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| <b>For Information</b>  |   |
| <b>Public</b>           |   |
| <b>Report to:</b>       | <b>Audit and Scrutiny Panel</b>   |
| <b>Date of Meeting:</b> | <b>30 June 2016</b>   |
| <b>Report of:</b>       | <b>R. Adams, Commercial Director, East Midlands Strategic Commercial Unit</b> |
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| <b>Agenda Item:</b>     | <b>8</b>  |

\*If Non Public, please state under which category number from the guidance in the space provided.

## **ANTI-FRAUD & CORRUPTION POLICY – REVIEW OF COMPLIANCE (Oct 2015 – March 2016)**

### **1. Purpose of the Report**

- 1.1 The East Midlands Strategic Commercial Unit (EMSCU) published their policy entitled Prevention of Fraud and Corruption in the Procurement Process (the Policy) on 16<sup>th</sup> May 2013 – see Appendix A. The policy is written for both partner Forces and whilst written to be applicable to procurement activity conducted by EMSCU for contracts with a total value of £25k and above, the principles are equally applicable to lower level procurements. The two partner Forces are Nottinghamshire Police and Northamptonshire Police.
- 1.2 The report informs the Audit and Scrutiny Panel of the level of compliance against the EMSCU Fraud and Corruption Policy for the period October 2015 until March 2016.

### **2. Recommendations**

- 2.1 It is recommended that the Panel notes the following:
- 2.2 That EMSCU's Commercial Director has received no reports of any fraudulent activity following any audit of procurement activity undertaken by the Force.
- 2.3 That EMSCU's Head of Supplier Services (to which the Policy directs any individual wishing to report any suspicion of fraudulent activity) has advised that there have been no reports of any fraudulent activity in relation to procurement activity undertaken within Nottinghamshire Police.
- 2.4 That EMSCU's Head of Supplier Services has written to Suppliers to re-iterate the Force position in relation to Gifts, Gratuities and Hospitality. The relevant Force procedure states that Police Officers and Staff should not accept the offer of any gift, gratuity, favour or hospitality as to do so might compromise their impartiality or give rise to a perception of such compromise.

2.5 That EMSCU's Commercial Awareness training programme continues to be delivered on an on-going basis and includes content on the prevention of fraud and corruption in the procurement process.

2.6 In addition EMSCU have included reference and guidance to Conflicts of Interest and Gifts & Hospitality on procurement documents in relation to suppliers notifying us if they have any 'relationship' with any member of the Forces. We have also included links to the Code of Ethics.

PQQ – Conflict of Interest, Gifts & Hospitality

ITT - Conflict of Interest, Gifts & Hospitality

RFQ - Conflict of Interest, Gifts & Hospitality

Evaluation Code of Conduct - Conflict of Interest

Tender Evaluation Panelist Declaration – Conflict of Interest

### **3. Reasons for Recommendations**

3.1 To give the Panel confidence that there is policy, guidance and training in place to mitigate the risk of fraudulent activity occurring during the procurement process.

### **4. Summary of Key Points**

4.1 Nothing further to note.

### **5. Financial Implications and Budget Provision**

5.1 Not applicable

### **6. Human Resources Implications**

6.1 Not applicable

### **7. Equality Implications**

7.1 Not applicable

### **8. Risk Management**

8.1 EMSCU maintains its own Risk Register and manages and controls all identified commercial risks. Currently, there are no high risks recorded in relation to fraud and corruption.

### **9. Policy Implications and links to the Police and Crime Plan Priorities**

9.1 Not applicable

### **10. Changes in Legislation or other Legal Considerations**

10.1 None to note at present.

## **11. Details of outcome of consultation**

11.1 Not applicable

## **12. Appendices**

12.1 The Policy is attached to this report.  
APPENDIX A