uncertainties growing surrounding President Trump's central economic tenet of being able to apply tariffs on an ad-hoc basis and bend the FOMC Fed Funds rate decision-making to his will, there is something of a stalemate in place at present over when, and if, rates will be cut further in 2026.

Inflation is currently stuck at around 2.5%, unemployment is only a little above 4%, and tax refunds are in the process of being facilitated for many households. But will those refunds be – at least partially – offset by higher gasoline prices?

The S&P500 started April 2025 at 5,633 and finished March 2026 at 6,528 having peaked at just over 7,000. The 10-year Treasury yield finished March at 4.30% having been 4.17% back at the start of April, and during the year has been both above 4.50% and below 4.00%.

EZ Economy

The Eurozone economy has run pretty much in parallel with that of the UK. A slightly stronger finish to 2025 (GDP of 0.2% q/q) than that of the UK cannot hide the fact that the economy has been negatively impacted by German economic stagnation until late in 2025. France has also struggled against a difficult political backdrop but managed to post GDP growth of 0.3% q/q for October to December.

With Eurozone headline inflation close to 2%, the ECB has been able to reduce its Deposit Rate to 2%. Whether it rises from that low point will very much be driven by how energy prices trend over the coming months. The Euro has appreciated against the dollar from 1.08 at the start of April 2025 to 1.16 at the end of March.

APPENDIX 2 - Investments as at 31 March 2026:

Treasury Investments	Principal £	Fixed Start Date	Fixed End Date	Rate
Bank of Scotland (Lloyds)	4,000,000	N/A	N/A	3.51%
Barclays FIBCA	560,000	N/A	N/A	3.25%
Handlesbanken	1,260,000	N/A	N/A	3.40%
LGIM Sterling MMF	2,710,000	N/A	N/A	3.95%
Total Liquid Accounts	**8,530,000**			
Other Treasury Investments	**-**			
Total Treasury Investments	**8,530,000**			

APPENDIX 3 - Borrowing as at 31 March 2026:

Start Date	End Date	Value £	Institution	Rate %	Term
26.03.26	26.06.26	£ 7,000,000	Middlesbrough Teeside Pension Fund	3.51	3 months
19.03.26	19.03.27	£ 28,000,000	Public Works Loan Board	3.51	12 Months
31.03.26	05.01.27	£ 5,000,000	West Midlands Combined Authority	3.51	9 months
Total Short Term		**£ 40,000,000**			
Total Long Term		**£ 0**			
Total Borrowing		**£ 40,000,000**			

APPENDIX 4: Prudential Indicators

PRUDENTIAL INDICATOR	2024/2025 Actual £000's	2025/2026 Actual £000's
Capital Expenditure	36,657	39,651
Ratio of financing costs to net revenue stream	0.96%	-3.79%
Net borrowing		
Brought forward 1 April	15,000	38,500
Carried forward 31 March	38,500	40,000
Change in year - increase/(decrease)	23,500	1,500
Net Investment		
Brought forward 1 April	(7,500)	(17,015)
Carried forward 31 March	(17,015)	(8,530)
Change in year - increase/(decrease)	9,515	(8,485

Capital Financing Requirement

The Council's underlying need to borrow for capital expenditure is termed the Capital Financing Requirement (CFR). This figure is a gauge of the Council's debt position. The CFR results from the capital activity of the Council and what resources have been used to pay for the capital spend. It represents the 2025/2026 unfinanced capital expenditure, and prior years' net unfinanced capital expenditure which has not yet been paid for by revenue or other resources.

CFR (£m): General Fund	31 March 2024/2025 Actual £'000	31 March 2025/2026 Actual £'000
Opening Balance	65,379	83,431
Add unfinanced capital expenditure (as above 4.2)	20,431	18,641
Less MPR/VRP	(2,379)	(2,124)
Closing Balance	**83,431**	**99,948**

Net borrowing and the CFR

In order to ensure that borrowing levels are prudent over the medium term the Council's external borrowing, net of investments, must only be for a capital purpose. This essentially means that the Council is not borrowing to support revenue expenditure. Net borrowing should not therefore, except in the short term, have exceeded the CFR for 202/2026. This essentially means that the Council is not borrowing to support revenue expenditure. The table below highlights the Council's net borrowing position against the CFR. The Council has complied with this prudential indicator.

CFR	31 March 2025 Actual £'000	31 March 2026 Actual £'000
Borrowing	38,500	40,000
Investments	(17,015)	(8,530)
Net Position	**21,485**	**31,470**
Closing CFR	**83,431**	**99,948**

Actual financing costs as a proportion of net revenue stream

This indicator identifies the trend in the cost of capital (borrowing and other long-term obligation costs net of investment income) against the net revenue stream (Council Tax and Government Grant).

	2025/2026 £'000
Authorised limit	94,000
Maximum gross borrowing position during the year	45,000
Operational boundary	84,000
Average gross borrowing position	32,790
Financing costs as a proportion of net revenue stream	3.79%

TREASURY MANAGEMENT PRUDENTIAL INDICATORS	2024/2025 £'000	2025/2026 £'000
Authorised limit for external debt -		
Borrowing	72,000	94,000
Operational boundary for external debt -		
Borrowing	67,000	84,000
Upper limit for fixed interest rate exposure (100%)		
Net principal re fixed rate borrowing /investments	72,000	94,000
Upper limit for variable rate exposure (40%)		
Net principal re variable rate borrowing / investments	28,800	37,600

Maturity structure of fixed rate borrowing during 2025/2026	upper limit	lower limit	Actual
under 12 months	100%	0%	100%
12 months and within 24 months	100%	0%	0%
24 months and within 5 years	100%	0%	0%
5 years and within 10 years	100%	0%	0%
10 years and above	100%	0%	0%

POLICY REVIEW AND DEVELOPMENT PANEL REPORT

REPORT TO:	Audit Committee		
DATE:	14 September 2026		
TITLE:	Anti-Fraud and Anti-Corruption Framework Update		
TYPE OF REPORT:	Update		
PORTFOLIO(S):	Cllr Chris Morley – Portfolio Holder - Finance		
REPORT AUTHOR:	Carl Holland – Assistant Director – Finance (Deputy S.151)		
OPEN/EXEMPT	Open	WILL BE SUBJECT TO A FUTURE CABINET REPORT:	*No*

REPORT SUMMARY/COVER PAGE

PURPOSE OF REPORT/SUMMARY:
This is a policy review which is to update the previous Anti-Fraud & Anti Corruption Policy which was formally approved on 6th February 2024. The Council's Counter Fraud and Anti-money laundering policies has been reviewed to amend titles and roles within the policy due to personnel changes and confirm the policy remains up to date with legislation. The Framework includes details of controls and anti-fraud and anti-corruption activities undertaken across the organisation, including by Financial Services and Procurement. Under this framework is a suite of procedures.
KEY ISSUES:
The Council holds extensive policy in response to the need to prevent and detect fraud and corruption. This report introduces an overarching Framework document, to draw attention the many related policies. The report also provide an updated Strategy that follows a review of Services processes for mitigating and detecting fraud and corruption. The Framework has been updated to include the "Failure to Prevent Fraud" offence introduced by the Economic Crime and Corporate Transparency Act 2023. The duty reinforces features of the councils already adopted Policy Framework for countering fraud and corruption. As a result, changes only relate to post title, role update and reference to the new Act.
OPTIONS CONSIDERED:
The policies have been updated and given such extensive supporting policies it is recommended that training is delivered to the Members and the workforce to ensure continued awareness.

Continued awareness is enforced through Assurance Mapping by services. Revisions to the policy framework indicate that officers should be able to demonstrate their awareness of the risk of fraud and corruption. Training will therefore re-iterate evidence of risk awareness and mitigations within service level risk registers.
RECOMMENDATIONS:
Recommend adoption of this framework and agreement to receive a year end update in support of the Anti-Fraud and Corruption Strategy.
REASONS FOR RECOMMENDATIONS:
Protecting public money is fundamental to good governance. This updated Framework strengthens the Council’s arrangements for preventing, detecting and investigating fraud and corruption across the organisation.

REPORT DETAIL

1. Review Report

1.1 Counter Fraud Framework – This is new and provides a summary of the policies and procedures that relate to the Council's approach to Fraud prevention, control and detection. (Appendix 1)

1.2 Anti- Money Laundering Policy - Has been updated to reflect changes in post and role titles and introduces consideration of "know your customer" and "customer due diligence". (Appendix 2)

1.3 Anti-bribery Policy – Updated to include proactive diligence in response to the "Failure to Prevent Offence". (Appendix 3)

1.4 Anti-Fraud and Corruption Policy - Now updated to include a requirement to seek evidence of commitment by bidders to anti-fraud and corruption by potential suppliers (para 9.2). (Appendix 4)

1.5 Anti-Fraud and Anti-Corruption Strategy – Provides an assessment of Council Services' compliance and mitigation processes. (Appendix 5)

2. Issues for the Panel to Consider

2.1 The Home Office has published final guidance on the new **Failure to Prevent Fraud** offence introduced by the Economic Crime and Corporate Transparency Act 2023. The offence came into force on **1 September 2025** and is designed to make it easier to hold organisations to account where an employee, agent, subsidiary or other associated person commits fraud intended to benefit the organisation (or, in some circumstances, its clients). Crucially, an organisation may be liable even where senior managers were unaware of the fraud, unless it can demonstrate that it had **reasonable fraud prevention procedures** in place.

2.2 Public sector bodies are expected to align existing counter-fraud arrangements with the new requirements and consider whether current fraud risk assessments and controls adequately address the risks covered by the legislation.

2.3 **Economic Crime and Corporate Transparency Act 2023 (ECCTA)**, **Key points**

2.3.1 **Statutory Inclusions:** As a large public sector organization (exceeding 250 employees and a £36 million annual budget), the Borough Council falls within the scope of the Act.

2.3.2 **The Strict Corporate Offence:** Since 1 September 2025, relevant bodies face strict corporate criminal liability and unlimited financial penalties if an "associated person" (employees, contractors, councillors, or agents) commits fraud intending to benefit the Council.

2.3.3 **The Only Legal Defence:** The Council has a complete defence only if it can explicitly prove it has "reasonable fraud prevention procedures" actively in place.

2.3.4 The Act reinforces the need for:

- Strong governance and oversight of the Council's counter-fraud framework.
- Regular fraud risk assessments linked to internal audit findings and emerging risks.
- Clear accountability for fraud prevention activities.
- Effective whistleblowing, investigation and reporting arrangements.
- Periodic review of fraud policies, training and awareness programmes.

2.4 The Anti-Fraud and Anti-Corruption Strategy provides assurance that appropriate mitigating measures are in place, but supports that regular review is necessary, in light of continuing and emerging threats. The document demonstrates a strong position for complying with ECCTA above. The Audit Committee are advised to seek a year end update providing assurance of continued good practice and response to emerging threats and risks from fraud and corruption.

3. Corporate Priorities

The Framework supports the Councils priority to provide “Efficient and effective delivery of our services”, through the aim of protecting funds.

4. Financial Implications

The Framework helps to mitigate the risk to the organisation against fraud and corruption which financially affects the council.

5. Any other Implications/Risks

Failure to have and maintain a policy would leave the council susceptible to fraud and corruption and financial losses from both internal and external threats. The Economic Crime & Transparency Bill which received Royal Assent in October 2023 also introduces new corporate offences for “failing to prevent fraud” and not having “reasonable fraud prevention procedures”.

6. Equal Opportunity Considerations

The Anti-Fraud and Anti-Corruption Policies set out the intention to protect public funds and ensure that funds are used effectively and lawfully.

7. Environmental Considerations

Whistle-blowers may report environmental impact concerns. Some environmental impacts can relate to financial fraud and corruption.

8. Consultation

The Policies already exist on the Council’s website, this is a refresh and introduction of an umbrella Framework document. The report is with Audit Committee for feedback. The Council’s Finance, Internal Audit and Policy Teams have reviewed the Framework Documents.

9. Conclusion

The Policy documents are extensive and benefit from a summarised Framework document. Th latest related legislation has been incorporated and officers titles and roles brought up to date. Refresher training will draw awareness to individual responsibilities and evidence the management of the risk of fraud and corruption.

10. Background Papers

Economic Crime and Corporate Transparency Act 2023: Guidance to organisations on the offence of failure to prevent fraud

Council's Website for "Counter Fraud" Counter fraud, bribery and money laundering | Counter fraud, bribery and money laundering | Borough Council of King's Lynn & West Norfolk

The Council's Website pages for "Whistleblowing"
Introduction | Whistleblowing | Borough Council of King's Lynn & West Norfolk

11. Appendices
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Counter Fraud and Corruption Framework

1. Purpose

This Framework sets out how the Council prevents, detects, responds to, and learns from fraud, bribery, and corruption. It links high-level strategy to operational policies, procedures, and tools.

2. What the Framework includes

- Anti-Bribery Policy – covers gifts, gratuities and hospitality.
- Anti-Fraud and Anti-Corruption Policy - This policy details the Council's arrangements for managing the risk of fraud and corruption.
- Anti-money laundering - This policy outlines our approach to preventing and detecting money laundering activities within our jurisdiction.
- Anti-Fraud and Corruption Strategy – considers measures in peace to prevent and detect the risk of fraud and corruption and re-enforces the need for continuous risk assessment and awareness training.

This Framework signposts those documents rather than repeating their content.

3. Scope and definitions

This applies to members, employees (including contractors and volunteers), suppliers, and partners undertaking Council business. Covers internal and external fraud, bribery, corruption, attempted and suspected cases, and related conduct risks (e.g., conflicts of interest, gifts and hospitality, procurement risk, money laundering).

4. Principles

- Zero tolerance with proportionate, risk-based controls.
- Three Lines Model (management; risk/compliance/internal audit; Audit Committee).
- Clear accountability and escalation, with protection for whistleblowers.
- SSOT discipline to prevent policy drift and duplicated rules.

5. Legal, standards, and external interfaces (signposts)

- Fraud Act 2006
- Bribery Act 2010
- Proceeds of Crime Act 2002
- Economic Crime and Corporate Transparency Act 2023
- Criminal Finances Act 2017
- Money Laundering Regulations 2017 (as amended)
- public procurement law and Contract Standing Orders (CSOs)
- Government Functional Standard GovS 013
- Fighting Fraud and Corruption Locally (FFCL)

- National Fraud Initiative (NFI).

Standards and compliance statements

- We self-assess annually against CIPFA's Code of Practice and GovS 013; identified gaps and actions are reported to Audit Committee.
- We align to central government counter-fraud disciplines (fraud risk assessment, prevention, detection, culture, investigation).

6. Governance and roles (Three Lines)

This section sets out who is accountable for preventing, detecting and responding to fraud and corruption, and how this Framework connects to the detailed documents that hold the operational rules. It exists to make responsibilities clear and to avoid rewriting the same content in multiple places.

Oversight

- Full Council and Cabinet set tone and resources.
- The Audit Committee provides independent oversight, receives plans and progress updates, and challenges where necessary.
- The Chief Executive leads the culture and expected standards.

Management and control

- The Section 151 Officer is responsible for the system of internal control and for ensuring appropriate resourcing.
- The Monitoring Officer oversees standards and the Members' gifts and hospitality regime.
- Service Directors and managers embed controls in everyday processes, maintain local registers, and ensure staff complete induction and refresher learning.
- The Procurement team applies supplier due diligence and exclusion grounds in line with Contract Standing Orders and the Procurement Strategy.
- The Corporate Governance team maintains the central Gifts and Hospitality Register and coordinates the policy suite.
- The nominated Money Laundering Reporting Officer operates the anti-money laundering regime and records decisions in line with the AML Procedures.
- HR manage pre-employment screening, conduct and disciplinary processes, and awareness.
- ICT manage access controls, monitoring and incident response interfaces.

Risk, compliance and independent assurance

- Internal Audit provides independent assurance and, where appropriate, supports investigations in line with the Anti-Fraud and Anti-Corruption Policy.
- External interfaces include the police, insurers, the National Fraud Initiative, external audit and relevant regulators.

7. Fraud Risk Assessment (FRA) method

The council uses a single, repeatable method to identify, prioritise and treat fraud and corruption risks. The aim is to focus attention and resources on the areas of greatest exposure.

- **Coverage:** procurement and commissioning; payroll and expenses; revenues and benefits; housing and tenancy; social care direct payments; council tax and business rates; grants; assets; purchasing cards; conflicts of interest; gifts and hospitality; cyber-enabled fraud; insider threat; exposure to money laundering.
- **Scoring:** inherent likelihood and impact; effectiveness of controls; residual risk; target risk and actions.
- **Cadence:** refreshed annually and on triggers such as service change, new programmes or material control failures.
- **Use:** outputs feed the corporate risk register and shape the Annual Counter Fraud Plan.

8. Prevention (controls and culture)

Prevention reduces opportunity and sets clear expectations for conduct. Controls are proportionate to risk and are kept under review.

- **People and conduct:** proportionate pre-employment screening; clear standards; annual declarations for higher-risk posts.
- **Gifts and hospitality:** rules set by the Anti-Bribery Policy; all offers and decisions recorded using the Gifts and Hospitality Form.
- **Commercial safeguards:** supplier due diligence, conflict checks and exclusion grounds in line with Contract Standing Orders and the Procurement Strategy.
- **Financial and system controls:** segregation of duties; maker–checker arrangements; monitoring of journals and overrides; periodic access reviews.
- **Information:** privacy by design; secure investigation records with legal hold where required.
- **Awareness:** mandatory induction and proportionate refreshers, with targeted sessions for higher-risk roles.

9. Detection (data, signals, reporting)

Detection combines the intelligent use of data with clear reporting routes and external matching.

- **Analytics and exceptions:** focused exception reporting across payroll, purchasing cards, creditors, grants and tenancy.
- **External matching:** planned participation in the National Fraud Initiative and risk-based follow-up of matches.
- **Speak-up routes:** confidential reporting under the Whistleblowing Policy, with clear response standards.

- **Anti-money laundering triggers:** red flags and customer due diligence steps as set out in the AML Procedures.
- **Manager attestations:** periodic confirmations and register checks to surface issues between audits.

Fraud measurement and benefits realisation

Where proportionate and meaningful, the council records values prevented, detected and recovered, and captures lessons learned so that controls can be strengthened. The purpose is organisational learning and assurance rather than target-setting.

10. Reporting and escalation (signposted)

The aim is to get concerns to the right place quickly and to contain risk.

- Suspected fraud, bribery or corruption should be reported through the Whistleblowing route.
- Suspicion of money laundering should be reported to the Money Laundering Reporting Officer using the Employee Suspicious Activity Report set out in the AML Procedures.
- Immediate containment actions, notifications and the sequence of steps are set out in the Fraud Response Plan.
- Serious incidents are escalated to the Section 151 Officer and the Monitoring Officer.
- Communications with the media follow the Anti-Fraud and Anti-Corruption Policy.

11. Investigation and case management (signposted)

Investigations are conducted lawfully, fairly and consistently. The detailed approach to triage, securing and preserving evidence, conducting interviews, liaising with the police and insurers, and handling communications is defined in the Anti-Fraud and Anti-Corruption Policy. Staff should not comment publicly or handle evidence outside those procedures.

12. Sanctions, recovery, and redress

The council considers civil, criminal and disciplinary routes case by case. Recovery options include contractual remedies, set off and civil recovery. Where appropriate, recovery under proceeds of crime legislation may be pursued through accredited partners. Supplier sanctions can include exclusion under Contract Standing Orders and the Procurement Strategy and, where justified, termination following legal advice.

13. Information governance and data sharing

Data is shared only under appropriate gateways, such as the National Fraud Initiative, requests under section 29 of the Data Protection Act, or where there is a clear public task or legitimate interest. Investigation records are kept confidential and access is limited to those who need to know. Where required, a legal hold is applied.

All anti-money laundering records are retained in line with Section 4 of the AML Procedures, and the forms used in that regime state that retention rule.

14. Training and awareness

The Council promotes a strong counter-fraud culture through awareness, training and clear communication. Members, employees, contractors and partners are expected to understand their responsibilities in preventing, identifying and reporting fraud and corruption.

The Council will provide appropriate counter-fraud training and maintain accessible policies and reporting arrangements. Internal Audit will monitor emerging fraud risks, maintain investigative expertise and support the ongoing development of fraud prevention, awareness and response activities across the Council and its associated organisations.

15. Annual Counter Fraud Plan

The Annual Counter Fraud Plan converts the fraud risk assessment into a set of resourced actions across prevention, analytics, National Fraud Initiative work, thematic reviews and training. The Audit Committee approves the plan and receives progress reports during the year. A concise public summary may be produced where that would help transparency.

16. Review and version control

Owner: Deputy Chief Executive - S151 Officer (sponsor) and Assistant Director Finance - Deputy S151 (custodian).
Review: annually or on material change.

Borough Council of
King's Lynn &
West Norfolk

ANTI-MONEY LAUNDERING POLICY

September 2026

CONTENTS

1. Policy Statement

1.1 The Borough Council of King’s Lynn & West Norfolk (the Council) is committed to upholding the highest standards of integrity and ethics in all its activities. As part of our ongoing commitment to combat financial crime, including money laundering and terrorist financing, we have developed this Anti-Money Laundering (AML) Policy. This policy outlines our approach to preventing and detecting money laundering activities within our jurisdiction.

2. Purpose

2.1 Regulated Authorities must have provisions in place relating to Money Laundering, as a Local Authority we are not legally obliged to apply the provisions of the Money Laundering Regulations 2007. However, the purpose of this policy is to employ policy and procedures which reflect the essence of the UK’s anti-terrorist financing, anti-money laundering and other anti-financial crime regimes. Guidance from the Chartered Institute of Public Finance and Accountancy (“CIPFA”) indicates Local Authorities should comply with the legislation and regulations by:

a) Adhering to the spirit of the legal obligations and regulatory requirements set forth by the United Kingdom's Money Laundering Regulations and other relevant legislation.

b) Establishing clear guidelines and procedures to prevent money laundering activities across the Council (including its Local Authority Trading Companies (LATCs).

c) Promoting awareness and provide training to our employees and relevant stakeholders to identify and report suspicious activities.

d) Maintaining the integrity and reputation of the Council by demonstrating our commitment to combat financial crime.

3. Scope

3.1 This policy (and its accompanying set of procedures) applies to the Borough Council of King’s Lynn & West Norfolk, and therefore applies to Members and all employees of the Council, including temporary and agency staff as well as those employed in wholly owned entities of the Council. It contains specific sections to advise employees and Members of the process to be followed to enable the Council to comply in essence with the UK's anti-terrorist financing, and anti-money laundering regimes.

3.2 This policy ensures all appropriate action is taken to prevent, wherever possible, employees, Members, and the Council from being exposed to money laundering and to comply with all legal and regulatory obligations, including the reporting of suspected or actual cases in line with disclosure requirements.

4 What is Money Laundering?

4.1 The Consultative Committee of Accountancy Bodies (CCAB) states that money laundering "includes all forms of using or possessing criminal property (as well as facilitating the use or possession) regardless of how it was obtained", where criminal property includes:

- Money or money's worth.
- Securities.
- A reduction in a liability.
- Tangible or intangible property.

4.2 Money laundering involves "the proceeds of offending in the UK but also conduct overseas that would have been an offence had it taken place in the UK. There is no need for the proceeds to pass through the UK". This can include the following activities:

- A single act (for example, possessing the proceeds of one's own crime).
- Complex and sophisticated schemes involving multiple parties.
- Multiple methods of handling and transferring criminal property.
- Concealing criminal property or entering into arrangements to assist others to conceal criminal property.

4.3 Money Laundering is the process of moving illegally acquired cash through financial systems so that it appears to come from a legitimate source. Criminals will try to conceal the origin and true ownership of the proceeds of their activities to turn the money from "dirty" to "clean". It is therefore important that businesses, even low risk ones, have procedures and policies in place to identify and prevent money laundering within their company. Money laundering is the term used to describe several offences involving the proceeds of crime or terrorist funds. It is a criminal offence to:

- Conceal, disguise, convert, transfer, or remove criminal property from the United Kingdom.
- Enter into or become concerned in an arrangement which an individual knows, or suspects facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person.
- Acquire, use, or possess criminal property.
- Fail to disclose one of the principal offences listed above, where there are reasonable grounds for knowing or suspecting the money was a proceed of crime.
- Tell someone that you are going to make a report or tell someone that they are being investigated (tipping-off).
- Falsify, destroy, dispose of, conceal any document which is relevant to an investigation, or allow this to happen.

4.4 There are three stages of money laundering:

1. **Placement**: Following the commission of a crime, the funds derived from the crime are paid into a bank account or used to purchase an asset, for example property.
2. **Layering**: In order to disguise the source of the proceeds of crime, criminals conduct complex and frequent transactions. Using ‘money mules’ is a form of layering and is an increasing trend in the UK. Money muling occurs when an individual receives money into their bank account (wittingly or unwittingly from a criminal) and transfers it elsewhere. The individual is often promised that they can keep a portion of the cash for facilitating this transaction.
3. **Integration**: Following the layering stage, i.e., once the source of the criminal funds are well disguised, the funds are transferred into the financial system. Therefore, the money appears normal. For example, criminals commonly sell property to integrate laundered money back into the economy.

4.5 Often linked to money laundering is terrorist financing, which is where money is used to finance acts of terrorism.

5. Relevant Legislation and Regulations

5.1 The main pieces of legislation that the Council need to be aware of are:

- Proceeds of Crime Act 2002 (POCA)
- Terrorism Act 2000
- The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 as amended by the Money Laundering and Terrorist Financing (Amendment) Regulations 2019, and the Money Laundering and Terrorist Financing (Amendment) (No.2) 2022 Regulations.

5.2 Other relevant legislation includes the Criminal Finances Act 2017, Terrorist Asset-Freezing Act 2010, Anti-terrorism, Crime and Security Act 2001, Counter Terrorism Act 2008 - Schedule 7, and the Economic Crime (Transparency and Enforcement) Act 2022.

5.3 POCA applies to everyone, but certain issues related to money laundering only apply to those engaged in activities in the "regulated sector". Organisations who fall within the "regulated sector" are required to put in place certain anti-money laundering policies, controls, and procedures to anticipate and prevent their businesses being used by criminals to launder money and fund terrorism as well as ensure that the ownership and control of any company, legal arrangement or trust structure of a customer is identified and verified.

5.4 As the 2019 Regulations prescribe mandatory enhanced due diligence measures when a transaction appears to be "high risk", this policy includes wording to cover these situations, even though the Council is a non-regulated organisation and therefore considered "low risk", this has been done as a matter of good practice. If enhanced due diligence is required, customers may wish to seek independent specialist legal advice due to the serious civil and criminal penalties that can result from failure to comply.

5.5 The Money Laundering and Terrorist Financing (Amendment) (No.2) 2022 Regulations require businesses subject to the MLRs (*as a local authority we are not regulated by the MLR*) to conduct checks of the Register of Overseas Entities (ROE) at Companies House for dealings with corporate entities and limits the matters that must be reported to "material" discrepancies that may reasonably be considered;

i) to be linked to money laundering or terrorist financing or

ii) to conceal details of the business of the customer.

5.6 The above legislation and regulations cover a range of activities and offences relating to money laundering. Further details are provided in the **Anti-Money Laundering Procedures Appendix 1: Offences Table**.

5.7 These offences cover a range of activities, which do not necessarily need to involve money or laundering, regarding the proceeds of crime. This means that potentially any employee or Member, irrespective of what sort of Council business they are undertaking, could commit an offence if they become aware of, or suspect the existence of criminal property, irrespective of the size of the benefit gained, and/or fail to report their concerns.

5.8 Where an employee/Member suspects money laundering and reports or are aware that someone else has reported the matter, they must exercise caution in what is discussed with others as a further offence of “tipping off” may be committed if, knowing or suspecting a disclosure has been made, the employee/Member take any action which is likely to prejudice any investigation that may be conducted.

5.9 It is impossible to give a definitive list of ways in which to spot money laundering or how to decide whether to make a report. Facts which tend to suggest that something ‘odd’ is happening may be sufficient for a reasonable suspicion of money laundering to arise. Risk factors which may, either alone or cumulatively with other factors, suggest the possibility of money laundering activity are provided at **Appendix 2: Possible Signs of Money Laundering of the Anti-Money Laundering Procedures**.

5.10 Potentially any employee or Member could be caught by the money laundering provisions if they suspect money laundering and either become involved with it in some way and/or do nothing about it, then they may be liable to prosecution. Heavy penalties, including unlimited fines and up to 14 years imprisonment, can be handed down to those who are convicted of one of the offences listed above.

6. Requirements of the Money Laundering Legislation

6.1 The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 impose specific obligations on “relevant persons”.

6.2 The term relevant person relates to the following activities carried out in the course of business; tax advice; accounting services; treasury management; investment or other financial services; credit institutions; audit services; legal services; estate agents; services involving the formation, operation or arrangement of a company or trust; dealing in goods wherever a transaction involves a cash payment equivalent to €15,000 (£12,000) or more.

6.3 Some activities undertaken by local authorities could be included within the scope of the money laundering regulations. Therefore, to ensure compliance with the regulations and legislation and for the purposes of this Policy and procedures, the Council are considered a relevant person when acting in the course of business and activities carried on by them.

6.4 The obligations include the following requirements:

- Appoint a Money Laundering Reporting Officer (MLRO) responsible for receiving internal disclosures and making external disclosures of suspicious money laundering activities to the National Crime Agency (NCA). These disclosures are submitted in the form of a suspicious activity report (SAR).
- Conduct a risk assessment on money laundering and terrorist financing.
- Implement policies, procedures, systems, and controls to counter money laundering and terrorist financing risks. This includes putting in place customer due diligence (CDD), and if necessary, enhanced due diligence procedures.
- Provide training on money laundering and terrorist financing to staff.
- Establish beneficial ownership of clients i.e., to understand their ownership and structure. Obtaining sufficient knowledge to ascertain the true identity of customers in certain circumstances, by applying due diligence measures.

- Know the intended nature of business relationships and undertake ongoing monitoring of them (to identify unusual transactions).
- Implement a procedure for assessing and controlling risk and reporting suspicions of money laundering.
- A requirement to report to Companies House any discrepancies about a client's company information.
- A requirement to respond to information requests about accounts and safe-deposit boxes.
- Maintain record keeping procedures of all the due diligence undertaken (e.g., for evidence of identity obtained, details of transactions undertaken, for at least 5 years).

6.5 UK anti-money laundering legislation requires organisations to adopt a risk-based approach to managing money laundering risks. This includes assessing, documenting and regularly reviewing the Council's exposure to money laundering risks, and ensuring that appropriate controls are in place to mitigate those risks. As such Assistant Directors/Service Managers should maintain engagement with Internal Audit as business operations change regarding undertaking appropriate and proportionate assessments.

7. Roles and Responsibilities

7.1 Everyone at the Council falls within scope of this policy and has a role in implementing it. Four post holders, however, have, formal responsibilities in respect of the policy:

Role	Post Holder	Summary of Responsibilities
Nominated Officer for Compliance (NOC)	Deputy Chief Executive, (Section 151 Officer)	Overall responsibility for ensuring the Council complies with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and supervising its AML function.
Money Laundering Reporting Officer (MLRO)	Assistant Director Finance (Deputy Section 151 Officer)	Ensuring and reviewing the efficacy of this policy and promoting the compliance of all staff and members with it. Ensuring there are mechanisms to facilitate the

		reporting of any suspicions that money laundering may be taking place, receiving, and investigating any such reports and in turn making reports to the National Crime Agency (NCA). Working with the Council's Senior Leadership Team, identifying teams within the Council that are making loans, and recoverable grants.
Deputy Money Laundering Reporting Officer (DMLRO)	Legal Services Manager & Deputy Monitoring Officer	Supporting and deputising for the MLRO.
Officer in Charge of Keeping Records (OCKR)	Assistant Director Finance (Deputy Section 151 Officer)	Ensuring arrangements are in place to store and retain due diligence and other AML documentation.

7.2 The council has a commitment to combating serious organised crime groups and safeguarding the well-being of our staff and members. We acknowledge the critical role of identifying and reporting suspicious activities that may be linked to money laundering and other illicit financial practices.

7.3 We will collaborate with law enforcement agencies, particularly the local police and the National Crime Agency, in addressing the threats posed by serious organised crime groups. We recognise the vital importance of fostering robust partnerships to effectively combat these criminal networks.

7.4 Furthermore, we assure all staff and members that their safety and security are of paramount importance to us. We are fully dedicated to providing the necessary support and protection to those who report suspicious activities.

8 Penalties and Defences

8.1 Operational steps, timings and communication protocols (including NCA consent / moratorium and tipping-off safeguards) are set out in the Anti-Money Procedures Section 3

10 Sanctions List

10.1 There is a separate but related sanctions regime that imposes restrictions on our ability to do business with those persons and entities on HM Treasury's sanctions list.

10.2 Some entries on the list are specific to a particular person or entity and others are general financial sanctions on all persons and entities in a particular jurisdiction. Sometimes the effect of the sanction is that we should never provide a loan, recoverable grant or conduct other financial transactions to those on the list. In other cases, it may be possible to proceed provided we obtain a licence granted by HM Treasury. Breaching the sanctions regimes would have serious consequences for the Council and for you as an individual. So, the analysis of sanctions risk must be an integral part of the due diligence we undertake at the outset of any loan or recoverable grant transaction. A sanctions search is part of our "Knowing Your Customer" (KYC) requirements.

11 Review

11.1 The Council will continue to review its rules and procedures and will make sure that the Anti-Money Laundering Policy is regularly reviewed to ensure it stays current, appropriate, and effective.

12 Version Control

Policy name		Anti-Money Laundering Policy
Policy description		Regulated Authorities must have provisions in place relating to Money Laundering, as a Local Authority we are not legally obliged to apply the provisions of the Money Laundering Regulations 2007. However, as a responsible public body, the Borough Council of King's Lynn & West Norfolk who do not undertake any such regulated activities should employ policies and procedures which reflect the essence of the UK's anti-terrorist financing, and anti-money laundering regimes. Such legislation has been considered by professional bodies, resulting in best practice Guidance being issued that requires local authorities to establish internal procedures to prevent the use of their services for money laundering. Where operational detail in this Policy conflicts with the AML Procedures, the AML Procedures prevail.

Responsible Officer		Assistant Director Finance (Deputy Section 151 Officer)		
Version number	Date formally approved	Reason for update	Author	Review date
1.1	30/06/20	To introduce a corporate anti-money laundering policy	Senior Internal Auditor	April 2022
1.2	05/03/25	To amend titles and officers with roles within the policy due to changes in personnel.	Senior Internal Auditor	August 2022
2.1		To amend titles and officers with roles within the policy. To further develop the policy to include more robust details and information regarding CDD and KYC within an accompanying set of procedures to assist officers should the need arise to follow this process through providing a step-by-step guide.	Assistant Director – Finance (Deputy Section 151 Officer)	September 2026

Borough Council of
King's Lynn &
West Norfolk

ANTI-BRIBERY POLICY

March 2025

1. Introduction

1.1. The Borough Council of King's Lynn & West Norfolk is committed to upholding the highest standards of integrity, transparency, and accountability. We adopt a zero-tolerance approach to bribery and corruption and are fully committed to ensuring compliance with the Bribery Act 2010 and other relevant UK legislation.

1.2. This policy provides clear guidance to all employees, elected members, suppliers, contractors, and any individuals or organisations acting on behalf of the Council, setting out our commitment to preventing and addressing bribery in all its forms.

2. Scope and Applicability

2.1. This policy applies to:

- ✓ All council employees (including volunteers, temporary staff and agency staff)
- ✓ Elected members
- ✓ Staff and committee members of council funded voluntary organisations
- ✓ Council partners
- ✓ Wholly owned local authority trading companies
- ✓ Council suppliers, contractors and consultants (whether engaged directly or indirectly through partnership working) - the council's template contractual terms set out the main principles which the council expects all suppliers to comply with - the council expects its suppliers throughout the supply chain to support the principles contained in the code of conduct, and to actively communicate and promote the principles to their own supply chains

2.2. Compliance with this policy is mandatory, and failure to adhere may result in disciplinary action, exclusion from contracts, and potential legal consequences.

3. Legal Framework

3.1 This policy is underpinned by the Bribery Act 2010, which defines the following offences:

- ➢ Bribing another person (Section 1) – Offering, promising, or giving a financial or other advantage to induce or reward improper performance.
- ➢ Being bribed (Section 2) – Requesting, agreeing to receive, or accepting a bribe.
- ➢ Bribing a foreign public official (Section 6) – Offering a bribe to influence a public official's actions.
- ➢ Failure to prevent bribery (Section 7) – A commercial organisation failing to prevent bribery by an associated person acting on its behalf.

3.2. Additionally, under the Procurement Act 2023, any supplier convicted of bribery must be excluded from participating in public contracts.

4. Council Commitment

4.1 The Council is committed to:

- ✓ Preventing bribery and corruption in all Council operations.
- ✓ Detecting and reporting any suspected bribery or corrupt activity.
- ✓ Taking disciplinary and legal action against those found engaging in bribery.
- ✓ Ensuring compliance through training, risk assessments, and due diligence.

4.2 Whether the procedures are adequate will ultimately be a matter for the courts to decide on a case-by-case basis. Adequate procedures need to be applied proportionately, based on the level of risk of bribery in the organisation. It is for individual organisations to determine proportionate procedures in the recommended areas of six principles. The principles are not prescriptive and are intended to be flexible and outcome focussed e.g. small organisations will face different challenges to those faced by large multi-national enterprises.

4.3 Proportionate procedures: The council's procedures to prevent bribery by persons associated with it are proportionate to the bribery risks it faces and to the nature, scale and complexity of its activities. They are also clear, practical, accessible, effectively implemented and enforced:

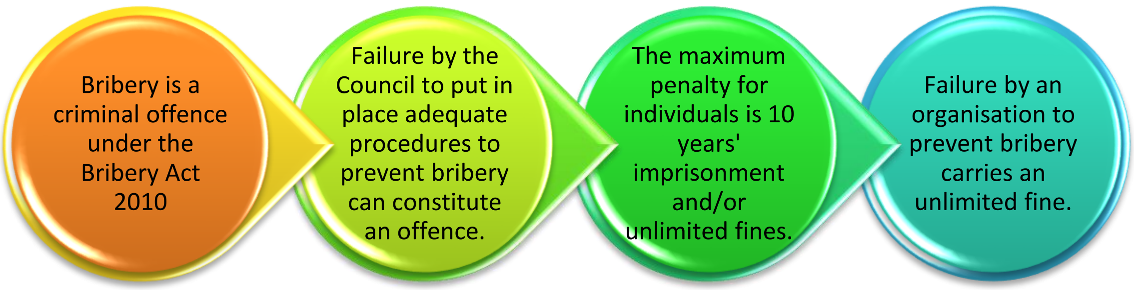
Top level commitment	Elected members and the council's Corporate Leadership Team are committed to preventing bribery by persons associated with the council. They foster a culture within the council in which bribery is never acceptable.
Due diligence	The council applies due diligence procedures, taking a proportionate and risk-based approach in respect of persons who perform or will perform services for or on behalf of the organisation to mitigate identified bribery risks.
Risk Assessment	The council assesses the nature and extent of its exposure to potential external and internal risks of bribery on its behalf by persons associated with it. The assessment is periodic, informed and documented. It includes financial risks but also other risks such as reputational damage.
Communication	The council seeks to ensure that its bribery prevention policies and procedures are embedded and understood throughout the organisation through internal and external communication, including training that is proportionate to the risks it faces.
Monitoring and review	The council monitors and reviews procedures designed to prevent bribery by persons associated with it and makes improvements where necessary.

4.4. The council is committed to proportional implementation of the above principles.

5. What is Bribery?

5.1. Bribery is an inducement or reward offered, promised, or provided to gain personal, commercial, regulatory, or contractual advantage. Examples include:

- Offering a supplier an advantage in procurement in exchange for gifts or favours.
- A contractor giving excessive hospitality to influence a decision.
- A public official soliciting payments in exchange for preferential treatment.



6. Responsibilities

6.1. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the organisation or under its control. All employees are required to avoid activity that breaches this policy.

6.2. As an officer, you must:

- ✓ ensure that you read, understand and comply with this policy
- ✓ raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future

6.3. As well as the possibility of civil and criminal prosecution, employees breaching this policy will face disciplinary action, which could result in dismissal for gross misconduct.

Role	Responsibility
All Employees & Councillors	Avoid involvement in bribery, report concerns, and adhere to this policy.
Managers & Heads of Service	Lead by example, ensure compliance within their teams, and support staff training.
Suppliers & Contractors	Comply with anti-bribery terms in contracts and report any suspected bribery.
Monitoring Officer	Investigate reports of bribery and enforce policy compliance.

7. Gifts and Hospitality

7.1. This policy is not intended to change the requirements of the council's code's of conduct for officers or members. Employees and councillors must not accept gifts or hospitality that could be perceived as influencing decisions. In general terms, an employee or elected member must:

- Treat any offer of a gift or hospitality if it is made to them personally with extreme caution.
- Not receive any reward or fee other than their salary.
- Never accept monetary gifts of any kind.
- Always refuse offers of gifts or services to them (or their family members) from organisations or persons who do, or might, provide work, goods or services, to the council or who require a decision from the council.
- Gifts or hospitality over £25 must be declared and recorded in the Gifts & Hospitality Register.
- Any offer that could be perceived as a bribe must be declined and reported.
- Employees must seek approval before accepting invitations to events.

8. Facilitation payments

8.1 Facilitation payments are not tolerated and are illegal. Facilitation payments are unofficial payments made to public officials to secure or expedite actions.

9. Reporting Bribery

9.1. Report concerns via the whistleblowing route (anonymous options available). If facts indicate bribery, notify the Monitoring officer, if money-laundering is suspected, make an MLRO report (see AML procedures).

9.2. The Council ensures whistleblower protection and a commitment to thoroughly investigating all allegations. Reports may be investigated internally, referred to the police, or reviewed by external auditors.

10. Consequences of Non-Compliance

- Employees engaged in bribery face disciplinary action, including dismissal.
- Suppliers or contractors engaged in bribery will be excluded from future contracts.
- The Council may pursue criminal prosecution of individuals and organisations.

11. Review and Monitoring

11.1. This policy will be reviewed annually to ensure it remains effective and compliant with legal and regulatory updates.

12. Version Control

Policy name	**Anti-bribery Policy**			
Policy description	This policy enables the Council to meet its requirements under the Bribery Act 2010 to ensure that adequate procedures are in place.			
Responsible Officer				
Version number	**Date formally approved**	**Reason for update**	**Author**	**Review date**
1.0		Updated to include proactive diligence in response to the “Failure to Prevent Offence” from ECCTA 2025	Assistant Director - Finance	September 2026

Procedural Guidance

Employees may find it useful to consider the following factors when considering whether the acceptance of a gift, gratuity or hospitality is reasonable:

G GENUINE

- Is the offer made for genuine reasons without encouragement and with no potential for a reasonable member of the public to consider acceptance inappropriate?

I IMPARTIAL

- If accepted, would a reasonable member of the public be confident that the Council is impartial and will remain impartial?

F FREE

- Would it be clear to a reasonable member of the public that the donor does not expect any favourable treatment from the Council or its members in return?

T TRANSPARENT

- Has the gift, gratuity or hospitality has been declared openly to the Council, to colleagues and the public?

  If the answer to any of the foregoing questions is 'NO' then the offer of a gift, gratuity or hospitality must be declined. In addition the offer must be declared using the Gifts, Gratuities and Hospitality Registration Application.

Rules at a glance

Category	Examples (indicative)	Action	Registration
Acceptable	Low-value tokens; working lunches by public/professional bodies	May accept (no influence risk)	Not necessary if <£25
Needs prior approval	Invitations to events; repeat offers totalling £25 in any 12 months	Seek line-manager approval before accepting	Yes
Prohibited	Cash; alcohol; anything that could be perceived to influence	Politely decline (use template)	Yes (declined offer)

How to decline

If an offer is inappropriate or risks the perception of influence, politely decline and explain that acceptance would be contrary to Council policy. Where returning an item would cause unnecessary offence, arrange for the donation to a local charity and record this on the Register. For direct offers (such as by post), return where possible; if not, record and arrange donation for charitable use..

Registration

The Gifts, Gratuities, Hospitality Registration Form must be completed in respect of all applicable:

- Gifts / Gratuities offered (accepted or declined)
- Gifts / Gratuities received (accepted or declined)
- Hospitality offered (accepted or declined)
- Hospitality received (accepted or declined).

Record any offer/acceptance via the Gifts, Gratuities and Hospitality Form – your manager must authorise before acceptance.

Public contracts and failure to prevent bribery

Under the Procurement Act 2023, there are specific provisions regarding the exclusion of suppliers convicted of certain offences, including bribery. The Economic Crime and Corporate Transparency Act 2023 and the Failure to Prevent Fraud offence that took effect in September 2025, imposes the need for proactive diligence.

Mandatory Exclusion Grounds:

Contracting authorities are required to exclude a supplier if it, or a connected person, has been convicted of specific offences. These offences encompass various forms of misconduct, including bribery. Notably, the Act specifies that convictions under sections 1, 2, 6, or 7 of the Bribery Act 2010 constitute grounds for mandatory exclusion.

Discretionary Exclusion Grounds:

Beyond mandatory exclusions, the Act provides contracting authorities with the discretion to exclude suppliers for certain misconducts, even in the absence of a conviction. This includes serious professional misconduct, which is explicitly stated to cover dishonesty, impropriety, and serious breaches of ethical or professional standards. For instance, offences such as failing to prevent bribery under section 7 of the Bribery Act 2010 may fall under this category.

Self-Cleaning Provisions:

Suppliers subject to exclusion grounds have the opportunity to demonstrate their reliability through “self-cleaning” measures. This process involves providing evidence that they have addressed the issues leading to the exclusion, such as paying compensation, implementing corrective measures, or enhancing compliance programmes. If a supplier successfully demonstrates that the circumstances leading to the exclusion are unlikely to recur, they may be permitted to participate in procurement procedures.

Borough Council of King's Lynn & West Norfolk

ANTI-FRAUD & ANTI-CORRUPTION POLICY

September 2026

Contents Page

1. INTRODUCTION

1.1 Where people commit fraud against the public sector and public services, they take money away from the services on which the public depend, and damage citizens' trust in the government. The Borough Council of King's Lynn and West Norfolk (the Council) is committed to protecting the public funds entrusted to it and to upholding the highest standards of financial probity and accountability. We cannot afford to be complacent, and we urge all our members, employees, contractors, and partners to assist us in fighting fraud by having regard to this policy and the risks of fraud when carrying out their duties, recognising that, if uncontrolled, fraud diverts much needed resources from our communities.

1.2 The "Annual Fraud Indicator 2023" produced by Crowe Clark Whitehall estimated that annual UK fraud losses could be £219 billion, with Public Sector fraud losses estimated to be £50.2 billion. The Government's "Economic Crime Plan 2023-2026" states that Fraud accounted for an estimated 41% of all crime experienced by adults in England and Wales in the year ending September 2022. Fraud is now the most common offence in the UK and local authorities continue to face significant fraud challenge, exacerbated by the Covid-19 pandemic and the ongoing cost-of-living crisis. Economic crime refers to a broad category of activity involving money, finance or assets, the purpose of which is to unlawfully obtain a profit or advantage for the perpetrator or cause loss to others. This poses a threat to the UK's economy and its institutions and causes serious harm to society and individuals. It includes activity which:

- Allows criminals to benefit from the proceeds of their crimes or fund further criminality,
- Damages our financial systems and harms the interests of legitimate business,
- Undermines the integrity of the UK's position as an international finance centre, and
- Poses a risk to the UK's prosperity, national security, and reputation.

1.3 This policy recognises that the terms "fraud" and "corruption" form part of a much wider agenda, but the policy has not been re-titled "economic crime"; however, acknowledging this enables us to have an awareness and provide a holistic response to the following types of criminality:

- Fraud against the individual, private sector, and public sector
- Terrorist financing
- Sanctions contravention
- Market abuse
- Corruption and bribery
- The laundering of proceeds of all crimes.

1.4 This policy details the Council's arrangements for managing the risk of fraud and corruption. We are committed to reducing losses from fraud by using an integrated approach which encompasses the Fighting Fraud and Corruption Locally (FFCL) 2020's standards of:

- Governance (accountability, leadership, awareness, strategy, resources, authority, and independence),
- Operations (capability & competency, risk assessment, intelligence & data, collaboration, prevention, investigation, and redress), and
- Reporting (measurement, transparency, and monitoring).

1.5 The threat and risks of fraud and corruption are ever evolving and can quickly develop into new and complex fraud attacks and as such our response to countering fraud needs to be dynamic as developments in technology, social change and other factors create new challenges.

2. DEFINITIONS

2.1 This policy is designed to cover the risks associated with theft, fraud, corruption, bribery, and ICT abuse, whether they are perpetrated by employees, councillors, residents, visitors, contractors, suppliers or individuals and organisations unconnected with the Council. For the purpose of this policy the following definitions are used:

2.2 Fraud

Fraud is a general term covering theft, deliberate misuse or misappropriation of assets or anything that leads to a financial advantage to the perpetrator or others upon whose behalf he or she acts, even if these "others" are in ignorance of the fraud. Fraud is in fact intentional deceit and for this reason it cannot include negligence.

Fraud is defined as the intentional distortion of financial statements or other records by persons internal or external to the authority which is carried out to conceal the misappropriation of assets or otherwise for gain.

In addition, fraud can also be defined as the intentional distortion of financial statements or other records by persons internal or external to the authority which is carried out to mislead or misrepresent.

The Fraud Act 2006 which came into effect on 15th January 2007 created a new general offence of fraud with three ways of committing it: -

a. Fraud by false representation,
b. Fraud by failing to disclose information, and
c. Fraud by abuse of position.

2.3 Theft

A person is guilty of theft under the Theft Act 1968 if they dishonestly appropriate property belonging to another with the intention of permanently depriving the other of it. It is immaterial whether the appropriation is made with a view to gain or is made for the thief's own benefit. In terms of "appropriation", any assumption by a person of the rights of an owner amounts to an appropriation, and this includes, where they have come by the property (innocently or not) without stealing it, any later assumption of a right to it by keeping or dealing with it as owner. "Property" includes money and all other property, real or personal, including things in action and other intangible property.

2.4 Corruption

Corruption is defined as the offering, promising, or giving a payment or benefit-in-kind in order to influence others to use their position in an improper way to gain an advantage. It is also a criminal offence to request, agree to receive or accept a bribe.

2.5 Bribery

A bribe is a financial or other advantage that is offered or requested with the intention of inducing or rewarding the improper performance of a relevant function or activity, or with the knowledge or belief that the acceptance of such an advantage would constitute the improper performance of such a function or activity. The Bribery Act 2010 reformed criminal law regarding bribery related offences, making it easier to tackle this offence proactively in both the public and private sectors. Four main offences of bribery were created as a result of the act:

- Offence of bribing another person
- Offence of being bribed.
- Bribery of foreign public officials
- Failure of commercial organisations to prevent bribery.

The corporate offence of failure to prevent bribery means that commercial organisations (including public organisation's wholly owned companies, subsidiary companies, and traded services) and their boards may be exposed to criminal liability if it is found that adequate procedures to prevent bribery have not been implemented.

2.6 ICT Abuse

There is no definition of ICT fraud and abuse, but the Audit Commission devised the following list to determine the different acts that it covers:

Type of ICT Fraud or Abuse	Ways Committed
Business Disruption	• Virus infections/denial of service • Hacking • Sabotage
Reputational Damage	• Accessing inappropriate material • Invasion of privacy • Using unlicensed software
Financial Loss	• Unauthorised alteration of input • Destroying, stealing, or suppressing output • Making unapproved changes to stored information. • Amending or misusing programs • Using ICT facilities for private work • Theft of information

2.7 Money Laundering
Money laundering risks are managed through the Council's Anti-Money Laundering Policy and AML Procedures. Operational steps are set out in the AML Procedures.

3. POLICY STATEMENT

3.1 The Council is committed to the prevention, detection and deterrence of fraud and corruption and the protection of public funds. This policy is the over-arching anti-fraud and anti-corruption policy for the Council and all the varying functions that it delivers, including any functions and activities delivered through its Local Authority Trading Companies (LATCs) in its fight against fraud and corruption both internally and externally. For the purpose of this Policy the term "Council" refers the Council and its LATCs.

4. AIMS

4.1 This policy recognises that the Council as a large organisation is at risk of loss due to fraud and corruption both internally and externally. As such this policy sets out the approach that the Council uses to manage the risk of fraud and corruption and minimise the losses incurred.

4.2 There is an expectation and requirement that all Members, employees, consultants, contractors, partner organisations, volunteers and service users be fair and honest, and if able to do so, provide help, information, and support to assist the investigation of fraud and corruption. In addition, advice on how members of the public may raise suspicions about fraud and corruption is contained within this policy.

4.3 The Council is committed to an effective anti-fraud and anti-corruption policy designed to:

a) Encourage prevention,
b) Promote detection and deterrence,
c) Ensure effective investigation where suspected fraud or corruption has occurred, and
d) Take action (including prosecuting offenders) where appropriate.

5. SCOPE

5.1 The Council faces several different fraud and corruption risks over a large range of service areas and functions that it undertakes. The Internal Audit team have developed and maintain a Fraud Risk Register for its internal use to establish risks and highlight internal controls that can be used to mitigate those risks to minimum/acceptable levels. The Fraud Risk Register enables the Council to identify both internal and external fraud and corruption risks and then assess their likelihood and impact. It then evaluates the risks and identifies internal anti-fraud controls to be implemented to prevent, detect, and mitigate residual fraud risk. The Fraud Risk Register is maintained as a live document to continue to inform and update on counter fraud activities and controls required. Please see Appendix 1 for details of the fraud risks the Council could face.

6. ROLES AND RESPONSIBILITIES

6.1 The following structures are recognised within the Council:

Role	Responsibility
All Councillors	• **Uphold the highest standards of conduct and conduct themselves in ways that are beyond reproach.** • Demonstrate a commitment to this policy and ensure it has the appropriate profile within the Council. • Facilitate an Anti-Fraud and Anti-Corruption culture. • Understand their responsibility to report suspected fraud or corruption and how to do it. • Understand the need to declare any interests that may conflict with their work for the Council. • Undertake the fraud awareness e-learning training. • Declare in a timely manner any gifts and hospitality received.

All Employees	• **Uphold the highest standards of conduct and conduct themselves in ways that are beyond reproach.** • Understand and comply with the Council's Anti-Fraud and Anti-Corruption Policy. • Understand their responsibility to report suspected fraud or corruption and how to do it. • Understand the need to declare any interests that may conflict with their work for the Council. • Undertake the fraud awareness e-learning training. • Declare in a timely manner any gifts and hospitality received.
Cabinet	• To approve the Anti-Fraud and Anti-Corruption Policy. • Ensure the policy is effectively implemented across the Council.
Audit Committee	• To monitor and review the effectiveness of the Council's risk management arrangements, internal controls, and related counter fraud arrangements.
Chief Executive	• Ensure that there is strong political and executive support for work to counter fraud and corruption. • Ensure consistency across Directorates in the implementation of this policy.
Monitoring Officer	• To report on matters they believe are, or are likely to be, illegal or amount to maladministration. • To be responsible for matters relating to the conduct of Councillors and employees. • To be responsible for the operation of the Council's Constitution.
Assistant Director, Finance (Deputy S151 Officer)	• Assistant Director with specific responsibility for the investigation and detection of fraud. • To ensure the Anti-Fraud and Anti-Corruption Policy is reviewed and maintained at appropriate intervals. • Ensure that those working to counter fraud and corruption are undertaking the work in accordance with a clear ethical framework and standards of personal conduct. • Ensure that those working to counter fraud and corruption are professionally trained and accredited for their role and attend regular refresher courses to ensure they are up to date with new developments and legislation. • Ensure that there is a level of financial investment in counter fraud and corruption work that is proportionate to the risk identified.

	• Ensure that reports on investigations include a section on identified internal control weaknesses that enabled the fraud to take place and action to be taken to correct the weakness where appropriate.
Assistant Director, Corporate Services	• Ensure there are effective recruitment procedures in place, implemented by appropriately trained officers. • Ensure employment policies support the Anti-Fraud and Anti-Corruption Policy. • Ensure effective and appropriate sanctions are applied in all relevant cases.
Executive Leadership Team/ Corporate Leadership Team	• Ensure the risks of fraud and corruption are identified and procedures implemented to reduce the risk to an acceptable level. • Ensure the Anti-Fraud and Anti-Corruption Policy is implemented within their Directorate. • Ensure the risk of fraud and corruption is considered in all new processes and appropriate procedures implemented. • Determine the appropriateness of gifts and hospitality offered to employees within their Directorate. • Maintain a Register of Interests and a Register of Gifts and Hospitality for their employees/service areas.
Service Managers	• Ensure all their employees are aware of their responsibilities under the Anti-Fraud and Anti-Corruption Policy. • Ensure all their employees are aware of all relevant policies and procedures relating to official conduct of Council business. • Ensure all their employees are aware of, and understand, the Whistleblowing Policy and arrangements, and the process for reporting fraud. • Ensure accurate and timely reporting of gifts and hospitality, and declaration of interests by employees. • Undertake the fraud awareness e-learning for Managers
Internal Audit	• Be influential to the Council, understanding fraud and corruption, and how it is evolving, and be responsible for the Council's response. • Support Executive/Assistant Directors and Managers in identifying and mitigating risks for fraud and corruption. • Undertake a planned programme of internal audits to examine the system of internal controls and agree actions to correct any identified weaknesses. • Undertake data matching exercises with national/local bodies and investigate results for potential frauds.

	• Provide specialist skills in investigating allegations of fraud, especially where it may result in a prosecution.
Financial Services	• Qualified Professionals maintain the standards of their professional bodies for professional development and ethics. • Designing out the risk of fraud in maintaining the Councils systems for payments and income. • Monitor and enforce compliance with the Council's Financial Regulations.
Democratic Services Manager	• Ensure Members are aware of their obligations in respect of the Anti-Fraud and Anti-Corruption Policy. • Ensure members are aware of, and abide by, their obligations in relation to probity. • Maintain a Register of Interests and a Register of Gifts and Hospitality for Members and employees.
Procurement Services	• Ensure tender/contract procurement exercises are undertaken in line with Contract Standing Orders. • As part of tender/contract procurement exercises ensure that Non-Collusion/Prevention of Corruption documentation is appropriately signed and recorded. • Ensure that suppliers have relevant anti-fraud and anti-corruption policies in place or that they are provided with copies of our policies (Anti-Fraud & Anti-Corruption Policy, Anti-Money Laundering Policy, Whistleblowing Policy), promoting the spirit of anti-fraud and anti-corruption culture.
Contractors and partners	• Create an environment in which staff feel able to approach them (or the Council directly) with any concerns they may have about suspected irregularities including fraud and corruption or other whistleblowing concerns. • Operate to the same standards of ethical conduct expected from Council staff.

6.2 Those charged with governance as above will:

- Acknowledge their responsibility for the management of fraud and corruption risks to the Council;
- Demonstrate support and strategic direction for counter fraud work;
- Help to create the anti-fraud and corruption culture which can be reinforced by their active oversight across the Council;
- Have regard to the rights of citizens and conduct practices ethically and with integrity - following due process; and
- Champion adherence to the above responsibilities and the Council's Corporate Framework (including the Corporate Code of Conduct) and making contractors and consultants aware.

7. RULES AND PROCEDURES

7.1 The Council has various procedures and rules to ensure that the day-to-day operations and activities are properly controlled and are an important part of the internal control framework. These include: -

- Council Constitution including Financial Regulations;
- Contract Standing Orders Procurement Rules;
- Code of Conduct for Councillors and Voting Co-opted Members;
- Officers' Code of Conduct; and
- Scheme of Delegation.

7.2 Individual Services will have also introduced their own measures designed to control their activities e.g., schemes of delegation, working manuals etc.

7.3 Assistant Directors and Service Managers need to ensure that staff have access to these rules and regulations and that staff receive appropriate training.

7.4 Failure to comply with the rules and regulations may result in formal action being taken. In the case of employees this would be through the Council's disciplinary process and for Members would involve the Standards Committee. It is the responsibility of the Monitoring Officer to report matters to the Standards Committee.

8. HOW TO RAISE SUSPICIONS OF FRAUD, CORRUPTION & BRIBERY

8.1 All employees, Members, customers, suppliers, contractors, and members of the public can raise their concerns either via:

- Contacting the Council's Customer Information Centre (01553 616200)
- Emailing internalauditemail@west-norfolk.gov.uk
- Directly contacting the Council's Internal Audit Service (01553 616701)
- Writing to Internal Audit, Borough Council of King's Lynn & West Norfolk, King's Court, Chapel Street, King's Lynn, Norfolk, PE30 1PX

8.2 Council Tax Reduction Scheme (Council Tax Support) fraud can be reported via the following channels:

- Contacting the Council's Customer Information Centre (01553 616200)
- By email to benefit.fraud@west-norfolk.gov.uk
- Online via the Borough Council's website at https://www.west-norfolk.gov.uk/info/20021/benefit_fraud/4/report_benefit_fraud
- Writing to Internal Audit, Borough Council of King's Lynn & West Norfolk, King's Court, Chapel Street, King's Lynn, Norfolk, PE30 1PX

8.3 Report concerns via the Whistleblowing route (anonymous option available). Where matters concern conduct/standards, notify the Monitoring officer. Money-laundering suspicions must be reported to the MLRO in line with the AML Procedures.

9. PREVENTION

9.1 There are a number of key processes that can assist in the prevention of fraud, including:

1. Internal Control Systems,
2. Employee recruitment and conduct,
3. Joint working to prevent and combat fraud,
4. Use of technology, and
5. The work of the Audit Committee.

9.2 <u>Internal Control Systems</u>

Internal controls are in place to prevent fraud. It is the responsibility of all managers to establish and maintain systems of internal control and to assure themselves that those controls are properly applied as intended. This includes responsibility for the prevention and detection of fraud and corruption.

The Council implements strong systems of verification of all claims for all types of financial assistance. All data available will be used to corroborate information given by applicants for the purpose of prevention and detection of fraud. Grants and assistance given to external organisations will be monitored to ensure applications are genuine.

The evaluation of tenders during the procurement process will seek evidence of commitment to prevention of fraud and corruption for contracts of significant value and risk, the council.

The Internal Audit Team will ensure that an adequate and effective internal audit is undertaken of the Council’s systems and processes and will investigate allegations of fraud and corruption. Any system weaknesses that are identified as part of these investigations will be reported to the relevant manager / Assistant Director and an action plan agreed to remedy the issue. The Audit Committee will receive regular reports from the Internal Audit Manager on the results of internal audits and any investigations, including follow-up on the implementation of agreed actions.

The Internal Audit Team have also developed a Fraud Risk Register which is being used to understand what information and data is held within each service area within the Council that could be subject to fraud and corruption. Internal

Audit will maintain the Fraud Risk Register to support the mitigation of risk through the implementation of effective controls.

9.3 Employee recruitment and conduct

Recruitment procedures require that all applicants will provide evidence of any qualifications claimed and all references will be taken up. The right to work in the country will also need to be demonstrated where necessary.

All employees must abide by the Council's rules as contained in relevant policies and procedures. This expectation forms part of the employee's contract of employment. Employees are also expected to follow any additional Codes of Conduct of a professional body to which they are registered.

All new Members and employees shall be given access to this policy document as part of their initial induction process.

9.4 Joint working to prevent and detect fraud

The Council participates in data-matching exercises such as the National Fraud Initiative (NFI), and the Norfolk FraudHub. The Council also makes full use of its statutory powers to obtain information using bodies such as the National Anti-Fraud Network (NAFN) to identify possible instances of fraud. The Internal Audit team also conduct joint working with the DWP for the purposes of investigating benefit fraud/error and with Housing Associations for the investigation of Right to Acquire and Tenancy Fraud.

9.5 Use of Technology

The Council will make use of technology and other measures made available for the prevention and detection of fraud and corruption; this may include software available for these purposes where an appropriate Data Privacy Impact Assessment has been undertaken and legislation allows their use. Examples of such software include the use of "AppCheck", an application checking tool available through the Cabinet Office to highlight risk relating to applications that have been received which may be fraudulent.

9.6 Audit Committee

The Terms of Reference for the Audit Committee require it to *'assess the potential harm to the council from fraud and corruption, monitoring counter-fraud policy, action and resources'*. As such the Committee receives regular reports from the Internal Audit Manager on work carried out and considers the adequacy of the Council's polices relating to the prevention and detection of fraud and corruption.

9.7 All Members and employees are required within 28 days of receiving any gift or hospitality over £50 to provide written notification to the Monitoring Officer or their Assistant Director, of the existence and nature of the gift or hospitality. Registers are maintained of all declarations.

9.8 Members are required to declare their interests in accordance with the Code of Conduct for Members and Voting Co-opted Members and to act in accordance with the Code.

9.9 All employees must comply with any requirements of the Council to register or declare interests and declare hospitality, benefits or gifts received as a consequence of his or her employment as per the Officers' Code of Conduct. Registers of Interests, memberships of, or associations with, clubs, societies and other organisations are kept to protect and safeguard the interests of all staff and the Council, where conflicts of interest may arise. Examples of where conflicts of interest may arise and how they should be approached are given below:

- Employees should not have any involvement in the procuring of goods and/or services from a supplier that is a friend / family member or other associate such as their landlord.
- Employees should not have any involvement in the processing of invoices relating to goods or services from a supplier that is a friend / family member or other associate such as their landlord.
- Employees should not have any involvement in the assessment / processing of claims for grants, benefits, or any other type of financial assistance relating to a friend/family member or other associate such as their landlord.
- Employees should not have any involvement in the handling / processing of any forms / documents relating to business rates accounts, council tax accounts or tenancies / leases of friends / family members or other associates, such as their landlord.
- Employees should not have any involvement in cash transactions or any other type of financial transactions that relate to friends / family members or other associates, such as their landlord.

9.10 Any employees found to be in breach of these controls will be subject to disciplinary proceedings.

9.11 The Council is committed to working and co-operating with other organisations to prevent organised fraud and corruption. This may involve the exchange of information with other organisations and data matching (in accordance with the Data Protection Act and General Data Protection Regulations 2018).

9.12 The Council will conduct other anti-fraud and anti-corruption measures as it sees fit where they are compliant with relevant legislation and/or regulations.

10. DETECTION AND INVESTIGATION

10.1 Fraud cannot be prevented entirely. All members and employees must know how to act when they detect or reasonably suspect it. Preventative controls reduce risk, but concerns may arise via controls, tips or chance; report them promptly via the Whistleblowing route.

10.2 <u>What should be reported?</u>

Concerns which should be reported include, but are not limited to staff/Council Members/Associates or others committing or attempting to commit:

- Any dishonest or fraudulent act.
- Forgery or alteration of documents or accounts.
- Misappropriation of funds, supplies or other assets.
- Impropriety in the handling or reporting of money or financial transactions.
- Profiting from an official position.
- Disclosure of official activities or information for advantage.
- Accepting or seeking value from third parties by virtue of official position or duties.
- Theft or misuse of property, facilities, or services.
- Offering or receiving bribes.

External organisations' actions which should be reported include:

- Being offered a bribe or inducement by a supplier.
- Receiving fraudulent (rather than erroneous) invoices from a supplier.
- Reported allegations of corruption or deception by a supplier.

10.3 <u>What happens if we are contacted by the press in relation to suspected or actual fraud, bribery, or corruption?</u>

All media enquiries about suspected / active / completed cases are handled only by the Moniotring Officer, the Chief Executive or S151 Officer. Employees / Members / third parties must not comment publicly. See Corporate Communications Policy.

10.4 Alternatively, the Council's **Whistleblowing Policy** encourages and enables employees to raise any serious concerns. Employees who report their concerns in this way are afforded certain rights and protections under the Public Interest Disclosure Act 1998.

10.6 Financial Regulations require that whenever any matter arises which involves or is thought to involve financial or other irregularity, the relevant Executive

Director/Assistant Director concerned must immediately notify the Assistant Director, Resources (S151 Officer), Monitoring Officer or the Audit Manager. Where a member of staff identifies a potential fraud or irregularity, they should follow the guidance in the Council's Whistleblowing Policy and this policy. Reporting cases in this way is essential to this policy to ensure that:

- All suspected cases of fraud and corruption are investigated properly;
- There is a standard process for dealing with all suspected cases of fraud and corruption; and
- People and the Council's interests are protected.

10.7 Internal Audit will consult with the relevant Assistant Directors to decide on the type and course of investigations. Personnel staff will also be consulted and involved where appropriate in investigations, particularly where they may lead to disciplinary action. This will include referring cases to the Police where necessary. Internal Audit may also seek informal advice from the Police in the early stages of an investigation. Care will be taken to ensure that internal disciplinary procedures are followed but do not prejudice any criminal case.

10.8 Allegations of fraud will be assessed by the Internal Audit Manager or Senior Internal Auditor with the relevant Assistant Director, Assistant Director Resources (S151 Officer) and Executive Director, Central Services. The appropriate course of action will be agreed and if necessary, investigated by a suitably qualified senior member of staff independent of the area under suspicion or by a suitably qualified external person ("the investigating officer") appointed by the Assistant Director (or if they are the subject of the allegation, an Executive Director, the Chief Executive or Chair of the Audit Committee). Before making such an appointment, consultation may be undertaken with any member of the Executive Director Team, the Chief Executive, the Leader of the Council, the Chair of the Audit Committee, and any other person whom they consider appropriate. This may include staff from technical areas to provide specific insight into any relevant issues.

10.9 If the initial enquiry reveals that further investigation needs to take place, it may be necessary to preserve the available evidence. Evidence may take various forms and the way it should be handled is as follows:

- Original documents – these should be handled as little as possible and placed in a protective folder with only one person responsible for maintaining them in a secure/locked place.
- Computer held data – the computer should be secured, and the IT department consulted on how to best retrieve the data.
- Cash – where cash needs to be counted, this should be done so by the person responsible for it and their manager. A statement should then be signed to confirm a correct record of the amount.

- Video evidence – any video recording that could provide information of value should be secured so that it can be treated in accordance with the Police and Criminal Evidence Act 1984 (PACE) Under no circumstances should it be viewed by anyone.

10.10 Allegations of fraud against Members which results in a complaint of misconduct under the Members' Code of Conduct will be dealt with in accordance with the codes of conduct established within the Localism Act 2011.

10.11 Where controls have been found to have not been followed or in the event that poor controls are identified as a contributing factor to fraud and corruption, these details will be captured as lessons learned and fed into the Fraud Risk Register and highlighted to the relevant Service areas by the Internal Audit Team in order to maintain a process of continuous improvement and to keep the Council's response to Fraud and Corruption dynamic.

11. DETERRENCE

11.1 The Council will seek the most appropriate sanction and redress against all those who commit fraud and/or corruption against the Council.

11.2 Where appropriate, and subject to our statutory obligations under data protection legislation, we will publicise details of criminal convictions and provide statistical information in relation to disciplinary action to deter others who may consider committing such offences themselves.

11.3 All managers have a responsibility for ensuring that control measures are in place to minimise the risk of fraud and ensure all staff are aware of these procedures. Where effective controls are in place there is less opportunity to commit fraud, which in turn acts as a deterrent.

11.4 It is essential that all Members and officers (including agency staff, volunteers, and contractors) adhere to the responsibilities set out within the "Roles and Responsibilities" section of this policy to assist in the deterrence of fraud and corruption.

12. SANCTIONS AND REDRESS

12.1 The strongest available sanctions will be pursued against all who commit fraud and/or corruption against the Council. This may include disciplinary action, prosecution, civil proceedings, or a combination of all. The decision to recommend any or all of these sanctions will be made on a case-by-case basis, having regard to the nature and extent of the fraud and evidence available.

12.2 At the conclusion of the investigation a report will be written, concluding on whether there is a case to answer. The final decision on the course of action to be taken will be made by the Executive Director/Assistant Director concerned. Any decision to refer the matter to the police will be taken jointly by the Assistant Director, Resources (S151 Officer), Executive Director, Central Services and the relevant Assistant Director of the service affected.

12.3 In cases of proven fraud, the Council will seek to recover any monies and will use all means available to recover these amounts. This can include freezing assets, Compensation Orders, Confiscation Orders, Civil Litigation, and general debt recovery according to the circumstances of the fraud.

12.4 Where a criminal conviction has been secured, the Council will seek a Compensation Order through the Courts and consider using the Proceeds of Crime Act 2002 to recover losses.

12.5 Concerns raised in good faith that turn out to be unfounded or cannot be proven will not result in any negative consequences for those who reported them. However, unfounded allegations made by Council Officers for malicious purposes may be referred to Personnel. Malicious allegations may constitute misconduct and have potential disciplinary consequences.

13. COLLABORATION

13.1 Arrangements are in place and will be maintained to facilitate joint working to enhance the counter fraud activity, and to liaise proactively with other organisations and agencies to assist in countering fraud, sharing resources, skills and learning, good practice and innovation, and information. Information will be exchanged as appropriate on national and local fraud and corruption activity and arrangements with external organisations including:

- The Police;
- Other councils and housing associations;
- Partner organisations to the Council;
- The External Auditor;
- The Local Government Ombudsman;
- The Department for Work and Pensions (DWP);
- The Cabinet Office;
- The National Anti-Fraud Network (NAFN);
- Other member organisations of the Norfolk FraudHub.

13.2 Through such arrangements the Council will also benefit from a range of appropriately skilled people from diverse counter fraud disciplines including, and beyond, investigation.

13.3 DATA MATCHING

The Council will undertake data matching exercises as appropriate for the purposes of identifying and reducing fraud and corruption.

Monthly data matching files and Real Time Information (RTI) are received from the DWP, and the information used to identify any incorrectness of a Housing Benefit or Council Tax Support claim.

The Council also takes an active part in the National Fraud Initiative (NFI) as organised by the Cabinet Office and the Norfolk FraudHub which involves Norfolk County Council and all District Authorities within Norfolk. These involve submitting data we hold in various departments of the Council for matching to data held by other organisations and other departments to identify discrepancies and following up promptly any highlighted matches returned that identifies anomalies that may be indicative of fraud or error. The use of intelligence information and data analytics in this way allows the Council to direct resources more efficiently and effectively, through identifying anomalous transactions or events for further investigation.

14. ANTI-FRAUD AND ANTI-CORRUPTION CULTURE

14.1 In order to tackle fraud and corruption effectively, the Council aims to develop and maintain an anti-fraud culture which maximises the engagement of all Members, employees, contractors, and partners of the Council. We all have a collective responsibility to have an awareness of fraud and corruption, and should consider the following five Fraud and Corruption Principles:

1. **There is always going to be fraud**
   It is a fact that some individuals will look to make gain where there is opportunity, and the Council needs robust processes in place to prevent, detect and respond to fraud and corruption.

2. **Finding fraud is a good thing**
   If you do not find fraud you cannot fight it. The identification of fraud should be viewed as a positive and proactive achievement.

3. **There is no one solution**
   Addressing fraud needs a holistic response incorporating detection, prevention, and redress, underpinned by a strong understanding of risk. It

also requires cooperation between organisations under a spirit of collaboration.

4. **Fraud and corruption are ever changing**
Fraud, and counter fraud practices, evolve very quickly and the Council must be agile and change its approach to deal with these evolutions when the need arises.

5. **Prevention is the most effective way to address fraud and corruption**
Preventing fraud through effective counter fraud practices reduces the loss and reputational damage (although this can be difficult to measure). It also requires less resources than an approach focused on detection and recovery.

14.2 This policy recognises that the Council should strive for a culture and tone of honesty, and opposition to fraud and corruption.

14.3 There is an expectation and requirement that all individuals, businesses, and organisations dealing in any way with the Council will act with high standards of probity, openness and integrity and that Council Members, employees or its agent(s) at all levels will lead by example in these matters.

14.4 The Secretary of State has specified the general principles which are to cover the "conduct of members and co-opted members". The Council will develop its working behaviour around these principles.

14.5 The Council's Members' Code of Conduct and Employees Code of Conduct set out the approach to work that is honest, fair, accountable and, as far as possible, transparent. Members and employees must act in line with the codes at all times.

14.6 The Council's employees are a vital element in its stance against fraud and corruption, and they are positively encouraged to raise any concerns that they may have.

14.7 All information supplied will be dealt with fairly, confidentially and in line with the Council's internal sets of procedures and data protection legislation. Data protection legislation refers to the Data Protection Act 2018 and General Data Protection Regulations (UK GDPR).

14.8 Assistant Directors are expected to deal firmly and quickly with those who are corrupt, who seek to corrupt, who defraud, or who seek to defraud the Council. Cases involving staff will usually lead to disciplinary action, which may result in dismissal. Where there is prima facie evidence that a criminal offence has been committed internally it is the policy of the Council to refer cases to the Police.

14.9 There is a need to ensure that any investigative process is not misused and, therefore, any abuse, such as raising unfounded malicious allegations, may be dealt with as a disciplinary matter.

14.10 In relation to complaints involving Members, Internal Audit will consult the Monitoring Officer on whether or not the complaint falls within the scope of the "Members' Code of Conduct" and if so, what further steps (if any) should be taken.

14.11 The Standards Committee includes amongst its roles and functions the promotion and maintenance of high standards of conduct by Members, assisting Members to observe the "Members' Code of Conduct" and the monitoring and operation of the "Member's and Officer's Codes of Conduct". The Audit Committee maintains an overview of Internal and External Audit in relation to the "Member's Code of Conduct" and an overview of the "Whistleblowing Policy".

14.12 <u>TRAINING AND AWARENESS</u>

The Council recognises that an important aspect of its Anti-Fraud and Anti-Corruption Policy is the general awareness and responsiveness of employees and Members throughout the Council. To facilitate this, the Council supports the concept of induction and training in anti-fraud awareness, particularly for employees involved in internal control systems. All employees are made aware of the Anti-Fraud and Anti-Corruption Policy via various channels of communication e.g., service team briefings and the Intranet (InSite). In addition, a copy of this document is distributed to all Service Managers.

The Council will seek via appropriate publicity to increase and maintain the general public's awareness of the facilities available to report concerns about fraud and corruption. A copy of this policy will also be made available to the general public on the Council's website.

The investigation of fraud and corruption is carried out in consultation with Services by the Council's Internal Audit Team whose skill base in investigative techniques is maintained by appropriate training.

14.13 Specific fraud awareness training is available to employees and members in e-learning format. Awareness training for line managers is mandatory to ensure their teams are aware of their responsibilities as highlighted within this policy.

14.14 The Internal Audit department will ensure it maintains an understanding of fraud and corruption, and how it is evolving, and be responsible for the Council's response, this will help to develop future fraud and corruption awareness training and communications across the Council, it's LATCs and our partners and contractors.

15. HOW THE COUNCIL WILL PREVENT FRAUD AND CORRUPTION

15.1 The Council has a dedicated resource to counter fraud (including corruption) within the Internal Audit team that undertakes a range of counter fraud work appropriate to the fraud risks that have been identified by the Council. The resource includes accredited counter fraud specialist(s), with a working knowledge of ethical practices and due process. The Internal Audit team investigate cases of fraud and corruption in consultation with service areas affected.

15.2 Counter Fraud staff will attend regular refresher courses to ensure they are abreast of new developments and legislation. Where staff have roles that include delivering fraud controls, the Council will also ensure they are suitably trained, and understand the controls they operate.

15.3 The Council will seek via appropriate publicity to increase and maintain the general public awareness of the facilities available to report concerns about fraud and corruption.

15.4 Advice and guidance on how to pursue matters of concern may be obtained by contacting the Council's Customer Information Centre on 01553 616200 who can then direct queries to the following persons:

- Chief Executive
- Assistant Director, Resources (S151 Officer)
- Monitoring Officer
- Policy, Performance & Personnel Manager
- Audit Manager
- Senior Internal Auditor

16. EQUALITIES IMPLICATIONS

16.1 This policy is considered to have no equalities implications.

17. REFERENCE DOCUMENTS

17.1 This policy outlines the Council's approach to fighting fraud and corruption; it links in closely to the over-arching national strategy "Fighting Fraud and Corruption Locally, 2020 Standards".

17.2 Other Council documents that should be considered along with this document are:

- Whistleblowing Policy
- Anti-Money Laundering Policy
- Anti-Money Laundering Procedures
- Regulation of Investigatory Powers Act 2000 (RIPA) Policy
- Revenues & Benefits Service Penalty and Prosecution Policy
- Members Code of Conduct
- Employee Code of Conduct
- Anti-Bribery Policy

18. VERSION CONTROL

Policy name		Anti-Fraud & Anti-Corruption Policy		
Policy description		This policy outlines that the Council as a large organisation is at risk of loss due to fraud and corruption both internally and externally. This policy sets out the approaches the Council uses to manage the risk of fraud and corruption and minimise the losses incurred. Its purpose is to clarify to Members, employees, the general public and other organisations what the Council's policy and approach is and how the Council intends to meet its responsibilities relating to fraud and corruption, whether attempted internally or externally. This policy relies on the Anti-Bribery Policy and the Anti-Money Laundering Procedures. Where conflicts arise, those documents prevail for their subject areas.		
Responsible Officer		Jamie Hay, Senior Internal Auditor		
Version number	Date formally approved	Reason for update	Author	Review date
1.0	08/07/21	To replace the previous Anti-Fraud and Corruption strategy with a Policy document and review it against new and emerging	Senior Internal Auditor	November 2023

		risks as well as national strategy.		
1.1	17/06/24	To amend titles / officers with roles within the policy due to personnel changes and confirm the policy remains up to date with national strategy / legislation. To also include details of further controls and anti-fraud/anti-corruption activities undertaken across the organisation, including by Financial Services and Procurement.	Senior Internal Auditor	January 2024
1.2		To amend titles / officers with roles within the policy due to personnel changes and confirm the policy remains up to date with national strategy / legislation.	Assistant Director - Finance	September 2026

Appendix 1

FRAUD RISKS FACED BY THE COUNCIL

The fraud risks that the Council face include (but are not limited to):

All Service Areas/Corporately

- Commissioning of Services, including joint commissioning, joint ventures, commercial services, and partnerships with voluntary organisations involving risk of conflicts of interest, collusion, etc.
- False payment of grants, loans, or other financial support to any private individual or company, charity, or non-governmental organisation.
- False identity/fictitious persons applying for services/payments.
- Where an officer receives an email purporting to be from a senior officer requesting an urgent payment is made to a specified account.
- Exposure to suspect transactions (including money laundering).
- Cartels and organised crime groups (OCGs) increase prices by reducing or removing competition. OCGs can fraudulently obtain social housing or taxi licensing, make fraudulent benefit claims, or use Council services to launder criminal proceeds.
- The introduction of corporate criminal offences under the Criminal Finances Act 2017 introduces a strict liability for failing to prevent the facilitation of tax evasion by an associate of the Council, such as an employee or contractor. For example, a Council employee conspires with a supplier to falsify the amount paid on an invoice so that the supplier can evade paying income or corporate taxes. The Council will need to ensure that risks are identified and that procedures proportionate to those risks have been implemented.
- Bribery, excessive gifts, and hospitality.
- Secretive lobbying.
- Conflicts of interest.
- Theft of cash, assets, or other items such as data/information.
- Work not carried out, funds diverted, ineligibility not declared.

Care & Repair

- Fraudulent applications for adaptions/disabled facilities grants to homes aimed at the disabled.

Financial Services

- Where the Council receives a telephone call, email or letter purporting to be from a supplier requesting that their bank account details are amended.
- False claims, including slips and trips.

Housing and Tenancy Related

- Fraudulent applications under the right to buy/acquire.
- False applications for assistance with housing requirements.
- Fraudulent applications for housing or successions of tenancy and subletting of the property. Local Authorities have the powers and jurisdiction to investigate tenancy fraud offences relating to social housing (including on behalf of Housing Associations) under the Prevention of Social Housing Fraud Act 2013.

ICT

- Based upon Freedom of Information requests sent to 426 councils across the UK it was identified by Gallagher that 2,274,188 attempted cyber-attacks were reported by UK councils during 2022. This is 14% more than the 1,996,204 attempted cyber-attacks reported by UK councils in 2021 in the same FOI request.
- Cyber criminals may target council systems to gain access to sensitive financial information or manipulate transaction records to disguise money laundering activities.
- High-risk breaches of GDPR because of cyber criminality could result in penalties of up to £17.5million or 4% of annual turnover being imposed by the Information Commissioner's Office (ICO).

Payroll

- False ("ghost") employees, fraudulent overtime and expenses claims.
- Claiming sick leave while doing another paid job.
- Pay rate falsification.

Planning

- Relating to Section 106 Agreements and Community Infrastructure Levy (CIL) payments.

Procurement

- Number of potential procurement frauds, such as contract and tendering issues, split contracts, double invoicing, fake invoice fraud, supplier collusion and bid rigging, mandate fraud etc.

Revenues & Benefits

- Fraudulent applications for exemptions and reliefs (such a Small Business Rate Relief), unlisted properties (i.e., hereditaments that have not been appropriately registered for billing purposes).
- Fraudulent applications for and/or failure to report changes affecting discounts and exemptions (such a Single Person Discount, Student Disregards, Zero Occupancies and second home discounts, etc.).

- Fraudulent applications for and/or failure to report changes affecting Council Tax Support claims (such as undeclared partner's and/or other household members, undeclared income, undeclared capital, property, savings and/or investments).

<u>Licensing</u>

- Fraudulent/False applications for the purposes of receiving a licence or other beneficial gain.
- Failure to report changes affecting the status of a licence.

Appendix 2

LEGAL FRAMEWORK AND RELEVANT LEGISLATION

1.1 Local Authorities have a statutory duty under Section 151 of the Local Government Finance Act 1972 to make arrangements for the proper administration of their financial affairs. This includes the prevention, detection and deterrence of fraud and corruption.

1.2 There are also statutory requirements set out by the Fraud Act 2006, the Bribery Act 2010 and the 1968 Theft Act as set out in Section 2 (Definitions).

1.3 Alongside the offence legislation there are also other relevant pieces of legislation that govern the code of conduct in terms of investigation of offences:

<u>Human Rights Act 1998 (HRA) and the European Convention on Human Rights (ECHR)</u>

The Human Rights Act 1998 (HRA) applies to all public authorities. It incorporates the Articles contained in the European Convention on Human Rights (ECHR) into domestic law, making it unlawful for public bodies, to act in a way which is incompatible with the Convention. Paragraph 1 of Schedule 1 to the HRA lists the Articles under the ECHR. Those listed below are those most relevant to operational policing (investigating) and include the following rights:

- Article 1 Protection of property
- Article 2 Right to life
- Article 3 Prohibition of torture
- Article 4 Prohibition of slavery and forced labour
- Article 5 Right to liberty and security
- Article 6 Right to a fair trial
- Article 7 No punishment without law
- Article 8 Right to respect for private and family life
- Article 9 Freedom of thought, conscience, and religion
- Article 10 Freedom of expression
- Article 11 Freedom of assembly and association
- Article 12 Right to marry
- Article 14 Prohibition of discrimination.

<u>Criminal Procedure Investigation Act 1996 (CPIA)</u>

CPIA outlines the disclosure requirements for criminal investigations where persons are charged with a summary offence, indictable offence or one that is triable either way. CPIA further defines a criminal investigation and outlines the codes of practice for any investigation.

<u>Police and Criminal Evidence Act 1984 (and the Codes of Practice) (PACE)</u>

PACE sets out the balance between the powers of the police (or in terms of the Council, its investigating officers) and the rights and freedoms of the public. The PACE codes of practice cover:

- Stop and search
- Arrest
- Detention
- Investigation
- Identification
- Interviewing

The Regulation of Investigatory Powers Act 2000 (RIPA) and the Investigatory Powers Act 2016 (IPA)

RIPA and IPA relate to the use of covert surveillance techniques, such as:

- Directed surveillance,
- Covert human intelligence sources; and
- The acquisition of communications data.

The Council has a separate policy regarding this known as “The Regulation of Investigatory Powers Act 2000 (RIPA) Policy”.

The Data Protection Act 2018 (DPA) and the General Data Protection Regulations (GDPR)

In terms of investigations and anti-fraud and anti-corruption, DPA and GDPR govern how personal information/data and other sensitive data is recorded, retained, and revealed. DPA and GDPR contain provisions of certain exemptions which can be used:

- For the purposes of the prevention and/or detection of crime (including fraud and corruption);
- The assessment and/or collection of any tax or imposition of a similar nature, and;
- For the apprehension and/or prosecution of offenders.

The Economic Crime and corporate Transparency Act 2023

- The fraud prevention framework addresses the following six principles:
- Top level commitment
- Risk assessment
- Proportionate risk-based prevention procedures
- Due diligence
- Communication (including training)
- Monitoring and review.

Appendix 3

MEASURING IMPACT

1.1 The Council has adopted the Cabinet Office's national "Report Calculations" for measuring fraud loss where appropriate and uses local calculation methodologies where it feels local weighting should be applied and to furthermore enable the Council to be consistent with other member local authorities of the Norfolk FraudHub. As such, the Council will calculate fraud using the most up to date procedures and best practice.

1.2 Fraud and Error Reports are presented by Internal Audit to the Audit Committee on a half-yearly basis, to show how the Council is performing against the Anti-Fraud & Anti-Corruption Policy, the effectiveness of the policy and how the Council measures against the national counter-fraud standards (as set out within this policy document and the Fighting Fraud & Corruption Locally 2020 standards), including where appropriate details of corrective action where standards have not been met. The reports will include details of the level of fraud loss and will support a communication programme to publicise fraud and corruption cases.

1.3 The Council will conduct internal audits as part of the "Internal Audit Plan" that will review the effectiveness of the Council's Anti-Fraud and Anti-Corruption Policy, as well as periodic evaluations to provide objective feedback on the effectiveness of the investigation process. Internal Audit reviews consider any potential fraud risks which may exist within the subject area being reviewed, and where potential fraud risks exist, the mitigating controls will be identified and assessed. Periodic reviews will also be undertaken of policies, strategies and procedures surrounding anti-fraud and corruption.

Borough Council of
King's Lynn &
West Norfolk

ANTI-FRAUD & ANTI-CORRUPTION STRATEGY 2025-2028

March 2025

1. INTRODUCTION

1.1 Where people commit fraud against the public sector and public services, they take money away from the services on which the public depend on, and damage citizens' trust in the government. The Borough Council of King's Lynn and West Norfolk (the Council) is committed to protecting the public funds entrusted to it and to upholding the highest standards of financial probity and accountability. We cannot afford to be complacent, and we urge all our members, employees, contractors, and partners to assist us in tackling fraud by having regard to this policy and the risks of fraud when carrying out their duties, recognising that, if uncontrolled, fraud diverts much needed resources from our communities.

1.2 The "Annual Fraud Indicator 2023" produced by Crowe Clark Whitehall estimated that annual UK fraud losses could be £219 billion, with Public Sector fraud losses estimated to be £50.2 billion. The Government's "Economic Crime Plan 2023-2026" states that Fraud accounted for an estimated 41% of all crime experienced by adults in England and Wales in the year ending September 2022. Fraud is now the most common offence in the UK and local authorities continue to face significant fraud challenge, exacerbated by the Covid-19 pandemic and the ongoing cost-of-living crisis. Economic crime refers to a broad category of activity involving money, finance or assets, the purpose of which is to unlawfully obtain a profit or advantage for the perpetrator or cause loss to others. This poses a threat to the UK's economy and its institutions and causes serious harm to society and individuals. It includes activity which:

- Allows criminals to benefit from the proceeds of their crimes or fund further criminality,
- Damages our financial systems and harms the interests of legitimate business,
- Undermines the integrity of the UK's position as an international finance centre, and
- Poses a risk to the UK's prosperity, national security, and reputation.

1.3 This strategy recognises that the terms "fraud" and "corruption" form part of a much wider agenda, but the strategy has not been re-titled "economic crime"; however, acknowledging this enables us to have an awareness and provide a holistic response to the following types of criminality:

- Fraud against the individual, private sector, and public sector,
- Terrorist financing,
- Sanctions contravention,
- Market abuse,
- Corruption and bribery,
- The laundering of proceeds of all crimes.

1.4 This strategy along with the policies in place detail the Council's arrangements for managing the risk of fraud and corruption. We are committed to reducing losses from fraud by using an integrated approach which encompasses the Fighting Fraud and Corruption Locally (FFCL) 2020's standards of:

- Governance (accountability, leadership, awareness, strategy, resources, authority, and independence),
- Operations (capability & competency, risk assessment, intelligence & data, collaboration, prevention, investigation, and redress), and
- Reporting (measurement, transparency, and monitoring).

1.5 The threat and risks of fraud and corruption are ever evolving and can quickly develop into new and complex fraud attacks and as such our response to countering fraud needs to be dynamic as developments in technology, social change and other factors create new challenges.

2. OVERVIEW

2.1 This strategy outlines the approach to combat fraud, corruption, and money laundering within the Council. The aim is to create efficient, self-sustainable, and cost-effective systems and processes which enhance organisational value and serves as a deterrent to fraudulent activities. This strategy includes the current legislative and regulatory framework that the Council should consider within it:

➢ **<u>Core Fraud and Corruption Legislation</u>**

a) **Fraud Act 2006** – Establishes offences of fraud by false representation, failure to disclose, and abuse of position.

b) **The Bribery Act 2010** – Covers bribing, being bribed, bribery of foreign public officials, and failure to prevent bribery.

c) **Theft Acts 1968 and 1978** – Cover theft, false accounting, and dishonesty offences.

d) **Proceeds of Crime Act 2002 (POCA)** – Allows recovery of criminal proceeds and introduces offences of money laundering.

➢ **<u>Local Authority-Specific and Sector-Specific Legislation</u>**

a) **Council Tax Reduction Schemes (Detection of Fraud and Enforcement) (England) Regulations 2013** – Provides councils with powers to investigate and prosecute fraud related to council tax reduction schemes.

b) **Prevention of Social Housing Fraud Act 2013** – Criminalises tenancy fraud and gives local authorities powers to investigate and recover social housing.

c) **Local Government Act 1972 (Section 151)** – Requires councils to ensure proper financial administration and protect public funds.

d) **Local Government Act 2000** – Establishes ethical frameworks, codes of conduct for members, and promotes governance standards.

➢ Criminal Procedure and Investigation Framework

a) **Police and Criminal Evidence Act 1984 (PACE)** – Sets out powers and safeguards for the collection of evidence in criminal investigations, ensuring legality and proportionality.

b) **Criminal Procedure and Investigations Act 1996 (CPIA)** – Governs disclosure obligations and requires councils to manage investigation material systematically.

➢ Surveillance and Investigation Powers

a) **Regulation of Investigatory Powers Act 2000 (RIPA)** – Regulates covert surveillance and the use of covert human intelligence sources (CHIS) by councils.

b) **Investigatory Powers Act 2016** – Extends surveillance powers and data retention obligations for law enforcement and certain public bodies.

➢ Economic Crime and Corporate Governance

a) **Economic Crime and Corporate Transparency Act 2023** – Introduces new powers for tackling economic crime, enhanced corporate transparency obligations, and strengthens authorities' ability to act against financial crime.

b) **Criminal Finances Act 2017** – Introduces corporate offences for failing to prevent the facilitation of tax evasion.

➢ Data, Privacy, and Transparency

a) **Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR)** – Sets standards for processing and storing personal data, relevant to investigation and fraud detection activities.

b) **Freedom of Information Act 2000** – Requires councils to disclose information unless exempt, balancing transparency with confidentiality needs during investigations.

c) **Local Government Transparency Code 2015** – Mandates the publication of information on counter-fraud work and enforcement action.

➢ Human Rights and Ethical Standards

a) **Human Rights Act 1998 and European Convention on Human Rights (ECHR)** – Ensures fraud and corruption investigations are lawful, proportionate, and respect individuals' rights under the ECHR.

b) **Equality Act 2010** – Ensures equality and non-discrimination principles in all actions, including investigation and enforcement.

➢ Governance and Best Practice Standards

a) Accounts and Audit Regulations 2015 – Requires councils to maintain effective internal controls, risk management, and arrangements for preventing and detecting fraud.

b) CIPFA Code of Practice on Managing the Risk of Fraud and Corruption (2014) – Industry-standard guidance on managing fraud risk within public sector bodies.

c) CIPFA/SOLACE Delivering Good Governance Framework (2016) – Establishes best practice for good governance, including counter-fraud principles.

d) Government Counter Fraud Functional Standard (GovS 013) – Sets out required standards for public sector organisations in countering fraud.

e) National Fraud Initiative (NFI) and Norfolk FraudHub – Data-matching exercises run by the Cabinet Office to identify fraud and error in public sector spending.

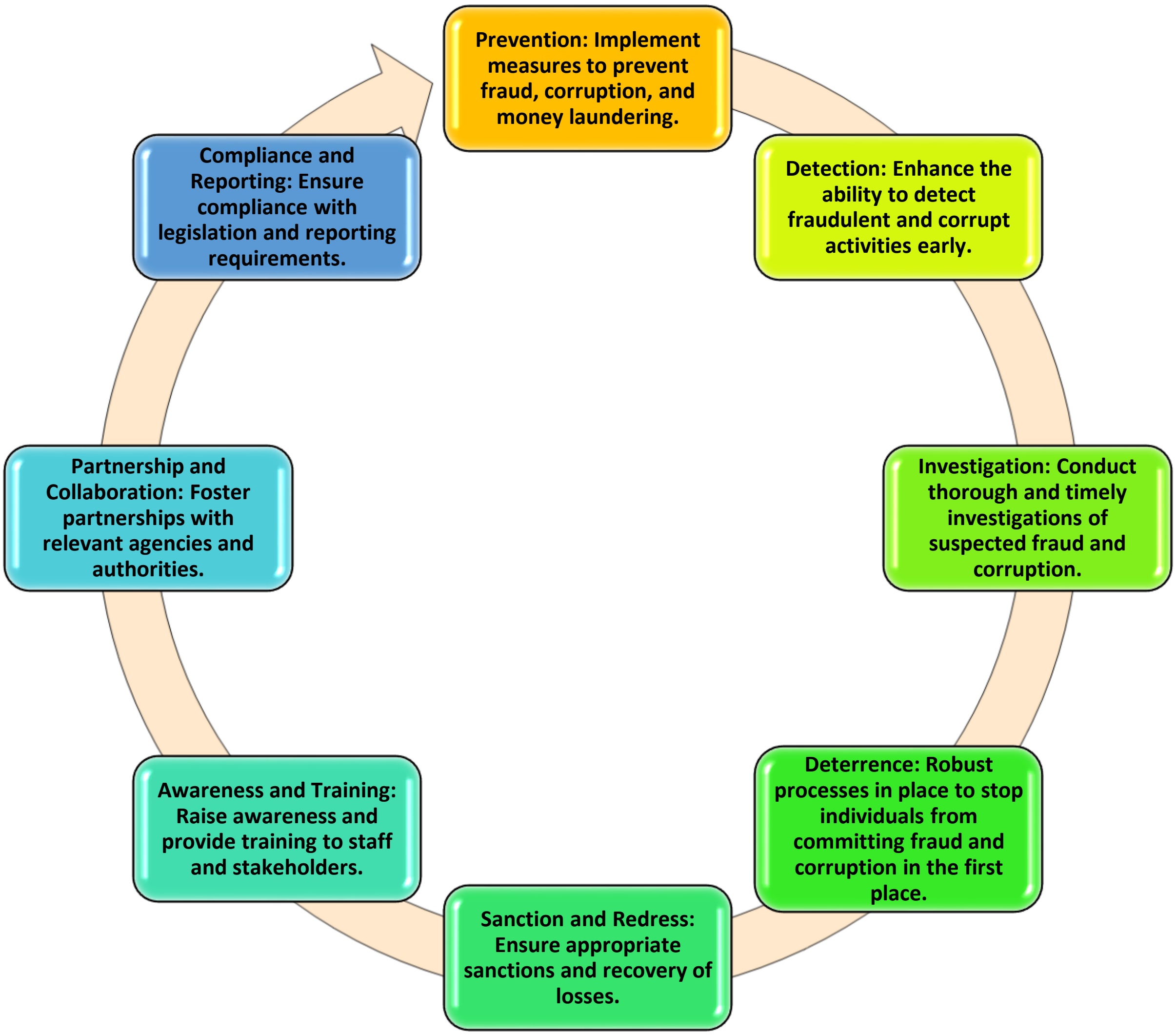
f) Fighting Fraud and Corruption Locally 2020s – The counter fraud and corruption strategy for local government. It provides a blueprint for a coordinated response to fraud and corruption perpetrated against local authorities.

2.2 The Council is committed to embedding its anti-fraud and anti-corruption policies and procedures within all areas of governance, service delivery, financial management, and procurement processes, as such this strategy takes into account the following:

- ✓ Anti-Fraud & Anti-Corruption Policy
- ✓ Whistleblowing Policy
- ✓ Anti-Money Laundering Policy
- ✓ Financial Regulations

A further policy is being developed alongside this strategy “Anti-Bribery Policy”.

3. STRATEGIC AIMS



4. FRAUD RISK ASSESSMENT (CONCLUDED NOVEMBER 2024)

Service Area	Fraud Awareness	Asset Misappropria-tion	Financial Reporting	Non-Financial Reporting	Regulatory Compliance	Illegal Acts	Bribery & Corruption	Fraud Prevention Procedures	Pre-employment Screening	Other Controls	Money Laundering & POCA
Planning / CIL	Adequate	Adequate	N/A	Excellent	Strong	Adequate	Basic	Basic	N/A	Excellent	Adequate
Environmental Quality	Adequate	Adequate	N/A	Strong	Strong	Adequate	Adequate	Strong	N/A	Excellent	Adequate
Environment & Planning Support	Adequate	Adequate	N/A	Strong	Strong	Adequate	Basic	Basic	N/A	Excellent	Adequate
Planning Policy	Adequate	Basic	N/A	Strong	Strong	Adequate	Basic	Adequate	N/A	Adequate	N/A
Democratic Services	Adequate	Strong	N/A	Adequate	Strong	Adequate	Adequate	Poor	N/A	Adequate	N/A
CIC	Strong	Strong	N/A	Strong	Strong	Adequate	Basic	Adequate	N/A	Strong	Adequate
Personnel Services	Adequate	Adequate	N/A	Strong	Strong	Adequate	Adequate	Strong	Strong	Excellent	Adequate
Corporate Policy	Adequate	Adequate	N/A	Adequate	Adequate	N/A	Poor	Basic	N/A	Adequate	N/A
Communications	Adequate	Adequate	N/A	Adequate	Adequate	Adequate	Adequate	Adequate	N/A	Adequate	N/A
Legal Services	Strong	Strong	N/A	Adequate	Strong	Adequate	Adequate	Adequate	N/A	Basic	Basic
Licensing	Adequate	Strong	N/A	Adequate	Adequate	Adequate	Adequate	Adequate	N/A	Strong	N/A
Corporate Governance	Adequate	Adequate	N/A	Strong	Strong	Adequate	Adequate	Basic	N/A	Adequate	N/A
Climate Change	Strong	Adequate	N/A	Strong	Strong	Adequate	Strong	Adequate	N/A	Adequate	N/A
Corporate Projects	Strong	Strong	N/A	Strong	Basic	Adequate	Basic	Strong	N/A	Strong	N/A
Procurement	Strong	Strong	N/A	Adequate	Adequate	Adequate	Adequate	Strong	N/A	Basic	Adequate
Housing Needs & Allocations	Strong	Strong	N/A	Strong	Adequate	Adequate	Adequate	Strong	N/A	Strong	Adequate
Strategic Housing	Adequate	Adequate	N/A	Strong	Strong	Adequate	Adequate	Adequate	N/A	Strong	Adequate
Food and Health & Safety	Strong	Strong	N/A	Adequate	Basic	Strong	Adequate	Adequate	N/A	Strong	N/A
Careline Community Service	Adequate	Strong	N/A	Adequate	Adequate	Adequate	Strong	Adequate	N/A	Strong	Strong
Repairs and Adaptations (including Handyperson Service)	Adequate	Strong	N/A	Strong	Adequate	Basic	Basic	Adequate	N/A	Adequate	Adequate
Housing Standards	Adequate	Strong	N/A	Strong	Strong	Basic	Basic	Adequate	N/A	Strong	Adequate
CSNN / Enviro Crime / ASB / Help Hub	Adequate	Strong	N/A	Adequate	Adequate	Basic	Adequate	Adequate	N/A	Strong	Adequate
Public Open Space	Adequate	Adequate	N/A	Poor	Adequate	Basic	Adequate	Adequate	N/A	Adequate	N/A
Waste Management	Adequate	Adequate	N/A	Adequate	Adequate	Basic	Basic	Basic	N/A	Adequate	Adequate
Crematorium & Cemeteries	Poor	Adequate	N/A	Strong	Strong	Basic	Adequate	Adequate	N/A	Strong	N/A
CCTV	Strong	Adequate	N/A	Adequate	Strong	Adequate	Basic	Adequate	N/A	Adequate	N/A
Resort Services & Parking Operations (inc. Civil Enforcement)	Strong	Adequate	N/A	Strong	Strong	Adequate	Adequate	Adequate	N/A	Strong	N/A
Property and Projects	Excellent	Adequate	N/A	Adequate	Excellent	Strong	Adequate	Adequate	N/A	Adequate	Strong
Finance	Excellent	Adequate	Strong	Basic	Adequate	Adequate	Adequate	Adequate	N/A	Strong	Adequate
ICT	Strong	Adequate	N/A	Basic	Basic	Poor	Poor	Poor	N/A	Adequate	N/A
Revenues	Excellent	Strong	N/A	Strong	Excellent	Strong	Strong	Adequate	N/A	Excellent	Adequate
Benefits	Excellent	Adequate	N/A	Strong	Excellent	Strong	Strong	Adequate	N/A	Excellent	Adequate
Internal Audit & Fraud	Strong	Adequate	N/A	Strong	Strong	Strong	Strong	Strong	N/A	Excellent	Adequate
Alive West Norfolk	Adequate	Adequate	N/A	Excellent	Strong	Basic	Strong	Basic	N/A	Excellent	Strong

4.1 During 2024, a corporate wide fraud risk assessment was undertaken of which the results are shown above. Fraud risk and compliance elements have been assessed based upon the responses returned from all services and functions (34 responses were returned out of 36 across the council – 94.44%).

4.2 The Bribery Act 2010 and the Economic Crime and Corporate Transparency Act 2023 introduced specific standards and requirements in respect of anti-bribery measures and “reasonable fraud prevention procedures”. The standards require “adequate” (in terms of anti-bribery) and “reasonable” (in terms of fraud prevention procedures) controls to be in place. For the purposes of the assessment undertaken these terms are one and the same.

4.3 Therefore, the overall assessment of the organisation is that there are many adequate/reasonable controls in place; however, there are some suggested best practices to consider. Specifically, these are as follows:

- Staff are encouraged to undertake the available e-learning fraud awareness training at regular intervals.
- Service areas are encouraged to effectively communicate fraud risks to raise awareness.
- Where assets are held within service areas, it is encouraged to introduce inventory tracking and periodic inventory checks.
- Where non-financial reporting is in place, ensure a consistent validation process to improve reliability and outputs are produced by trained staff to ensure accurate reporting.
- Raising awareness of illegal acts specific to service areas through policies, procedures with line managers promoting ethical culture aligned to the “*Seven Principles of Public Life*” and internal Codes of Conduct.
- Regular risk assessments within service areas for illegal activities, with mitigation strategies in place.
- Raising awareness of the whistleblowing reporting mechanisms across the council.
- The introduction of an Anti-Bribery Policy (a draft has now been produced).
- Introduce “Declaration of Interests” and “land ownership” declarations.
- The introduction of anti-bribery e-learning training across the organisation.
- Monitoring and compliance checks in respect of gifts, gratuities and hospitality.
- Maintaining separation of duties, financial oversight, and refreshing fraud awareness and whistleblowing training for staff.
- Conducting corporate wide fraud risk assessments on a frequent basis.
- Leadership actively promoting fraud awareness and ensuring the policies and procedures are maintained and integrated into the corporate governance framework.
- Networking and professional membership subscriptions to maintain working knowledge of relevant changes in legislation, regulations and emerging risks.

4.4 The Fraud Risk Assessment has furthermore highlighted services and functions where there is a need to consider Anti-Money Laundering preventative procedures and processes. A total of 19 of the 34 areas that responded were involved in activities that could be susceptible to money laundering activities. The key areas where the council could be affected by money laundering activities are:

- Paying out any recoverable loans or grants,
- Receiving cash payments of £1,000 or more,
- Having the potential to pay out refunds of £1,000 or more.

The areas highlighted within the Fraud Risk Assessment should therefore receive Anti-Money Laundering training and regular refresher training, alongside this effective procedures should be maintained when dealing with such transactions across the organisation. The Council has an Anti-Money Laundering Policy and Procedures in place and relevant staff should familiarise themselves with these. Additional controls can be introduced to reduce risks around refund processes (a recent procedure has been produced for the Revenues Department that can be considered good practice).

4.5 In addition to these controls, maintaining the annual subscription to the National Anti-Fraud-Network provides valuable resource across the organisation to various intelligence checks. New checks are being made available as enhancements in digital and technology occur, such as the new bank account verification service available to check both consumers and suppliers bank details and verify that they relate to the consumer/supplier being presented.

Failing to Prevent Fraud: Avoiding Corporate Criminal Liability

4.6 The Economic Crime and Corporate Transparency Act 2023 (the Act) received Royal Assent on 26 October 2023. While the Act is now law, not all changes will take effect immediately and are to be rolled out gradually under a government implementation timetable. The offence will come into effect on 1 September 2025. Central government guidance was published in November 2024, which can be found on the following webpage - https://www.gov.uk/government/news/new-failure-to-prevent-fraud-guidance-published, that outlined the following reasonable fraud prevention procedures need to be in place:

i. Top level commitment
ii. Risk Assessment
iii. Proportionate risk-based fraud prevention procedures
iv. Due Diligence
v. Communication
vi. Monitoring and Review

i. Top level commitment

Responsibility for the prevention and detection of fraud rests with those charged with the governance of the organisation. The board of directors, partners and senior management of a relevant body should be committed to preventing associated persons from committing fraud. They should foster a culture within the organisation in which fraud is never acceptable and should reject profit based on, or assisted by, fraud.

Senior management have a leadership role in relation to fraud prevention. The level and nature of their involvement will vary depending on the size and structure of the relevant body, but their role is likely to include:

- Communication and endorsement of the organisation's stance on preventing fraud, including mission statements.
- Ensuring that there is clear governance across the organisation in respect of the fraud prevention framework.
- Commitment to training and resourcing.
- Leading by example and fostering an open culture, where staff feel empowered to speak up if they encounter fraudulent practices.

ii. Risk Assessment

The organisation assesses the nature and extent of its exposure to the risk of employees, agents and other associated persons committing fraud in scope of the offence. The risk assessment is dynamic, documented and kept under regular review.

Relevant organisations may already undertake a range of risk assessments relating to fraud and other economic crime. In this case, organisations may find it most effective to extend their existing risk assessments to include the risk of frauds in scope of this offence.

Since the definition of an associated person is wide, organisations may wish to start by identifying typologies of associated persons. For example: agents, contractors providing a particular service for or on behalf of the organisation, or staff in specific sensitive roles.

iii. Proportionate risk-based fraud prevention procedures

An organisation's procedures to prevent fraud by persons associated with it are proportionate to the fraud risks it faces and to the nature, scale and complexity of the organisation's activities. They are also clear, practical, accessible, effectively implemented and enforced.

The relevant body should draw up a fraud prevention plan, with procedures to prevent fraud being proportionate to the risk identified in the risk assessment.

It is a key principle that the fraud prevention plan should be proportionate to the risk and the potential impact. The level of prevention procedures considered to be reasonable should take account of the level of control and supervision the organisation is able to exercise over a particular person acting on its behalf and the relevant body's proximity to that person. For example, a relevant body is likely to have greater control over the conduct of an employee than that of an outsourced worker performing services on its behalf. Nonetheless, appropriate controls should be implemented via the relevant contract.

In some limited circumstances, it may be deemed reasonable not to introduce measures in response to a particular risk. Any decision made not to implement procedures to prevent a specific risk should be documented, together with the name and position of the person who authorised that decision and reviewed as appropriate.

Since the offence extends across organisations in all sectors of the economy, many of these businesses will also be subject to other regulations, for example, regulations concerning financial reporting, environmental, health and safety or competition matters. Processes for compliance with these regulations may address certain potential frauds (for example, robust processes for compliance with specific environmental regulations might reasonably be expected to prevent fraud by misrepresentation on the relevant environmental statements).

It is not necessary or desirable for organisations to duplicate existing work. Equally, it would not be a suitable defence to state that because the organisation is regulated its compliance processes under existing regulations would automatically qualify as "reasonable procedures" under the Economic Crime and Corporate Transparency Act.

To avoid duplication of work, organisations are advised to assess whether their existing regulatory compliance mechanisms, financial reporting controls and fraud prevention measures would be sufficient to prevent each of the fraud risks identified in the risk assessment. Where existing mechanisms appear to be insufficient, organisations should develop appropriate measures to prevent fraud.

iv. <u>Due Diligence</u>

The organisation applies due diligence procedures, taking a proportionate and risk-based approach, in respect of persons who perform or will perform services for or on behalf of the organisation, in order to mitigate identified fraud risks.

Relevant organisations in the sectors facing the greatest fraud risks may already undertake a wide variety of due diligence procedures, both mandatory and in response to risks associated with specific transactions or customers.

However, it should be noted that merely applying existing procedures tailored to a different type of risk will not necessarily be an adequate response to tackle the risk of fraud. Those with exposure to the greatest risk may choose to clearly articulate their due diligence procedures specifically in relation to the corporate offence.

Relevant organisations should conduct due diligence on associated persons (including new partners). Examples of best practice include:

- ✓ Using appropriate technology, for example, third-party risk management tools, screening tools, internet searches, checking trading history or professional or regulated status if relevant, or vetting checks if appropriate.
- ✓ Reviewing contracts with those providing services, to include appropriate obligations requiring compliance and ability to terminate in the event of a breach where appropriate.
- ✓ Reviewing contracts for agents.
- ✓ Monitoring of well-being of staff and agents to identify persons who may be more likely to commit fraud because of stress, targets or workload.

Relevant organisations should conduct due diligence in relation to mergers or acquisitions. Examples of best practice include:

- ✓ Using third party merger and acquisition tools.
- ✓ Assessment of any relevant criminal or regulatory charges.
- ✓ Assessment of tax documentation.
- ✓ Assessment of the firm's exposure to risk.
- ✓ Assessment of the firm's fraud detection and prevention measures (bearing in mind that if the firm being acquired does not qualify as a "large organisation" as set out in section 201, it may not have any procedures that directly address the offence of failure to prevent fraud).
- ✓ Integration of fraud prevention measures post-acquisition.

Relevant organisations may choose to conduct their due diligence internally, or externally, for example by consultants. The due diligence procedures put in place should be proportionate to the identified risk and kept under review as necessary.

v. Communication

The organisation seeks to ensure that its prevention policies and procedures are communicated, embedded and understood throughout the organisation, through internal and external communication. Training and maintaining training are key.

A clear articulation and endorsement of an organisation's policy against fraud deters those providing services for or on behalf of the relevant body from engaging in such activities. Communication should be from all levels within an organisation. It is not enough for the senior management to say that staff should not commit fraud, if middle management then actively ignore this and encourage junior members to circumvent the relevant body's fraud prevention procedures.

It is important that the relevant body ensures awareness and understanding of its policies amongst those who provide services for or on its behalf. The organisation may feel that it is necessary to require its representatives to undertake fraud-specific training, depending on the risks it is exposed to. This would be to ensure that they have the skills needed to identify when they and those around them might be at risk of engaging in an illegal act and what whistle-blowing procedures should be followed if this occurs.

It may be helpful to integrate fraud messaging into existing policies and procedures. For instance, policies related to sales targets or customer interactions could include a brief statement addressing fraud rationalisation and the potential consequences of committing fraud.

Organisations may also choose to publicise within the organisation the outcome of investigations, particularly the sanctions imposed.

vi. Monitoring and Review

The organisation monitors and reviews its fraud detection and prevention procedures and makes improvements where necessary. This includes learning from investigations and whistleblowing incidents and reviewing information from its own sector.

Full details of the government guidance can be found at:
https://assets.publishing.service.gov.uk/media/67868e29c6428e013188179c/Failure+to+Prevent+Fraud+Guidance+-+English+Language+v1.6.pdf

5. IMPLEMENTATION PLAN

5.1 Below is an outline of controls and oversight / governance arrangements that are in place or those that can be introduced to assist in the prevention, detection and deterrence of fraud, corruption and money laundering across the Council:

Prevention

Target Areas	Measures	Processes
Procurement & Contract Management	✓ Robust Policies: Maintain and enforce comprehensive procurement policies. ✓ Supplier Due Diligence: Conduct thorough vetting of suppliers to ensure legitimacy. ✓ Contract Management: Implement protocols for contract management with clear performance metrics and penalties for non-compliance.	✓ Regularly review procurement policies to ensure they are up-to-date. ✓ Perform due diligence checks on new suppliers before contracts are awarded. ✓ Monitor supplier performance through regular reviews and audits.
Payroll & Human Resources	✓ Audit Payroll Records: Conduct periodic audits to identify discrepancies. ✓ Controls Over Payroll: Maintain controls to ensure segregation of duties and authorisation protocols. ✓ Recruitment Procedures: Ensure hiring processes prevent false employee records	✓ Schedule regular payroll audits. ✓ Ensure payroll changes are authorised by multiple parties. ✓ Verify employee credentials during the hiring process.
Grant and Benefit Administration	✓ Verification Processes: Introduce stringent processes for verifying eligibility. ✓ Review and Audit: Regularly audit grant and benefit disbursements. ✓ Approval Guidelines: Establish clear guidelines for grant approvals	✓ Implement automated verification systems for grant and benefit applications. ✓ Schedule periodic audits of disbursement records. ✓ Train staff on approval processes and guidelines.
Financial Transactions and Accounting	✓ Internal Controls: Ensure strong controls over transactions and accounting records. ✓ Regular Reconciliations: Perform regular reconciliations and independent reviews. ✓ Secure Systems: Maintain secure electronic payment systems.	✓ Conduct monthly reconciliations of financial accounts. ✓ Perform independent reviews of financial statements periodically. ✓ Regularly update security protocols for payment systems.

Information Technology	✓ Cybersecurity: Maintain strong cybersecurity measures to protect data. ✓ Access Controls: Ensure strict access controls and audit IT systems regularly. ✓ Staff Training: Conduct regular training on cyber fraud prevention.	✓ Update and test cybersecurity measures periodically. ✓ Audit access logs and user activities regularly. ✓ Provide annual cybersecurity training for all staff.

Detection

Target Areas	Measures	Processes
Procurement & Contract Management	✓ Data Analytics: Use data analytics to monitor for anomalies. ✓ Compliance Audits: Conduct regular compliance audits. ✓ Supplier Performance Monitoring: Regularly review supplier performance.	✓ Implement analytics tools to detect irregular patterns. ✓ Schedule compliance audits periodically. ✓ Review supplier performance reports frequently.
Payroll & Human Resources	✓ Irregularity Detection: Use data analytics to identify payroll irregularities. ✓ Periodic Checks: Conduct periodic checks for ghost employees. ✓ Timesheet Monitoring: Monitor timesheets for discrepancies.	✓ Implement payroll analytics software. ✓ Conduct surprise checks on payroll records. ✓ Review timesheets frequently.
Grant and Benefit Administration	✓ Automated Flagging: Use systems to flag unusual claims. ✓ Programme Audits: Regularly audit grant and benefit programmes. ✓ Data Matching: Use data matching to verify claimant information.	✓ Implement automated fraud detection systems. ✓ Schedule audits of grant programmes periodically. ✓ Use data matching tools to cross-check claimant information.
Financial Transactions and Accounting	✓ Continuous Monitoring: Monitor transactions continuously using analytics. ✓ Surprise Audits: Conduct surprise audits of financial records. ✓ Unusual Transaction Monitoring: Monitor for unusual banking transactions.	✓ Set up real-time transaction monitoring systems. ✓ Conduct surprise financial audits periodically. ✓ Review banking transactions frequently.
Information Technology	✓ Intrusion Detection: Employ intrusion detection systems. ✓ Security Audits: Conduct regular IT security audits. ✓ User Activity Monitoring: Monitor user activity for unusual behaviour.	✓ Implement and regularly update intrusion detection systems. ✓ Schedule IT security audits periodically. ✓ Monitor and review user activity logs frequently.

Deterrence

Target Areas	Measures	Processes
Procurement & Contract Management	✓ Publicise Successes: Publicise successful fraud prevention cases. ✓ Strict Penalties: Enforce strict penalties for procurement fraud. ✓ Transparency: Promote transparency in procurement processes.	✓ Issue regular reports on successful fraud prevention cases. ✓ Apply penalties consistently and visibly. ✓ Ensure procurement processes are open and transparent.
Payroll & Human Resources	✓ Zero-Tolerance Policy: Communicate zero-tolerance policies for fraud. ✓ Training: Provide regular training on ethical behaviour. ✓ Disciplinary Actions: Enforce disciplinary actions for fraud.	✓ Issue regular reminders about zero-tolerance policies. ✓ Conduct periodical ethics training sessions. ✓ Apply disciplinary actions consistently and fairly.
Grant and Benefit Administration	✓ Public Awareness: Run public awareness campaigns on fraud consequences. ✓ Strict Penalties: Enforce penalties for fraudulent claims. ✓ Transparency: Promote transparency in grant and benefit administration.	✓ Launch periodical public awareness campaigns. ✓ Consistently apply penalties for fraudulent claims. ✓ Ensure transparency in the administration process.
Financial Transactions and Accounting	✓ Visible Controls: Implement visible internal controls. ✓ Communication: Communicate the consequences of financial fraud. ✓ Code of Conduct: Regularly update and enforce the code of conduct.	✓ Conduct regular reviews of internal controls. ✓ Issue regular communications on fraud consequences. ✓ Update and distribute the financial regulations and code of conduct annually.
Information Technology	✓ Publicise Measures: Publicise cybersecurity measures. ✓ Strict Penalties: Enforce strict penalties for IT security breaches. ✓ Cyber Vigilance: Promote a culture of cyber vigilance.	✓ Regularly communicate about cybersecurity measures. ✓ Consistently apply penalties for IT breaches. ✓ Conduct regular cybersecurity awareness campaigns.

6. ANTI-FRAUD AND ANTI-CORRUPTION CULTURE AND AWARENESS

6.1 Building a Strong Culture:

1. Leadership Commitment: Senior management must lead by example, demonstrating zero tolerance for fraud and corruption.
2. Ethical Standards: Promote and enforce high ethical standards and integrity throughout the council.
3. Open Communication: Foster an environment where employees feel safe to report suspicious activities without fear of retaliation.

6.2 Awareness Initiatives:

1. Regular Training: Conduct regular training sessions for all staff on recognising and preventing fraud and corruption.
2. Communication Campaigns: Use internal newsletters, emails, and intranet updates to keep staff informed about anti-fraud measures.
3. Workshops and Seminars: Organise workshops and seminars to discuss real-life cases and best practices.

7. COMMUNICATION STRATEGY FOR STAKEHOLDERS

Internal Stakeholders	Communication Strategy
Staff	✓ Regular Updates: Provide regular updates on anti-fraud policies and procedures through emails and intranet. ✓ Training Programs: Implement mandatory training programs on fraud awareness and prevention. ✓ Feedback Mechanism: Establish a feedback mechanism for staff to voice concerns or suggestions regarding anti-fraud measures.
Senior Management & Members	✓ Reports and Briefings: Deliver regular reports and briefings on the status of anti-fraud measures and incidents. ✓ Strategic Involvement: Involve senior management in strategic decisions related to fraud prevention and response.

External Stakeholders	Communication Strategy
Partners and Contractors	✓ Clear Communication: Communicate anti-fraud policies and expectations to all partners and contractors. ✓ Due Diligence: Conduct thorough due diligence on all partners and contractors to ensure compliance with anti-fraud policies. ✓ Contractual Obligations: Include anti-fraud clauses in contracts with partners and contractors, outlining expectations and consequences of non-compliance.
Suppliers	✓ Regular Communications: Provide suppliers with information on the authority's anti-fraud measures and expectations. ✓ Training and Workshops: Offer training sessions and workshops to suppliers on detecting and preventing fraud. ✓ Audits and Reviews: Conduct regular audits and reviews of supplier performance and adherence to anti-fraud policies.
Public and Beneficiaries	✓ Public Awareness Campaigns: Run campaigns to educate the public about the consequences of fraud and the importance of reporting suspicious activities. ✓ Accessible Reporting Channels: Ensure there are accessible and confidential channels for the public to report fraud. ✓ Transparency: Maintain transparency about the authority's efforts to combat fraud, including publishing statistics and outcomes of anti-fraud activities.
Regulatory Bodies	✓ Regular Reporting: Ensure timely and accurate reporting to regulatory bodies as required by law. ✓ Collaboration and Information Sharing: Foster partnerships with external agencies and participate in information-sharing networks to enhance fraud detection and prevention efforts. ✓ Compliance Audits: Engage in regular compliance audits to ensure adherence to all relevant legislation and regulations.

8. CONCLUSION

8.1 Implementing this comprehensive strategy will create a robust framework for combating fraud, corruption, and money laundering within the Council that will ensure compliance with legislation and regulations. By targeting specific areas with tailored prevention, detection, and deterrence measures, the authority can significantly reduce risks, protect public funds, maintain public trust, and enhance organisational value. The involvement of technology and collaboration with external agencies will further ensure a focused and effective anti-fraud and anti-corruption strategy.

The strategy's success depends on building a strong anti-fraud culture, raising awareness among all stakeholders, and maintaining clear and open communication channels. This holistic approach will not only safeguard the council's assets but also reinforce its reputation for integrity and accountability.

Audit Committee Work Programme 2026 – 2027

DATE OF MEETING	TITLE	TYPE OF REPORT	LEAD OFFICER	OBJECTIVES AND DESIRED OUTCOMES
15th June 2026	Appointment of Vice Chair for the Municipal Year 2025/2026	Operational	Democratic Services Officer	To appoint a Vice Chair for the Municipal Year 2025/2026.
	External Auditors - 2024/25 Auditors Annual Report		EY – D Riglar	
	External Auditors - 2025/26 Audit Plan		EY – D Riglar	
	Cabinet Forward Decisions List			To identify any items to be considered by the Audit Committee.
	Draft 2026 Annual Governance Statement		Charlotte Marriott	To consider the draft AGS
	2026-2027 Corporate Risk register update		Debbie Ess	To report progress and update on the Risk Register.
	Annual Internal Audit Progress Report		Teresa Sharman	The Audit Committee receive updates on progress made against the annual Internal Audit Plan. This report forms part of the overall reporting requirements to assist the Council in discharging its responsibilities in relation to the internal audit activity.
	Annual internal Audit Opinion Report		Teresa Sharman	This report concludes on the Internal Audit Activity undertaken during the prior year, provides an annual opinion concerning the organisation's framework of governance, risk management and control, concludes

				on the effectiveness of internal audit and provides key information for the Annual Governance Statement.
	Work Programme 2026/2027			To identify any items for the work programme.
14th September 2026				
	Appointment for Vice – Chair for Municipal Year 2026/2027	Operational	Democratic Services Officer	To appoint a Vice Chair for the Municipal Year 2025/2026.
	Work Programme 2026/2027			To identify any items for the work programme.
	Cabinet Forward Decisions List			To identify any items to be considered by the Audit Committee.
	Annual Treasury Outturn Report 2025/2026		Carl Holland	The Council must make an annual review of its Treasury operation for the previous year, as part of the CIPFA code of Practice.
	Anti Fraud and Corruption Action Plan Update		Carl Holland	Fraud and Error reports are to be presented by Internal Audit to the Audit Committee routinely, to ensure the Council maintains compliance with the Anti-Fraud & Anti-Corruption Policy and associated regulation.

16th November 2026				
	Work Programme 2026/2027			To identify any items for the work programme.
	Cabinet Forward Decisions List			To identify any items to be considered by the Audit Committee.
	Audit Briefing – Local Audit Rest		EY - David Riglar	To inform the Audit Committee with additional context and wider section position.
	2026-2027 Corporate Risk register update		Debbie Ess	To report progress and update on the Risk Register.
	Half year Internal Audit Progress Update		Teresa Sharman	The Audit Committee receive updates on progress made against the annual Internal Audit Plan. This report forms part of the overall reporting requirements to assist the Council in discharging its responsibilities in relation to the internal audit activity.
	Annual Treasury Quarter 2 Monitoring Report		Carl Holland	The Council has formally adopted the Chartered Institute of Public Finance and Accountancy's (CIPFA) Code of Practice on Treasury Management (revised 2021) and remains fully compliant with its requirements. One of the primary requirements of the Code is, receipt by Audit Committee of a Quarterly Review Report.
	Business Continuity Annual update		Michelle Drewery	To provide an annual update.

	Annual Governance Statement Action Plan		Charlotte Marriott	To report the action plan on the Annual Governance Statement to the Committee
	Annual Report to Audit Committee on Wholly Owned Companies		Charlotte Marriott	To report on the performance on West Norfolk Housing Company and West Norfolk Property Limited
	Annual Governance Statement 2025/26 Significant and Operational Actions Progress Update		Charlotte Marriott	To report to the Committee on operational progress on the 2025/26 AGS.
January 2027				
	Final 2025/26 Annual Governance Statement		Charlotte Marriott	To approve the final 2026 annual governance statement.
	Statement of Accounts		Carl Holland	To report the final Statement of Accounts with the Annual Governance Statement.
	External Auditors Report	EY	D Riglar	To report the External Audit Report.
15th February 2027				
	2026-2027 Corporate Risk register update		Debbie Ess	To report progress and update on the Risk Register.
	Annual Treasury Quarter 3 Monitoring Report		Carl Holland	The Council has formally adopted the Chartered Institute of Public Finance and Accountancy's (CIPFA) Code of Practice on Treasury Management (revised 2021) and remains fully compliant with its requirements. One of the primary requirements of the Code is, receipt by Audit Committee of a Quarterly Review Report.

	Audit Committee Self Assessment Review and Action Plan		Teresa Sharman	To report on the outcomes from the Audit Committee Self-Assessment Review.
	Work Programme 2026/2027			To identify any items for the work programme.
	Cabinet Forward Decisions List			To identify any items to be considered by the Audit Committee.

Borough Council of
King's Lynn &
West Norfolk

Forward Decisions List

The Forward Decision List outlines the Cabinet's upcoming decisions over the next few months. It specifies which decisions are considered significant and indicates those that may lead to portions of the meeting being conducted in private. In addition, the list highlights the responsible Lead Officer and Portfolio Holder.

This document will be updated and republished on the Council's website each month. Any queries relating to the Forward Decision List should be forwarded to Democratic Services: Democratic.Services@West-Norfolk.gov.uk

What is a Key Decision?

Key decisions are defined as an executive decision which is likely:

(a) To result in the local authority incurring expenditure which is, or the making of savings which are, significant having regard to the Council's budget for the service or function to which the decision relates, or (significant relates to £500,000 or more)

(b) To be significant in terms of its effect on communities living or working in the area comprising two or more wards and electoral divisions in the Council's areas. (significant relates to one third of the population in a ward).

The key decision and non-key decision process is only for decisions made by the Executive, i.e. not those made at Planning, Council, Licensing etc. When assessing whether or not a decision is a key decision the decision maker must consider all the circumstances of the case. However, a decision which results in a significant amount spent or saved will generally be considered to be a key decision.

Why might a decision be made in private?

Members of the public may be excluded from a meeting or information if the nature of the business to be discussed is likely to involve the disclosure of exempt information such as details that could identify an individual or pertain to the financial or commercial interests of a person or organisation. Such information should only be made exempt, if it is in the public interest to do so under Schedule 12A of the Local Government Act 1972.

Borough Council of
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Cabinet Members:

Councillor Alistair Beales: Leader
Councillor Simon Ring: Deputy Leader and Portfolio Holder for Business
Councillor Jim Moriarty: Portfolio Holder for Planning and Licensing
Councillor Sandra Squire: Portfolio Holder for Environmental and Coastal
Councillor Michael de Whalley: Portfolio Holder for Climate Change and Biodiversity
Councillor Chris Morley: Portfolio Holder for Finance
Councillor Jo Rust: Portfolio Holder for People and Communities
Councillor Sue Lintern: Portfolio Holder for Culture and Events
Councillor Josie Ratcliffe: Portfolio Holder for Transport Strategy and Car Parking

Cabinet Members can be contacted directly and their contact details can be found via our website: [Committee details - Cabinet]

Senior Management

Kate Blakemore: Chief Executive
Michelle Drewery: Deputy Chief Executive and Section 151 Officer
Emma Kavanagh: Chief Operating Officer
Emma Hodds: Chief of Staff and Monitoring Officer
Siobhan Cleeve: Interim Assistant Director Leisure and Culture
Stuart Ashworth: Assistant Director Environment and Planning
Liz MacDonald: Assistant Director Property & Projects
Martin Chisholm: Assistant Director Operations & Commercial
Duncan Hall: Assistant Director Regeneration, Housing & Place
Carl Holland: Assistant Director for Finance and Deputy Section 151 Officer
Honor Howell: Strategic Lead to the Chief Executive and Leader
Paul Lowes: Assistant Director Corporate Services
Mark Whitmore: Assistant Director, Health, Wellbeing and Public Protection

Members of the Senior Management team can be contacted directly via esteam@west-norfolk.gov.uk

Borough Council of King's Lynn & West Norfolk

SEPTEMBER 2026						
Date of meeting	**Report title**	**Key or Non-Key Decision**	**Decision Maker**	**Cabinet Member/Portfolio**	**Lead Officer**	**Open or Exempt**
08 September 2026	Business Improvement District - Business Plan	Key	Cabinet	Deputy Leader and Cabinet Member for Business	Assistant Director, Regeneration, Housing & Place (Duncan Hall)	Open
08 September 2026	Budget Monitoring Quarter 1	Non	Cabinet	Cabinet Member for Finance	Assistant Director, Finance and Deputy Section 151 Officer (Carl Holland)	Open
08 September 2026 24 September 2026	Future Swimming Provision for West Norfolk	Key	Cabinet Council	Deputy Leader and Cabinet Member for Business	Strategic Advisor to the CEO and Leader (Honor Howell)	Open
08 September 2026	Corporate Performance Monitoring Quarter 1	Non	Cabinet	Leader of the Council	Chief of Staff and Monitoring Officer (Emma Hodds)	Open
08 September 2026 24 September 2026	Appointment of Honorary Aldermen	Non	Cabinet Council	Leader of the Council	Chief Executive (Kate Blakemore)	Open

OCTOBER 2026

Date of meeting	Report title	Key or Non-Key Decision	Decision Maker	Cabinet Member/Portfolio	Lead Officer	Open or Exempt
13 October 2026	Shareholder Committee Terms of Reference	Non	Cabinet	Leader of the Council	Chief of Staff and Monitoring Officer (Emma Hodds)	Open
13 October 2026 29 October 2026	National Planning Scheme of Delegation	Non	Council Cabinet	Cabinet Member for Planning and Licensing	Assistant Director, Environment and Planning (Stuart Ashworth)	Open
13 October 2026 29 October 2026	King's Lynn Masterplan and Parking Strategy	Key	Council Cabinet	Deputy Leader and Cabinet Member for Business	Assistant Director, Regeneration, Housing & Place (Duncan Hall)	Open

NOVEMBER 2026

Date of meeting	Report title	Key or Non-Key Decision	Decision Maker	Cabinet Member/Portfolio	Lead Officer	Open or Exempt
17 November 2026 03 December 2026	Hunstanton Masterplan and Parking Strategy	Key	Council Cabinet	Deputy Leader and Cabinet Member for Business	Assistant Director, Regeneration, Housing & Place (Duncan Hall)	Open

17 November 2026	Budget Monitoring Quarter 2	Non	Cabinet	Cabinet Member for Finance	Assistant Director, Finance and Deputy Section 151 Officer (Carl Holland)	Open
17 November 2026 03 December 2026	Council Tax Support Scheme for Working Age people for 2027/2028	Key	Council Cabinet	Cabinet Member for Finance	Assistant Director, Finance and Deputy Section 151 Officer (Carl Holland)	Open
17 November 2026	Corporate Performance Monitoring Quarter 2	Key	Cabinet	Leader of the Council	Chief of Staff and Monitoring Officer (Emma Hodds)	Open

JANUARY 2027

Date of meeting	Report title	Key or Non-Key Decision	Decision Maker	Cabinet Member/Portfolio	Lead Officer	Open or Exempt
19 January 2027	Housing Delivery Strategy	Key	Cabinet	Cabinet Member for People and Communities	Assistant Director, Regeneration, Housing & Place (Duncan Hall)	Open

FEBRUARY 2027

Borough Council of King's Lynn & West Norfolk

Date of meeting	Report title	Key or Non-Key Decision	Decision Maker	Cabinet Member/Portfolio	Lead Officer	Open or Exempt
03 February 2027 25 February 2027	Medium Term Financial Strategy 2026-2031	Key	Council Cabinet	Cabinet Member for Finance	Assistant Director, Finance and Deputy Section 151 Officer (Carl Holland)	Open
03 February 2027 25 February 2027	Capital Programme 2026-2030	Key	Council Cabinet	Cabinet Member for Finance	Assistant Director, Finance and Deputy Section 151 Officer (Carl Holland)	Open
03 February 2027 25 February 2027	Treasury Management Strategy	Key	Council Cabinet	Cabinet Member for Finance	Assistant Director, Finance and Deputy Section 151 Officer (Carl Holland)	Open
03 February 2027 25 February 2027	Capital Strategy	Key	Council Cabinet	Cabinet Member for Finance	Assistant Director, Finance and Deputy Section 151 Officer (Carl Holland)	Open
MARCH 2027						

Borough Council of King's Lynn & West Norfolk

Date of meeting	Report title	Key or Non-Key Decision	Decision Maker	Cabinet Member/Portfolio	Lead Officer	Open or Exempt
03 February 2027	Budget Monitoring Quarter 3	Non	Cabinet	Cabinet Member for Finance	Assistant Director, Finance and Deputy Section 151 Officer (Carl Holland)	Open
16 March 2027	Corporate Performance Monitoring Quarter 3	Key	Cabinet	Leader of the Council	Chief of Staff and Monitoring Officer (Emma Hodds)	Open

TO BE SCHEDULED

Date of meeting	Report title	Key or Non-Key Decision	Decision Maker	Cabinet Member/Portfolio	Lead Officer	Open or Exempt
	King's Lynn Conservation Area Appraisal and Management Plan	Non	Council, Cabinet	Cabinet Member for Planning and Licensing	Assistant Director, Environment and Planning (Stuart Ashworth)	Open
	Empty Homes Strategy Review	Key	Council	Cabinet Member for People and Communities	Assistant Director, Health, Wellbeing and Public Protection (Mark Whitmore)	Open
	Housing Assurance	Non	Council	Cabinet Member for People and Communities	Assistant Director, Health, Wellbeing and	Open

	Strategy				Public Protection (Mark Whitmore)	
	Domestic Abuse Tenants/Residents Policy and Domestic Abuse Intersectionality Policy	Non	Council	Cabinet Member for People and Communities	Assistant Director, Regeneration, Housing & Place (Duncan Hall)	Open
	IT Hardware Refresh	Key	Cabinet	Cabinet Member for Finance	Assistant Director, Corporate Services (Paul Lowes)	Fully exempt
	Heacham Beach Huts	Key	Cabinet	Deputy Leader and Cabinet Member for Business	Assistant Director, Property (Liz MacDonald)	Part exempt 3 Information relating to the financial or business affairs of any particular person (including the authority holding that information)