

Anti-Fraud, Bribery and Corruption Policy Statement

Introduction

South Yorkshire Pensions Authority is responsible for the stewardship of the pensions savings of a large number of individuals. These funds have largely been derived from the public purse and consequently the Authority looks to operate with the highest standards of probity in relation to these funds.

The Authority is committed to protecting the funds it administers and consequently will not tolerate any form of abuse. The Authority is determined to pursue, deter and detect all forms of fraud, bribery and corruption committed against it, whether that be internally or from outside the organisation.

The Authority is determined that the culture and tone of the organisation should be one of honesty and rigorous opposition to fraud, bribery and corruption. Thus the Authority is committed to ensuring all of its business is conducted in an open, honest, equitable and fair manner and that it is accountable to all stakeholders (scheme members and scheme employers).

The Authority will not tolerate fraud, bribery, or corruption committed or attempted by its members, employees, suppliers, contractors, scheme employers or scheme members and will take all necessary steps to investigate allegations of fraud, bribery or corruption and pursue the sanctions available in each case, in particular the recovery of the Authority's assets or funds.

Definitions

Fraud is defined as "any irregularity or illegal act characterised by intentional deception with the intent to make a personal gain, or to cause loss, or to expose another to the risk of loss".

Bribery is defined as "an inducement or reward offered, promised, or provided to gain personal, commercial, regulatory or contractual advantage".

Both are criminal offences under various pieces of legislation.

Standards

The Authority expects all its staff (whether permanent or temporary), members, and all its contractors and suppliers to:

- Act honestly and with integrity at all times and to safeguard those assets of the Authority for which they are responsible.
- Comply with the spirit as well as the letter of the law and regulations in all jurisdictions in which the Authority operates in respect of the lawful and responsible conduct of business.

In addition managers are required to design and operate systems of control which minimise the risk of fraud, bribery and corruption.

Reporting Fraud, Bribery and Corruption

The Authority encourages and expects its members and employees, as well as scheme members and scheme employers to report incidents of suspected fraud, bribery and corruption. A whistleblowing policy is in place to facilitate the reporting of concerns by employees and Authority members where the normal reporting to a line manager is not

appropriate. The public are able to utilise the corporate complaints procedure to raise concerns about wrongdoing.

Investigating Allegations of Fraud, Bribery and Corruption

In normal cases the Authority's Internal Audit Service will undertake, or direct the investigation of a fraud, bribery, or corruption allegation. Matters of a criminal nature will be referred to the Police. The Internal Audit Service has a reporting and liaison protocol in place with South Yorkshire Police.

The Authority participates in the National Fraud Initiative which is run by the Cabinet Office. The Internal Audit Service is responsible for co-ordinating all activity in relation to this.

Monitoring Fraud, Bribery and Corruption

The Authority's Audit Committee will have responsibility for monitoring the effectiveness of the Authority's arrangements for dealing with fraud, bribery and corruption through the review process which supports the Committee's contribution to the Annual Governance Statement.

The Audit Committee will make recommendations to the Authority for any change in its arrangements for dealing with fraud, bribery and corruption identified as necessary as a result of this review.

Overlap with Other Policies

This policy statement overlaps with a number of other policies;

- The responsibilities of individual employees and Authority members are set out in the relevant codes of conduct.
- The responsibilities of scheme employers are set out in the Pensions Administration Strategy.
- The Authority's Contract Standing Orders and associated terms of business set out the expectations on suppliers and contractors and the arrangements applying to employees involved in carrying out procurement activity.
- The Authority has a specific policy in relation to the receipt of gifts and hospitality which **must** be adhered to by all Authority Members and employees.

This policy statement does not over ride the detailed requirements set out in these policy documents.

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