

## Anti-fraud, Bribery and Corruption Policy 2020

<b>Purpose of paper</b>	This paper presents the Anti-fraud, Bribery and Corruption Policy 2020 for GDC employees.
<b>Status</b>	Public
<b>Action</b>	For decision
<b>Corporate Strategy 2016-19</b>	Performance Objective 2: To improve our management of resources so that we become a more efficient regulator.
<b>Business Plan 2018</b>	Not applicable
<b>Decision Trail</b>	<p>The Senior Leadership Team considered the updated policy at its October 2019 meeting.</p> <p>The Finance and Performance Committee considered the updated policy at its November 2019 meeting and recommended the policy be submitted to Council for approval.</p> <p>The Audit and Risk Committee considered the updated policy at its November 2019 meeting. Due to paper circulation deadlines, any comments from ARC will be provided verbally at the Council meeting.</p>
<b>Next stage</b>	Not applicable
<b>Recommendations</b>	<p>The Council is asked to:</p> <ul style="list-style-type: none"> <li>• Consider the Anti-fraud, Bribery and Corruption Policy 2020;</li> <li>• Approve the Anti-fraud, Bribery and Corruption Policy 2020.</li> </ul>
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<b>Appendices</b>	Appendix 1 – Anti-fraud, Bribery and Corruption Policy 2020

## **1. Executive summary**

- 1.1. This paper presents the Anti-fraud, Bribery and Corruption Policy 2020 for GDC employees. This policy includes the GDC's approach to the identification, management and investigation of fraud, bribery and corruption.
- 1.2. The policy was last updated in 2018 and incorporated a number of policy recommendations made by Mazars following their audit in July 2017. For 2020 the policy for employees has been reformatted, and definitions around corruption, theft and financial malpractice have been included. There is no fundamental change proposed to the 2019 policy or our underlying process.
- 1.3. This policy was considered by the Finance and Performance Committee and Audit and Risk Committee at their November 2019 meeting. Suggestions recommended by the both committees have been incorporated, and the policy was recommended for approval by Council
- 1.4. Council are invited to consider and approve the Anti-fraud, Bribery and Corruption Policy 2020.

## **2. Introduction and background**

- 2.1. The GDC expects all members of staff, including directors, employees, fixed term contractors and temporary employees, to have and be seen to have the highest standards of honesty, propriety and integrity in the exercise of their duties. The GDC will not tolerate fraud, impropriety or dishonesty and will investigate all instances of suspected fraud, impropriety, or dishonest conduct by employees.
- 2.2. The GDC will take proportionate action – including disciplinary action, dismissal and/or criminal prosecution against any member of staff who, in the course of their work defrauds, or attempts to defraud, the GDC or uses GDC information to carry out fraud.
- 2.3. The GDC is committed to preventing fraud from occurring and to developing an anti-fraud culture. To achieve this, the GDC will:
  - Maintain and develop effective controls to prevent fraud.
  - Ensure that if fraud occurs a vigorous and prompt investigation takes place.
  - Take appropriate disciplinary and legal action if fraud is discovered.
  - Review systems and procedures to prevent similar frauds.
  - Investigate whether there has been a failure in supervision and take appropriate disciplinary action where supervisory failure has occurred.
  - Record and report all discovered cases of fraud.
- 2.4. Internal control systems have been established that are designed to counter the risks faced by the GDC, as set out in the Statement of the GDC's Chief Executive's responsibilities in the Annual Report & Accounts, and as per the financial policies & procedures that are approved annually by the Council. Together they are accountable for the adequacy and effectiveness of these arrangements. Managing fraud risk should also be seen in the context of the management of the wider range of risks.
- 2.5. The policy was last updated for 2018 and incorporated a number of policy recommendations made by Mazars following their audit in July 2017. For 2020 the policy for employees has been reformatted, and definitions around corruption, theft and financial malpractice have been included. There is no fundamental change to the 2019 policy or our underlying process.

## **3. Risks and considerations**

<b>Communications</b>
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<ul style="list-style-type: none"> <li>• Copies of the full policy documents will need to be made available to staff (via the intranet) and associates.</li> </ul>
<b>Equality and Diversity</b> <ul style="list-style-type: none"> <li>• None arising from this paper.</li> </ul>
<b>Legal</b> <ul style="list-style-type: none"> <li>• The Fraud Act 2006 and The Bribery Act 2010 details the legal definitions of fraud and what can be considered an offence.</li> </ul>
<b>Policy</b> <ul style="list-style-type: none"> <li>• No impact on policy.</li> </ul>
<b>Resources</b> <ul style="list-style-type: none"> <li>• No cost implications from this decision.</li> </ul>
<b>National</b> <ul style="list-style-type: none"> <li>• No national effect of this decision.</li> </ul>
<b>Risks on registers</b> <ul style="list-style-type: none"> <li>• No links to risks on either the strategic or operational risk register.</li> </ul>

#### **4. Recommendations**

- 4.1. Council are invited to consider and approve the Anti-fraud, Bribery and Corruption Policy 2020.

#### **5. Appendices**

- Appendix 1 – Anti-fraud, Bribery and Corruption Policy 2020