



Borough of Telford and Wrekin

Audit Committee

28 May 2025

Corporate Anti-Fraud & Corruption - 2024/25 Annual Report and Policy

Cabinet Member:	Cllr Zona Hannington - Cabinet Member: Finance, Governance & Customer Services
Lead Director:	Anthea Lowe - Director: Policy & Governance
Service Area:	Policy & Governance
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Wards Affected:	All Wards
Key Decision:	Not Key Decision
Forward Plan:	Not Applicable
Report considered by:	Senior Management Team – 13 May 2025 Audit Committee – 28 May 2025

1.0 Recommendations for decision/noting:

Audit Committee is recommended to:

- 1.1 Consider the 2024/25 Annual Report on corporate anti-fraud and corruption activity; and
- 1.2 Approve the Anti-Fraud & Corruption Policy attached at **Appendix A**.

2.0 Purpose of Report

- 2.1 For the Audit Committee to:

- Consider the 2024/25 Annual Report on corporate anti-fraud and corruption activity.
- Approve the Anti-Fraud & Corruption Policy attached at **Appendix A**.

3.0 Background

- 3.1 The Council is committed to high standards of Corporate Governance and has a set of effective procedures in place to support this.
- 3.2 The committee should review and note the anti-fraud activity detailed in this report as evidence of the Council's commitment to tackling all aspects of fraud and corruption that may affect the authority.

4. Information – Annual Report 2024/25

- 4.1 The Anti-Fraud and Corruption Annual Report and associated policy supports one of the key elements of good corporate governance – Standards of Conduct. The Council aims to ensure that all those associated with it maintain high standards of ethics and conduct in public life.
- 4.2 In their report dated 18 November 2024, the National Audit Office estimated that public sector fraud and error cost the taxpayer between £55 and £81 billion in 2023/24 nationally. The UK Government announced in February 2024 that approximately 40% of crime in the UK is believed to be fraud related. In many organisations fraud goes undetected with potential losses being significant.
- 4.3 Every Council pound lost to fraud is a pound that it cannot spend on providing services to the community. With the continued pressure on public finances, it is more important than ever that the Council is focused on preventing fraud from occurring and investigating and pursuing any potential fraud identified.
- 4.4 This report contains information on counter fraud and investigation activities within Telford & Wrekin Council during the year 2024/25, driven by the Investigation Team along with Internal Audit, IDT Services and the work that other enforcement teams undertake in tackling specific types of fraud.
- 4.5 The term fraud is wide-ranging and can be used to describe acts such as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. The Bribery Act 2010 was introduced to update and enhance UK law on bribery. This report covers all financial impropriety including theft or corruption. When the term "**fraud**" is referred to in this report it will refer to all kindred offences of:

- ☒ Fraud
- ☒ Theft
- ☒ Money Laundering
- ☒ Bribery
- ☒ Corruption

- ☒ Conspiracy
- ☒ Embezzlement

4.6 The Council's procedures and controls are designed to minimise the opportunity for fraud occurring and to highlight areas where there may be a greater risk of possible fraudulent activity. These controls need to be continually reviewed and assessed as the fraud landscape changes. Work undertaken by the Council to prevent/detect fraud is not only about the savings realised by doing so; putting preventative measures in place to reduce the risk of fraud is equally, if not more, important.

5. Transparency Code Requirements

5.1 The Local Government Transparency Code requires the Council to publish data regarding its fraud arrangements as shown in the table below.

	Requirement Description	T&W Arrangements
1	Number of occasions the Council has used the powers under the Prevention of Social Housing Fraud Regulations 2014 or similar powers.	There has been no use of these powers in the last 12 months.
2	Number (absolute and FTE) of employees undertaking investigations and prosecutions of fraud	<p>Currently there are 2 FTE officers undertaking investigations into fraud, theft and other irregularity. They also undertake work related to preventative measures to combat fraud, providing training, writing policies and updating risk assessments.</p> <p>Other Council services also undertake fraud prevention activity for example Internal Audit, Public Protection and IT Services as well as prosecutions being undertaken by the legal team. These tasks form an ancillary part of an officer's job role and therefore it would be difficult to identify what proportion of their role would be taken up undertaking fraud related work.</p>
3	Number (absolute and FTE) of professionally accredited counter fraud specialists	Currently 2 Accredited Counter Fraud Specialists work in the Investigation Team.

4	Total amount spent by the authority on the investigation and prosecution of fraud	<p>The cost of the Investigation Team for 2024/25 was £130,261 including all investigation costs.</p> <p>As stated in point 2 above, other areas of the Council undertake investigations, but it is difficult to attribute a cost to this as costs are consumed in overall budgets for each service.</p>
5	Total number of fraud cases investigated	See case investigation data in this report.

6. The Investigation Team

- 6.1 The Investigation Team, within Audit, Governance & Procurement, has responsibility for investigating all matters of fraud and kindred offences referred to in section 5.5 across the authority. The team is also responsible for supporting the introduction of measures to help prevent the risk of these offences occurring. This support includes the maintenance of the fraud risk register, training staff, providing advice and guidance to service areas on all aspects of fraud prevention, issuing of fraud alerts and producing relevant policies relating to fraud, theft and irregularity. The team works closely with Internal Audit to mitigate fraud risks to the Council.
- 6.2 The Investigation Team also supports the Council's Money Laundering Reporting Officer (MLRO) in their role. Initial Suspicious Activity Reports are screened and interrogated by the team before being passed to the MLRO. The team writes and maintains the Anti-Money Laundering Policy.
- 6.3 The Investigation Team maintains the Speak Up (Whistleblowing) Policy and associated reporting.
- 6.4 Prevention is the most effective way of combating fraud and the Investigation Team looks at ways that each service area can reduce their risk of fraud. However, there will always be instances where fraud occurs and needs to be investigated. A large proportion of the team's investigation work comes from investigating matters affecting the Revenues Service.
- 6.5 The Senior Investigation Officer within the Investigation Team has now undertaken training with the National Crime Agency to become an Accredited Financial Investigator. This qualification ensures that the Investigation Team can undertake essential enquiries into money laundering offences that could affect the authority and is able to obtain material essential to these investigations. The use of an Accredited Financial Investigator is also beneficial in Trading Standards investigations, not only in uncovering the totality of an individual's offending but also in the recovery of proceeds of criminality through mechanisms contained within the Proceeds of Crime Act 2002.

- 6.6 Some investigations commenced in 2024/25 are continuing into 2025/26 due to the fact that some investigations require more in-depth work given the nature of the allegations.
- 6.7 The Investigation Team has undertaken a number of investigations in the Revenues services, saving and/or preventing future expenditure in excess of £113,000. This includes the investigation of Single Person Discount, Council Tax Support, other exemptions and incorrect liability matters.
- 6.8 The first joint investigations with the Department for Work and Pensions were undertaken during 2024/25. The first investigation resulted in over £11,000 in falsely obtained Council Tax Support being identified and recovery action commencing.

7 Investigation Work Undertaken in 2024/25

- 7.1 The Investigation Team concluded 113 investigations in 2024/25 with 67 having a positive outcome, i.e. fraud confirmed and/or financial saving. This figure does not include 46 open investigations which have been carried over into the next financial year.
- 7.2 Direct financial outcomes, i.e. money coming back into the Council and/or future expenditure prevented, as a result of the Investigation Team work are detailed below

Area	Financial Outcome
Revenues Investigations	£112,528
Housing Benefit as result of Revenues investigations	£15,788
Corporate fraud work	£177,542
TOTAL	£305,858

- 7.3 The Investigation Team also manages the National Fraud Initiative (NFI) activity on behalf of the Council. The 2024/25 exercise, to date, has already produced notional savings of £225,000..

8 Preventative work undertaken by the Investigation Team in 2024/25

- 8.1 There is no way of accurately measuring the consequential effects and indirect savings that occur due to the Investigations Team's prevention work detailed in 7.12.2 below. If this work was not undertaken, then the loss to the authority could potentially increase year on year although it is difficult to quantify. In addition, the successful outcomes of investigations serve as a deterrent to those considering committing acts of fraud against the authority.
- 8.2 The Investigation Team's proactive work in 2024/25 included:
- Maintaining and updating the Council's fraud risk register which helps to identify risks across all service areas and details what preventative measures are in place to guard against these risks.

- Providing face to face induction sessions for new starters. In 2024/25, the Investigation Team provided induction sessions to over 120 new starters.
- Providing regular fraud alerts across the authority and to specific service areas based on current local and national fraud risks and trends. The Investigation Team issued 53 National Fraud Alerts to relevant services areas in 2024/25 to help inform the relevant service area of an emerging fraud risk.
- Requesting IDT Services to block all emails that have been highlighted in National Fraud Alerts to help protect the authority from risk of these frauds.
- Providing fraud training to service areas when requested along with updating the online anti-fraud training modules.
- The Investigation Team attended a number of team meetings to offer training to staff to discuss money laundering risks.
- Providing recommendations to service areas following fraud investigations.
- Working closely with the Internal Audit Team to recognise fraud risks, gaps in processes and understanding in service areas and training needs.
- Providing fraud and theft advice when service areas are implementing new policies and procedures.
- Offering advice to employees on any aspect of fraud, theft, bribery and corruption.
- Working closely with the Council's Infrastructure Security Specialist on fraud prevention matters relating to cyber-attacks.

8.3 The preventative measures that the team has helped put in place across the Council continues to be key in preventing fraud from occurring, reducing the risk of fraud and ultimately saving the Council money. These activities and resulting savings are in addition to the savings identified in section 7.11.

9. INTERNAL AUDIT

- 9.1 Internal Audit has a preventative role in ensuring that adequate systems, controls and procedures are in place to prevent and deter fraud, bribery and corruption. They assist managers in ensuring they have appropriate systems and controls in place that are designed to prevent or reduce the opportunity for fraud. Their annual audit plan includes spot checks to assist in the detection and prevention of fraud.
- 9.2 All audit assignments have a standard fraud working paper which is used to measure the auditees understanding of fraud in their area, the findings are then forwarded to the Investigation Team to undertake further checks or training as needed.
- 9.3 The Internal Audit Team and the Investigation Team work collaboratively to share information which informs both the audit plan and the work of the Investigation Team.
- 9.4 Internal Audit also provides continuous advice and guidance to managers to assist them in the prevention of fraudulent activity.

- 9.5 Internal Audit adheres to the Public Sector Internal Audit Standards (PSIAS) which defines their role with regard to fraud prevention, specifically points 1210.A2, 2120.A2 and 2210.A2.

10 Benefits Service

- 10.1 The overall Housing Benefit and Council Tax Reduction caseload has decreased over the last 12 months, from 14,709 (live cases) on 31 March 2024 to 13,290 as of 31 March 2025.
- 10.2 Universal Credit was introduced for new claims and those with certain changes in their circumstance since 14 November 2018. From April 2024 the next phase of Universal Credit began, called managed migration. This is where existing working age customers in receipt of six legacy benefits, including Housing Benefit, have been contacted by the Department for Work and Pensions (DWP) and given three months to make a claim for Universal Credit. The DWP have brought forward, to 31 March 2026, the date when they expect to have contacted all working age customers and migrated those who make a claim.
- 10.3 The Council retains responsibility for Council Tax Reduction and Housing Benefit for pensioners, Council provided temporary accommodation and specified accommodation. The latter is a complex area that has an ever-increasing demand on the service. Telford & Wrekin Council initially signed up to the DWP's Housing Benefit Award Accuracy Initiative in October 2021 prior to it becoming a mandatory requirement for all local authorities. The initiative involves completing Housing Benefit Matching Service (HBMS) matches on cases where DWP data does not match local authority data and undertaking full case reviews into customer's circumstances based on a risk list provided by the DWP. A total of 1,005 reviews and 87 HBMS data matches were completed in 2024/25.
- 10.4 The Benefits Team continues to review changes in earnings and occupational pensions received from the Department for Work and Pensions via their Verification of Earnings and Pensions (VEP) alerts. These alerts notify the Council when there may have been a change in the customer's earnings or pension. The number of alerts has reduced in 24/25 due to managed migration to Universal Credit. The Benefits Team has also reviewed cases as part of the government's National Fraud Initiative.
- 10.5 The DWP continues to provide a wealth of data, and the Council obtains the majority of change of circumstances via their daily downloads and data matches. However, it still remains the customer's responsibility to notify the Council of any changes in their circumstances. Below is a table detailing the intervention work undertaken within the Benefits Service.

Number of Verification of Earnings and Pensions Undertaken	595
Number of Reviews Undertaken (including those outside of the Housing Benefit Award Accuracy Initiative)	1,005

Projected Annual Council Tax Reduction Saving	£46,431.84
Overpaid Housing Benefit	£87,476.41

11. Cyber Fraud

- 11.1 As a Council we have numerous technical controls in place to counter or prevent cyber fraud such as email security gateways and antivirus products. These help to prevent or mitigate malicious activity from 'actors' such as crime groups who use techniques such as phishing or ransomware to conduct criminal activity in an attempt to encrypt, disrupt or steal and leak data with the intent of getting a payment.
- 11.2 The Council has not been the victim of any successful Distributed Denial of Service Attacks (DDOS) during 2024/25 due to the preventative measures put in place. The Council continues to develop its technical defences to help prevent future cyber-attacks.
- 11.3 Working with the Investigation Team, any email addresses that have been identified, through national fraud alerts, as being used in attempted and successful fraud attacks on other Councils are blocked from being able to access any service at Telford & Wrekin Council.
- 11.4 During 2024/25 the Council moved to a new Protective Domain Name Service (PDNS) from the National Cyber Security Centre. This system prevents access to domains which are known nationally to be malicious.
- 11.5 During 2024/25 the Council had 2,138 malicious emails reported to IDT, 8 of the most sophisticated were reported to a 3rd party service to assist with centralised blocking.
- 11.6 There were 576 malicious URL in emails which were actioned and blocked along with 143 email file attachments.

12. Fighting Fraud in the Community

- 12.1 The Investigation Team has a close working relationship with West Mercia Police Intelligence Team. A Service Level Agreement (SLA) exists which facilitates the sharing of data for the prevention and detection of crime. The team assists the Police on a regular basis in a variety of matters under this agreement. This is an important partnership in helping the fight against crime in the local community, some of which will include matters of fraud and theft that fall under the Police's jurisdiction.

West Mercia Police has stated that this information sharing is invaluable and saves thousands of pounds each year. On occasions, information received from the Police may lead to investigations being conducted by the Investigation Team which otherwise may have not taken place. In 2024/25, the team processed over 250 enquiries to support West Mercia Police under this agreement. This is a great example of a joined-up approach to tackle crime in the local community.

- 12.2 The Public Protection Service (which includes Trading Standards, Licensing, Night-time Economy), Health Protection Hub and Private Sector Housing, play a significant role in delivering the Council's response to business and individual fraud in the borough. The majority of the responses are based around statutory responsibilities refined to provide effective detection and countermeasures in respect to fraud.

These services are not restricted as to who they can investigate and are constrained only by the limitations of the statute under which an investigation is being conducted. Public Protection Services actively engage in the Multi Agency Targeted Enforcement (MATES) across a wide variety of settings and support the wider serious and organised crime agenda.

- 12.3 All teams, through the course of their routine work, may come across irregularities. Where these irregularities are outside of Public Protection's remit, they are referred to agencies such as UK Border Force, Driving & Vehicle Licensing Agency, HM Revenues & Customs, Insurance Fraud Bureau, Police and internal service areas such as the Investigation Team and Revenues and Benefits Service.

13. Health Protection

- 13.1 Fraud can occur in a number of areas that the Health Protection team covers. The prevention and detection of unfit and debased food through inspection, sampling and intelligence is part of the team's role. Members of the public can use an online portal to report any concerns that they may have.
- 13.2 In 2024/25 the Food Health & Safety Team, part of Health Protection, undertook a project to look at imported American sweets and drinks sold at targeted premises across the borough. The aim of the project was to be able to assess whether or not there were items of food with banned ingredients being sold to the public. The project included training for officers on what to look for and how to deal with any products that were identified, identifying retail premises which were likely to sell these types of food and producing an advice sheet to give out to businesses and parents, via schools, on what to look out for. The project helped to increase awareness and compliance across the borough.
- 13.3 Fraudulent use of health and identification marks is another area that the team investigate. All approved premises within the borough are checked to ensure they are applying the health mark appropriately when they are inspected. Inspectors will routinely check for health marks on animal products in retail establishments.

14 Licensing and Night-time Economy Service

- 14.1 Within the Licensing Service there are a number of areas with the potential for fraud. Licensing applications/permits details are checked at the initial application stage, and then throughout the lifecycle of the licence/permits to ensure compliance. These are listed below:

- Street trader consents
 - Prevention and detection of the illegal transfer or sub-letting of street trader consents by checking details of applicants and compliance visits undertaken.
 - Ensuring application details are correct including National Insurance Numbers/ DOB etc.
- Taxi licensing –
 - Ensuring licensed vehicles are correctly insured with documents being verified by officers to ensure that insurance certificates have not been altered and only driven by a Telford Council licensed driver.
 - Ensuring taxi drivers submit tax conditionality checks and current DBS certificates as part of their application/renewal process. There has been occasions whereby an applicant has submitted incomplete documentation, such as not declaring all known names on their DBS certificate.
- Scrap metal licensing –
 - Joint working with police to detect illegal trading in stolen vehicles, other stolen metal items such as copper cabling, lead and catalytic convertors.
 - Tax check code required before a licence is granted.
- Street Collections, charity collections –
 - Applicants must give details of the charity and authorisation to show that they can collect on their behalf, to help identify fraudulent collections
 - Within 30 days of the end of the collection a return form showing details of the monies collected must be completed and returned to the Council
- Gambling Act
 - An annual program of compliance audits is conducted at licensed premises to ensure adherence to licensing conditions.
 - Submission of annual statistical returns to the Gambling Commission to ensure compliance with anti-money laundering (AML) regulations and other necessary policies, which are regularly updated to reflect the latest requirements.

15 Trading Standards Service

- 15.1 The Trading Standards Service enforces specific pieces of Consumer Protection legislation that contribute to the tackling of fraud and fraudulent trading across the borough. Due to the correlation between certain consumer protection offences with offences under the Fraud Act 2006, Trading Standards will look to prosecute for fraud where it is the most appropriate charge.

In 2024/25, two significant prosecutions of rogue builders were concluded at Crown Court. In both cases, the traders were found guilty of offences against vulnerable consumers under the Fraud Act 2006, with one receiving a custodial sentence of 5 ½ Years, and the second a 2-year term of imprisonment suspended for 2 years. The values of the frauds were £70,000 and £60,000 respectively.

- 15.2 In 2024/25 Trading Standards have been heavily involved with work tackling the supply of counterfeit and illicit tobacco and vapes. In addition to Trading Standards

led work, the team supported two Police operations in their national fraud intensification month, focussing on businesses in the borough suspected of being involved in fraud and money laundering. Several seizures of illegal products were made and cash seized, and assets frozen by the Police. Investigations are ongoing.

- 15.3 Within the Central England area, there is a Regional Trading Standards Investigation Team, funded via a national grant. It takes referrals from local Trading Standards services where a business or trader is causing problems to consumers on a regional or national level.

Telford Trading Standards noticed a dramatic increase in complaints about a particular motor business, with a total consumer detriment estimated at over £300,000. This large-scale potential fraud has been referred to the Regional Investigation Team (RIT) who are actively investigating the trader. This is the second Telford based trader the Trading Standards Team have referred to the RIT, the second being a home improvements business. The trader has pleaded not guilty to Fraud Act charges and trial scheduled for June 2027. Total value of fraud is circa £180,000 affecting 20 consumers across 12 Local Authority areas.

16. Publicity

- 16.1 Publicity of any cases is important as a deterrent. The Investigation Team and other enforcement teams use Corporate Communications to issue press releases and social media to alert the public and inform businesses about relevant campaigns, interventions and prosecutions. The press releases are also published on the Council's website.
- 16.2 When any significant investigation occurs then the relevant Director and Cabinet Member are briefed accordingly. Any lessons learnt are shared within the relevant members of staff and recommendations put forward to help prevent such matters occurring again.
- 16.3 Where allegations of internal frauds have been investigated and procedures and controls are changed the lessons learnt are shared across the Council through the staff news, bulletins and in management meetings.

17. Training and Awareness

- 17.1 The Council ensures that both members and officers are aware of their responsibilities in respect to the Council's Anti-Fraud and Corruption Policy. This is achieved through a variety of measures including:
- New starters receiving a face-to-face induction program which includes training from the Investigation Team every quarter.
 - Online training courses being available for all staff on fraud, theft, bribery, cyber security/fraud and corruption along with money laundering. These courses were updated in 2024/25.

- Internal Audit recommending relevant teams undertake the online fraud or money laundering training as part of audit recommendations.
- The Investigation Team attending service area team meetings when a need is identified or when requested, to discuss prevention and detection of fraud, theft, bribery and corruption.
- The Investigation Team providing specific training to services areas when the need arises.
- Regular fraud awareness being provided through corporate communication channels and staff news
- Regular national alerts being sent to affected service areas which helps increase staff awareness.
- Copies of all relevant policies, such as the Fraud Response Plan the Whistleblowing Policy and any other relevant policy being available on the intranet.
- Guidance being provided by Internal Audit when work is undertaken in a service area.
- Regular cyber threat alerts being issued by IDT.

18. Challenges for 2025/26

- 18.1 The threat of fraud and related offences against the authority continues to grow. The work of the Investigation Team each year highlights more service areas that are identifying fraud attempts and risks. Although there is a separate Anti-Money Laundering Policy, it is recognised that the two types of offences go hand in hand. Fraud is the most common form of criminality in the UK and public services are actively targeted. There is no financial safety net, and any financial loss will impact the Council's ability to provide services. Therefore, the Council's response to this is to be proactive and reactive.
- 18.2 The main challenge for 2025/26 continues to be the financial constraints the authority is facing which provides some challenge to resource levels across the Council.
- 18.3 On 1 September 2025 the Economic Crime and Corporate Transparency Act 2023 comes into force which includes a new offence of failing to prevent fraud. The impact of this offence on the authority's preventative measures is yet unknown but this could be a significant challenge for 2025/26.

19. Anti-Fraud & Corruption Policy Update

- 19.1 The Anti-Fraud and Corruption Policy has been reviewed, updated and is brought to committee for review this year. The policy was last reviewed in 2023 and is required to be reviewed every two years.

20.0 Summary of main proposals

- 20.1.1 That members note the content of this report and approve the policy at **Appendix A**.

21.0 Alternative Options

- 21.1 Members do not note the report and/or approve the policy at **Appendix A**. However if members chose this option, it would not comply with good governance requirements.

22.0 Key Risks

- 22.1 Having a policy which sets out the Council's anti-fraud and corruption culture and associated procedures assists in the management of the risk of fraud and corruption against the Council

23.0 Council Priorities

- 23.1 The policy supports all corporate priorities and good corporate governance demonstrating the Council's desire to ensure sound conduct and ethical procedures for all those associated with the Council and its service delivery. Monitoring the policy provides the opportunity to identify if there are any changes required or additional areas of activity.

24.0 Financial Implications

- 24.1 The report details the financial impact of fraud and corruption to the Council where it has been possible to quantify. Costs associated with the anti-fraud and corruption work outlined in this report are met from the Council's base budget. This includes staffing costs, training, marketing and promotion costs, stationery and any postage.

25.0 Legal and HR Implications

- 25.1 The Accounts and Audit Regulations 2015 require the Council to ensure 'that the financial management of the body is adequate and effective and that the body has a sound system of internal control'. The anti-fraud documents help to fulfil this requirement.

The Council has full regard to relevant legislative requirements, including without limitation:

- The Fraud Act 2006
- Theft Act 1968
- Bribery Act 2010
- Section 151 Local Government Act 1972
- Section 5 Local Government & Housing Act 1989
- Contracts Regulations 2015
- Accounts and Audit Regulations 2011
- The Council Tax Reduction Schemes (Detection and Enforcement) (England) Regulations 2013
- Local Government Finance Act 1988
- Regulation of Investigatory Powers Act 2000

- Terrorism Act 2006
- Proceeds of Crime Act 2002
- Police and Criminal Evidence Act 1984
- Companies Act 2006
- Localism Act 2011
- The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017

26.0 Ward Implications

- 26.1 There are no specific ward implications related to this report. The work of the Investigation Team encompasses all the Council's activities across the Borough and therefore it operates within all Council Wards detailed in the Parish Charter

27.0 Health, Social and Economic Implications

- 27.1 There are no health, social or economic implications directly arising from this report.

28.0 Equality and Diversity Implications

- 28.1 Transparency supports equalities and demonstrates the Council's commitment to be open and fair.

29.0 Climate Change, Biodiversity and Environmental Implications

- 29.1 There are no direct climate change and environmental implications arising from this report.

30.0 Background Papers

- 1 Fraud Response Plan 2024-25
- 2 Anti-Money Laundering Policy 2025-26
- 3 Speak Up (Whistleblowing) Policy 2024/25

31.0 Appendices

- A Anti-Fraud & Corruption Policy

32.0 Report Sign Off

Signed off by	Date sent	Date signed off	Initials
Legal	15/05/2025	19/05/2025	RP
Finance	19/05/2025	19/05/2025	MLB