

Warwickshire County Council

The Council adopts a holistic approach to the prevention and detection of fraud & corruption in all areas of its business. The Council has a Counter Fraud, Bribery and Corruption Framework designed to support a culture of openness, honesty and integrity. Through its Bribery & Corruption Framework the Council is seeking to promote and develop a strong counter-fraud culture, raise awareness and provide information on all aspects of its counter-fraud work. This includes publicising the results of proactive work, fraud investigations, successful sanctions and any recovery of losses due to fraud.

To make the Bribery & Corruption Framework 'real' for its staff, the Council has a comprehensive fraud and corruption area within its intranet and runs an annual awareness raising campaign called 'Do the Right Thing'. This campaign reminds staff of their obligations in relation to fraud and corruption, provides case studies of where things could go wrong and offers good practice hints and tips to help staff deliver the Counter Fraud, Bribery and Corruption Framework. At the end of the campaign, staff are required to make a declaration of any interests that they may have that may potentially impact on their role as Council officers.

Specifically in relation to the prevention and detection of procurement fraud and corruption, the Council: -

- Regularly reviews its Contract Standing Orders and related procurement processes, procedures and guidance for managers
- Has developed and launched a corporate wide Contract Management Framework which amongst other things contains measures aimed at minimising/detecting fraud.
- Has supported the launch of its Contract Management Framework with a suite of training comprising a mandatory e-learning module for all staff and mandatory face to face training for contract managers across the Council
- Has undertaken a thorough review of its 'Top 40' contracts against the Contract Management Framework
- Has been undertaking its procurement electronically since December 2016. One of the reasons for this is that electronic procurement is considered to be a more secure way of managing the tendering process thereby reducing any potential fraud and corruption risks
- The Council includes a link to its Whistleblowing policy in all of its tenders and through its published guidance for suppliers, encourages suppliers to report any behaviour they consider to be inappropriate
- Requires all tender evaluation panel members to make a declaration of any potential conflicts of interest on a procurement by procurement basis. This is in addition to the annual declaration which follows the 'Doing the Right Thing' campaign
- The Council has adopted the use of the national Selection Questionnaire (SQ) and is committed to the exclusion of all suppliers that fail to meet the SQ fraud and corruption stipulations from the procurement process

- Requires all tenderers to complete, sign and return anti-collusion and anti-canvassing declarations in response to all Invitations to Tender and Invitations to Quote
- Participates in the National Fraud Initiative
- Publicises its 'over £500' spend in accordance with Transparency requirements
- Reviews its P-Card statements monthly to identify potential areas of fraud
- Has internal processes to identify potential duplicate payments and supports this by periodically engaging external organisations to undertake recovery audits which include a duplicate payment review
- Undertakes regular contract management and specific contract audits
- Makes use of strong audit and procurement networks to share intelligence in relation to fraud and corruption