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Blaenau Gwent

Our Ref./Ein Cyf.
Your Ref./Eich Cyf.
Contact:/Cysylltwch â:

THIS IS A MEETING WHICH THE PUBLIC ARE ENTITLED TO ATTEND

22nd April 2024

Dear Sir/Madam

CABINET

A meeting of the Cabinet will be held in via MS Teams on Monday, 29th April, 2024 at 10.30 am.

Yours faithfully

Damien McCann
Interim Chief Executive

AGENDA

Pages

1. SIMULTANEOUS TRANSLATION

You are welcome to use Welsh at the meeting a minimum notice period of 3 working days is required should you wish to do so. A simultaneous translation will be provided if requested.

2. APOLOGIES

To receive any apologies for absence.

Mae'r Cyngor yn croesawu gohebiaeth yn Gymraeg a Saesneg a byddwn yn cyfathrebu gyda chi yn eich dewis iaith, dim ond i chi rhoi gwybod i ni pa un sydd well gennych. Ni fydd gohebu yn Gymraeg yn creu unrhyw oedi.

The Council welcomes correspondence in Welsh and English and we will communicate with you in the language of your choice, as long as you let us know which you prefer. Corresponding in Welsh will not lead to any delay.

3. DECLARATIONS OF INTEREST AND DISPENSATIONS

To receive any declarations of interest or dispensations.

DECISIONS

4. CABINET 3 - 6

To consider the decisions of the Cabinet meeting held on 10th April, 2024.

CORPORATE AND PERFORMANCE PORTFOLIO

5. COMMERCIAL STRATEGY FOR THE COUNCIL 7 - 72

To consider the report of the Chief Officer Commercial and Customer.

6. ANTI-FRAUD, ANTI-CORRUPTION & ANTI-BRIBERY POLICY 73 - 86

To consider the report of the Audit and Risk Manager.

To: Councillor S. Thomas (Chair)
Councillor H. Cunningham
Councillor J. C. Morgan
Councillor H. Trollope
Councillor S. Edmunds

All other Members (for information)
Interim Chief Executive
Chief Officers

COUNTY BOROUGH OF BLAENAU GWENT

REPORT TO: THE LEADER AND MEMBERS OF THE CABINET

SUBJECT: CABINET – 10TH APRIL, 2024

REPORT OF: DEMOCRATIC & COMMITTEE SUPPORT OFFICER

**PRESENT: Leader/
Cabinet Member - Corporate Overview & Performance
Councillor S. Thomas**

**Cabinet Member – Place and Regeneration
Councillor J.C. Morgan**

**Cabinet Member – People & Social Services
Councillor H. Trollope**

WITH: Interim Chief Executive
Chief Officer Resources
Interim Corporate Director of Education
Head of Legal & Corporate Compliance
Head of Organisational Development
Team Manager Estates & Strategic Asset Management
Service Manager Policy & Partnerships
Professional Lead for Strategic Partnerships

DECISIONS UNDER DELEGATED POWERS

<u>ITEM</u>	<u>SUBJECT</u>
No. 1	<p><u>SIMULTANEOUS TRANSLATION</u></p> <p>It was noted that no requests had been received for the simultaneous translation service.</p>
No. 2	<p><u>APOLOGIES</u></p> <p>The following apologies for absence were reported:</p>

	<p>Councillor H. Cunningham, Deputy Leader/Cabinet Member for Place & Environment, Councillor S. Edmunds, Cabinet Member for People & Education; and the Interim Corporate Director Social Services.</p>
No. 3	<p><u>DECLARATIONS OF INTEREST AND DISPENSATIONS</u></p> <p>No declarations of interest or dispensations were reported.</p>
	<p><u>DECISIONS</u></p>
No. 4	<p><u>CABINET</u></p> <p>Consideration was given to the decisions of the Cabinet Meeting held on 21st February, 2024.</p> <p>RESOLVED that the decisions be received as a true record of proceedings.</p>
	<p><u>CORPORATE AND PERFORMANCE PORTFOLIO</u></p>
No. 5	<p><u>BLAENAU GWENT LOCAL WELL-BEING PARTNERSHIP</u></p> <p>Consideration was given to report of the Head of Democratic Services, Governance and Partnerships.</p> <p>RESOLVED that the report be accepted, and Cabinet endorse the report and appendices for approval by the Blaenau Gwent Local Well-being Partnership. (Option 1)</p>
No. 6	<p><u>BUSINESS RATES RELIEF - RETAIL, LEISURE AND HOSPITALITY RATES RELIEF 2024-25</u></p> <p>Consideration was given to report of the Chief Officer Resources.</p> <p>RESOLVED that the report be accepted, and Cabinet adopt the Retail, Leisure, and Hospitality Rates Relief – 2024/25 scheme on</p>

	<p>behalf of the Council, to supplement the Council's discretionary rate relief scheme. (Option 2)</p>
	<p><u>PLACE AND ENVIRONMENT PORTFOLIO</u></p>
No. 7	<p><u>LOCAL GOVERNMENT ACT 1972 PROPOSED TRANSFER OF FURTHER LAND TO ABERTILLERY BLUEBIRDS</u></p> <p>Consideration was given to report of the Corporate Director Regeneration & Community Services.</p> <p>RESOLVED that the report be accepted, and Abertillery Bluebirds be allowed to take on control of the sports field at Windsor Road to facilitate use by junior members of the club. (Option 1)</p>
	<p><u>PEOPLE & EDUCATION PORTFOLIO</u></p>
No. 8	<p><u>IMPROVING SCHOOLS PROGRAMME</u></p> <p>Consideration was given to report of the Interim Corporate Director of Education.</p> <p>RESOLVED that the report be accepted as presented. (Option 2)</p>
No. 9	<p><u>EDUCATION DIGITAL STRATEGY</u></p> <p>Consideration was given to report of the Interim Corporate Director of Education.</p> <p>RESOLVED that the report be accepted, and Cabinet approve the Strategy. (Option 1)</p>
No. 10	<p><u>BLAENAU GWENT ADMISSIONS POLICY FOR NURSERY AND STATUTORY EDUCATION 2025/26</u></p> <p>Consideration was given to report of the Interim Corporate Director of Education.</p> <p>RESOLVED that the report and Policy be accepted. (Option 1)</p>

No. 11

WELSH PUBLIC LIBRARY STANDARDS (WPLS)
ANNUAL RETURN 2022/23

Consideration was given to report of the Interim Corporate Director of Education.

RESOLVED that the report be accepted, and the information detailed therein be approved. (Option 1)

Agenda Item 5

Cabinet and Council only

Date signed off by the Monitoring Officer: 22/04/2024

Date signed off by the Section 151 Officer: 22/04/2024

Committee: Special Cabinet

Date of meeting: 29th April 2024

Report Subject: Commercial Strategy for the Council

Portfolio Holder: Councillor Stephen Thomas, Leader and Cabinet Member for Corporate Overview & Performance

Report Submitted by: Bernadette Elias – Chief Commercial Officer and Customer
Lee Williams – Service Manager Commercial and Business Development

Reporting Pathway								
Directorate Management Team	Corporate Leadership Team	Portfolio Holder / Chair	Governance Audit Committee	Democratic Services Committee	Scrutiny Committee	Cabinet	Council	Other (please state)
3/4/24	4/4/24				25/4/24	29/4/24		

1. Purpose of the Report

- 1.1 The purpose of this report is to present the Council's Revised Commercial Strategy 2024 – 2027 (hereafter 'the strategy' attached at appendix 1) to the Cabinet for approval.

2. Scope and Background

- 2.1 The current Commercial strategy (attached at appendix 2), was approved in 2020 and represented the first strategy for the Council, setting out a commitment to be a more commercially minded organisation.
- 2.2 Set against the reality of an increasingly difficult financial climate for Local Government and the need to continue momentum to bring a more commercial approach to service delivery, it is considered timely to review the strategy and approach.
- 2.3 The strategy supports how the council can plan and find innovative ways to change how it delivers services to the community. It will have a fundamental role in driving further transformation and modern service delivery models for the Council as well as maximising financial efficiencies.
- 2.4 The strategy sets out a clear Statement of Intent:
To deliver wider and better social outcomes for Blaenau Gwent through optimising our financial sustainability by managing and reducing costs, maximising use of our assets, generating more income and improving customer journeys.
- 2.5 In response to the financial challenges the term 'commercial' is increasingly featured in Local Government approaches and the above statement remains firmly grounded in public service principles. Therefore, the strategy encompasses a wide spectrum of activity that enables a commercial approach to realise wider benefits. These include;

- Supporting local growth and community wealth building including through socially responsible commissioning and procurement, to reduce 3rd party spend and to maximise the Blaenau Gwent Pound;
- Transformation and innovation of our services – how we can do things differently and look to do different things;
- Exploring modern digital solutions such as Artificial Intelligence to transform how we do things;
- Using and maximising our assets and being responsive to commercial investment opportunities, helping to protect key services and invest in Council priorities;
- Putting the user at the centre of how we design our services and mapping the customer journey including the potential for digital solutions to provide a better offer and value for money; and
- Continuing to build our knowledge and skills and work with others to support the cultural change needed.

The Strategy is underpinned by two (2) key principles and three (3) priorities:-

2.6 **Principle One**

Develop a culture that supports the organisation to become more commercially minded.

Aim: To develop the knowledge, skills and behaviours across the organisation so that better commercial planning becomes business as usual.

2.7 **Principle Two**

Develop the organisational governance and procedures that will support commercial planning.

Aim: To set the right conditions to enable directorates to be responsive to opportunities and bring forward and progress commercial proposals for consideration.

2.8 **Priority One**

To change the way in which Elected Members and staff perceive and drive forward commercial opportunities.

Aim: Establishing a better understanding of the wider commercial spectrum including the opportunity to maximise assets and drive service innovation.

2.9 **Priority Two**

To build and embed the organisational approaches that support the development of alternative models of service delivery.

Aim: To establish a tool set and governance framework that enables the organisation to be responsive and maximise commercial opportunities.

2.10 **Priority Three**

To develop an organisational programme of proposed commercial investment opportunities.

Aim: To create a pipeline to identify, prioritise and deliver a commercial programme of projects that require investment to support the Council's Corporate Plan and Medium-term Financial Strategy (MTFS)

3. **Options for Recommendation**

To include Recommendation(s) / Endorsement by other groups, e.g. CLT/Committees/Other groups)

3.1 CLT endorsed the Strategy on 4th April 2024

3.2 Corporate Overview and Performance Scrutiny Committee considered the report on 25th April. A verbal update on the outcome of the discussion will be provided to Cabinet.

3.3 Option 1
That Cabinet approves the Commercial Strategy.

3.4 Option 2:
That Cabinet considers the Commercial Strategy and provides recommendations for changes.

4. **Evidence of how this topic supports the achievement of the Corporate Plan / Statutory Responsibilities / Blaenau Gwent Well-being Plan**

4.1 The Local Government (Wales) Measure 2009 (Section 15), places a duty on all Local Authorities in Wales to make arrangements to secure continuous improvement. As part of this, the Council is required to develop a Corporate Plan.

4.2 The Well-being of Future Generations (Wales) Act 2015 also places individual duties on public bodies. The legislation is about improving the social, economic, environmental and cultural well-being of Wales and creating a Wales that we all want to live in, now and in the future. The Strategy supports these objectives and the Corporate Plan priority "an ambitious and innovative Council delivering quality services at the right time and in the right place".

4.3 The strategy is an important part of the overall governance framework including responsibilities under the Social Partnership obligations. It is aligned to other key Council plans and strategies including the MTFS, Customer Services strategy, Digital Strategy, Workforce Strategy, Regeneration Strategy, Communication Strategy and the Decarbonisation Plan.

5. **Implications Against Each Option**

5.1 ***Impact on Budget (short and long term impact)***

Whilst there are no direct budget implications associated with the adoption of this strategy, subsequent commercial activities will look to:-

5.1.1 support the Council's MTFS and Bridging the Gap programme by

- 5.1.2 maximising the use of existing assets;
- 5.1.3 controlling costs;
- 5.1.4 maximising income opportunities;
- 5.1.5 identifying and progressing commercial investment opportunities;

5.2 ***Risk including Mitigating Actions***

- 5.2.1 If the strategy is not adopted and progressed there is a risk to the financial resilience of the council.
- 5.2.2 If the business case framework is not optimised there is a potential the risk and reward for each proposal is not clear, which could hinder informed decision making.
- 5.2.3 The risks and risk tolerance level for potential commercial investment opportunities needs to be considered and understood :there is a risk that the Council is too risk averse in some of its decision making and misses a potential opportunity this will be balanced against accepting a considered level of risk to generate income from investment opportunities.
- 5.2.4 Utilising the agreed business case framework developed with the Chartered Institute of Public Finance and Accountancy (CIPFA) and where appropriate, seeking external advice to assist informed decision making and good governance, which mitigates against the risk of not being responsive enough to commercial opportunities.
- 5.2.5 Utilising a multi-disciplinary team approach ensuring that the right skill sets are able to inform and support the development of robust commercial business in a timely and responsive manner. As evidenced in a recent acquisition business case approved by Council.

5.3 ***Legal***

- 5.3.1 The Social Partnership and Public Procurement (Wales) Act embeds the principle of social partnership in the operation of public bodies in Wales. It encourages collaboration between employers, employees, and other stakeholders to enhance public service delivery and overall well-being.
- 5.3.2 Principle Two of the Strategy focuses on developing the organisational governance and procedures that will support commercial planning and the aim of Priority Two is to establish a tool set and governance framework that enables the organisation to be responsive and maximise commercial opportunities.
- 5.3.3 Internal and external advice on potential commercial investment opportunities will be sought as appropriate to complement internal knowledge and skills to assist informed decision making.
- 5.3.4 Associated procurement and commissioning requirements will be administered in accordance with the Public Contract Regulations and the Council's Contract Procedure Rules

5.3.5 The strategy will support the council to maximise existing and emerging national arrangements such as Corporate Joint Committees as appropriate.

5.4 **Human Resources**

5.4.1 The officer SCCB will provide strategic oversight to the Council's commercial ambitions, ensuring robust check and challenge to commercial opportunities and escalation through to the democratic decision making process as required;

5.4.2 Using the officer Business and Commercial Opportunities Network to support a multi-disciplinary approach to nurture and develop commercial opportunities and ensuring we make full use of our internal skills and expertise;

5.5 **Health and Safety**

None identified

6. **Supporting Evidence**

6.1 **Performance Information and Data**

6.1.1 As part of the review process an assessment of progress against the objectives in the current commercial strategy was undertaken. This was presented to the SCCB in March 2023, as part of the check and challenge process.

In summary, of the 26 listed ambitions, 9 were considered as being achieved, 16 as being progressed and 2 as requiring further work; both of which related to the identification and progression of investment opportunities, which have been achieved following the development and adoption of the Commercial and Business Case Framework.

6.1.2 Work to progress a strong governance framework has included;

- A Socially Responsible Procurement Strategy adopted by Council April 2023;
- Vigorous Contract Management arrangements to reduce expenditure across all areas of business;
- The officer Strategic Commercial and Commissioning Board (SCCB) terms of reference and focus has been refreshed;
- The SCCB is supported by the Business and Commercial Opportunities Network which has reviewed its terms of reference and focus as part of a Wider Corporate Leadership Team session in February 2024;
- The Business Case Model developed with CIPFA is in place and used for proposals to support the MTFs and Bridging the Gap programme;
- Redevelopment of ICT platforms to make digital transformation an integral part of our approach to providing high-quality cost-effective services as part of the recently agreed Digital Transformation Strategy;
- Utilising customer journey solutions to realise service efficiencies, whilst maximising customer engagement as part of the recently agreed Customer Service Strategy;

6.1.3 Key activities under each priority are set out in the strategy. Following approval of the strategy by Cabinet these will be underpinned by action plans and key performance

information to monitor progress and impact. Work is currently underway to develop this information which will capture both qualitative data insight and quantitative metrics.

6.2 ***Expected outcome for the public***

- 6.2.1 Using and maximising our assets and being responsive to commercial opportunities, thereby helping to protect key services and re-investment in Council priorities and supporting its financial resilience.
- 6.2.2 Putting the user at the centre of how we design our services and mapping the customer journey including the potential for digital solutions to provide a better offer and value for money.

6.3 ***Involvement (consultation, engagement, participation)***

- 6.3.1 A range of activities to supporting staff and Member learning and development has been delivered including external support via SOLACE and CIPFA including:
 - Creating & managing an Entrepreneurial Council workshop held with Cabinet/CLT (September 2022);
 - Hosted a series of staff workshops with service managers from all directorates to develop understanding of wider commercial skills (September 2022);
 - Engaged with the TU and the Welsh Government (WG) Social Partnership team as part of the development of the new procurement strategy (2022). A Corporate Leadership Team and TU session on Social Partnership facilitated by the WG team is planned for May 2024;
 - Engaged with Cwmpas who held a workshop focusing on social value and *buy local buy social* to support our foundational economy (March 2023);
 - Business case training sessions for staff delivered with CIPFA (June 2023);
 - Practical sessions with staff held to consider worked on outline business cases (June 2023);
 - Facilitated session with members of wider CLT to further develop our thinking on developing commercial investment pipeline opportunities (October 2023);
 - Elected Member Session on what commercial means for the council (September 2023) ;
 - Wider Corporate Leadership Team engagement on our proposed approach for the strategy (November 2023)
 - Wider Corporate Leadership Team session on a review of terms of reference for the business and commercial opportunities network
 - 6.3.2 Desktop research undertaken on other LA's strategies and the 2022 Audit Wales report on commercialisation in local government. Recommendations from the latter have been considered as part of the strategy review.
 - 6.3.3 Public consultation undertaken as part of the recent budget setting process aligned to Bridging the Gap proposals.
- ## 6.4 ***Thinking for the Long term (forward planning)***
- 6.4.1 The strategy looks to future proof the council approaches supporting financial resilience including recognition of;

- Increasing public and customer need;
- Broader public sector integration;
- Shift in public expectation;
- Far better utilisation of public sector assets;
- Significant reduction in public funding;
- Digital solutions supporting innovation in service delivery;
- Developing internal commercial skill sets to support commercial ambitions;

6.5 ***Preventative focus***

- 6.5.1 Use of accurate and timely market intelligence data to influence sourcing activities;
- 6.5.2 Using a multi-disciplinary approach to support the development of robust business cases;
- 6.5.3 Established governance arrangements providing effective 'check and challenge' on potential commercial opportunities;
- 6.5.4 Through our customer-centred design approach we will consider each element of a process and how customers use our services;
- 6.5.5 Improved use of data, better engagement and collaboration will allow us to join up services to remove barriers between organisations so that customers can easily access what they need, supporting behaviour change where possible;

6.6 ***Collaboration / partnership working***

- 6.6.1 Working with a range of external partners has supported the development of commercial approaches including via WLGA, SOLACE, CIPFA, WG and Cwmpas.
- 6.6.2 Focussed learning and development opportunities has enabled the organisation to build internal skills and knowledge to support the development of future commercial opportunities across directorates.
- 6.6.3 Connected with WG commercial lead and developed a commercial workstream in the WLGA network;
- 6.6.4 The strategy will be shared with key partners to support working towards a more joined up public services experience for customers.

6.7 ***Integration (across service areas)***

- 6.7.1 The strategy sets out a clear statement of intent which will require a whole organisational approach to develop and maximise commercial opportunities in a range of ways.
- 6.7.2 Being more commercially minded is a whole organisational responsibility and the strategy recognises the need to develop and embed the right mind-set to fully enable this.

6.8 ***Decarbonisation and Reducing Carbon Emissions***

6.8.1 Commercial ambitions and opportunities will be progressed via the established commercial framework, which will consider the Council's Net Zero and Climate Emergency requirements on a project by project basis;

6.8.2 Associated procurement and commissioning requirements will be sourced in accordance with the Council's Socially Responsible Procurement Strategy;

6.8.3 Utilisation of digital solutions where appropriate also supports the wider decarbonisation agenda;

6.9 ***Integrated Impact Assessment (IIA)*** *(All decisions, policy reviews or policy implementation will now require a completed Integrated Impact Assessment) To note a screening template no longer needs to be completed*

IIA included at appendix 3

7. **Monitoring Arrangements**

7.1 *State how the work will be monitored e.g. through scrutiny or directorate performance management arrangements*

7.1.2 Following approval, key performance information to measure impact in delivering the strategy will be established and used to provide updates through the democratic process;

7.1.3 Information will be included in the quarterly Joint finance and performance report, which is part of the committee forward work programme, including an annual quarter 4 position;

7.1.4 It is proposed a midpoint review of the strategy be undertaken;

7.1.5 Exception reporting to SCCB on a quarterly basis;

Background Documents /Electronic Links

- Appendix 1 Commercial Strategy 2024 - 2027

- Appendix 2 Commercial Strategy 2020 - 2024

- Appendix 3 IIA

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Blaenau Gwent Council Commercial Strategy

‘A place that is fair, open and welcoming to all
by working with and for our communities’

2024 - 2027



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Foreword

As a Council we are ambitious and focused, we want to create an environment that is connected and rich with opportunities, a place which is great for jobs and businesses and where people thrive in education, in their career and in their spare time.

We have an annual budget in excess of £200 million, high levels of community need and we are clear on the difficult financial climate for local government in Wales. This means we have to plan and find innovative ways to change how we deliver public services.

This strategy will set out our commercial approach to service delivery for our communities.

Stephen Thomas - Leader

Helen Cunningham - Deputy Leader

Introduction

Where we are now

This Commercial Strategy has been developed to support the Council in the delivery of its corporate objectives and important public services it provides.

It is a key element of the medium-term financial strategy and is set against a backdrop of financial challenges and the desire to have the best possible outcomes for local residents and businesses.

STATEMENT OF INTENT

To deliver wider and better social outcomes for Blaenau Gwent through optimising our financial sustainability by managing and reducing costs, maximising use of our assets, generating more income and improving customer journeys.

Blaenau Gwent Context

The key themes and priorities to this strategy have been developed through user engagement with customers, staff engagement, senior management workshops, elected member engagement sessions, discussions with public sector partners including WLGA, SOLACE and CIPFA. Recommendations made by Audit Wales have also been integrated into this document as has Welsh Government and UK Government policy and obligations.

This strategy will support the Council's Vision of being 'a place that is fair, open and welcoming to all by working with and for our communities'.

It will help to deliver the Council's Corporate Plan Priorities:

Maximise learning and skills for all to create a prosperous, thriving, resilient Blaenau Gwent

Respond to the nature and climate crisis and enable connected communities

An ambitious and innovative Council delivering quality services at the right time and in the right place

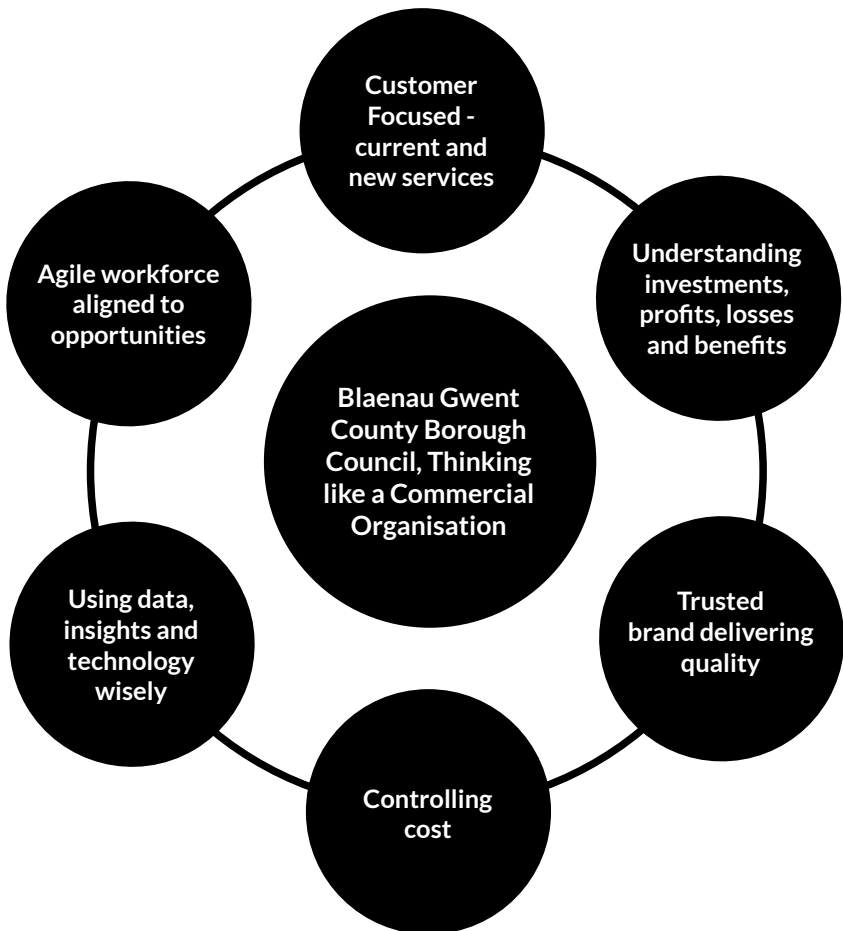
Empowering and supporting communities to be safe, independent and resilient

The strategy is aligned to the ambitions of the following key plans and strategies:

- > Medium Term Financial Strategy, Bridging the Gap Programme and Business Case Framework
- > Workforce Strategy
- > Regeneration / Growth Strategy
- > Digital Transformation Strategy
- > Customer Service Strategy
- > Climate Emergency / Decarbonisation
- > Communication Strategy

This strategy demonstrates the Council's commitment and investment into becoming a commercially minded organisation by:

- > Supporting learning and developing skills;
- > Providing equal access to services;
- > Driving further transformation and modern, commercial service delivery models for the Council;
- > Identifying and developing the right technology in the right way;
- > Improving collaboration with others to identify innovative ways to change how we deliver public services;



Our Commercial Spectrum

Managing 3rd party spend through effective procurement, commissioning and contract management;

Maximising income opportunities, including fees and charges;

Digital solutions to drive down cost, increase efficiencies and provide a good customer offer;

Service redesign and transformation – understanding the customer journey; Optimising investment and development opportunities;

Wales Context

The strategy will contribute towards the requirements and standards set out in the following:

- > **Well-being and Future Generations Act Welsh Procurement Policy**
- > **Welsh Procurement Policy**
- > **Social Partnership and Public Procurement (Wales) Act**
- > **Digital Strategy for Wales**

Whilst delivering this Strategy, we will ensure the decisions we make consider the well-being goals and five ways of working:

Long Term, Integration, Involvement, Collaboration and Prevention.

We will ensure that our decisions are evidenced-based and consider the social and economic impact on our communities.

Our Principles

The Strategy is underpinned by two key principles and three priorities, which are essential to improving and delivering our commercial ambitions:

Principle One

Develop a culture that supports the organisation to become more commercially minded.

Aim: To develop the knowledge, skills and behaviors across the organisation so that better commercial planning becomes business as usual.

Key activities will include:

- > Developing a shared understanding of what commercial means for our organisation, customers and businesses;
- > Actively working with others to share knowledge, ideas, experience and practice that could support our commercial activity;
- > Continuing to develop the impact of the officer Strategic Commercial Commissioning Board (SCCB) and the supporting Business and Commercial Opportunities Network (BaCON), to identify and develop opportunities across the commercial spectrum;
- > Delivering a targeted programme of Learning and Development opportunities to support our continued development of skills and capacity;

Principle Two

Develop the organisational governance and procedures that will support improved commercial planning.

Aim: To set the right conditions to enable directorates to be responsive to opportunities and bring forward commercial proposals for consideration.

Key activities will include:

- > providing strategic direction and oversight to ensure commercial opportunities are aligned to the Council's corporate priorities;
- > ensuring our governance framework and procedures enables us to act in a timely way to maximise opportunities;
- > building and developing multi-disciplinary teams drawing on internal expertise, external advice and learning from others to produce commercial business cases;
- > providing an opportunity to share and recognise good practice from across the organisation and further afield;

Our Priorities

Priority One – To change the way in which elected Members and staff perceive and drive forward commercial opportunities.

Aim: Establishing a better understanding of the wider commercial spectrum including the opportunity to maximise assets and driving service innovation.

Key activities will include:

- > developing a shared understanding of what commercial means for our organisation, customers and businesses;
- > promoting the development of a more business minded culture and approach across the organisation;
- > continuing elected member and staff engagement to help support the necessary culture and behavioural change;
- > continuing to deliver a targeted programme of Learning and Development opportunities to support our commercial approaches;
- > becoming more efficient when delivering projects with shared knowledge, ownership and understanding;
- > embedding better commercial planning into service delivery across the Council;
- > providing commercial support to staff and Services to assist with the development of opportunities and transformation that leads to enhanced commercial outcomes;

Priority Two - To build and embed the organisational approaches that support alternative models of service delivery and commercial investment opportunities.

Aim: to establish a tool set and governance framework that enables the organisation to be responsive and maximise commercial opportunities.

Key activities will include:

- > ensuring a clear and robust route through the democratic process to enable elected members to consider commercial opportunities as they arise;
- > continuing to embed the commercial and business case framework to ensure consistent application and robust documentation is submitted for consideration;
- > building and developing multi-disciplinary teams to produce commercial business cases, improve skills and draw on internal expertise;
- > continuing to develop the impact of the officer Strategic Commercial Commissioning Board (SCCB) and the supporting Business and Commercial Opportunities Network, to identify and develop opportunities across the commercial spectrum as defined in this strategy;
- > developing a dynamic register of commercial projects to provide corporate oversight and to support on-going monitoring and review;
- > exploring opportunities to develop CJC's to support wider collaborations;
- > maximising our commercial advantage through effective commissioning, procurement and contract management activities;
- > making further use of technology in support of the Council becoming a more modern, dynamic organisation;

Priority Three - To develop an organisational wide programme of current and proposed commercial activity;

Aim: to create a pipeline to identify, prioritise and deliver a commercial programme of projects that require investment to support the Council's Corporate Plan and MTFS.

Key activities will include:

- > applying the commercial framework to identify and prioritise commercial opportunities;
- > shaping investment options based on robust business cases, risk assessment and market intelligence;
- > using data and market intelligence to inform business cases and support strategic decision making;
- > aligning commercial projects to the corporate objectives and to support wider outcomes;

Monitoring and Review

This strategy is one of a set of strategic commercial programmes designed to secure the future sustainability across the community and deliver improved outcomes for our residents and businesses.

A set of quantitative and qualitative metrics and performance measures will be developed and reported via the established democratic processes.

In addition, the strategy will be subject to a mid-term review to ensure we keep pace with on-going changes to commercial innovation, technologies and customer expectations.

The officer Strategic Commercial Commissioning Board (SCCB) will provide direction and oversight to the Council's commercial ambitions, ensuring robust check and challenge to commercial opportunities and escalation through to the democratic decision making process as required.

Blaenau Gwent County Borough Council
The General Offices
Steelworks Road
Ebbw Vale
NP23 6DN

Tel: 01495 311556

Website: www.blaenau-gwent.gov.uk



Cyngor Bwrdeistref Sirol

Blaenau Gwent

County Borough Council



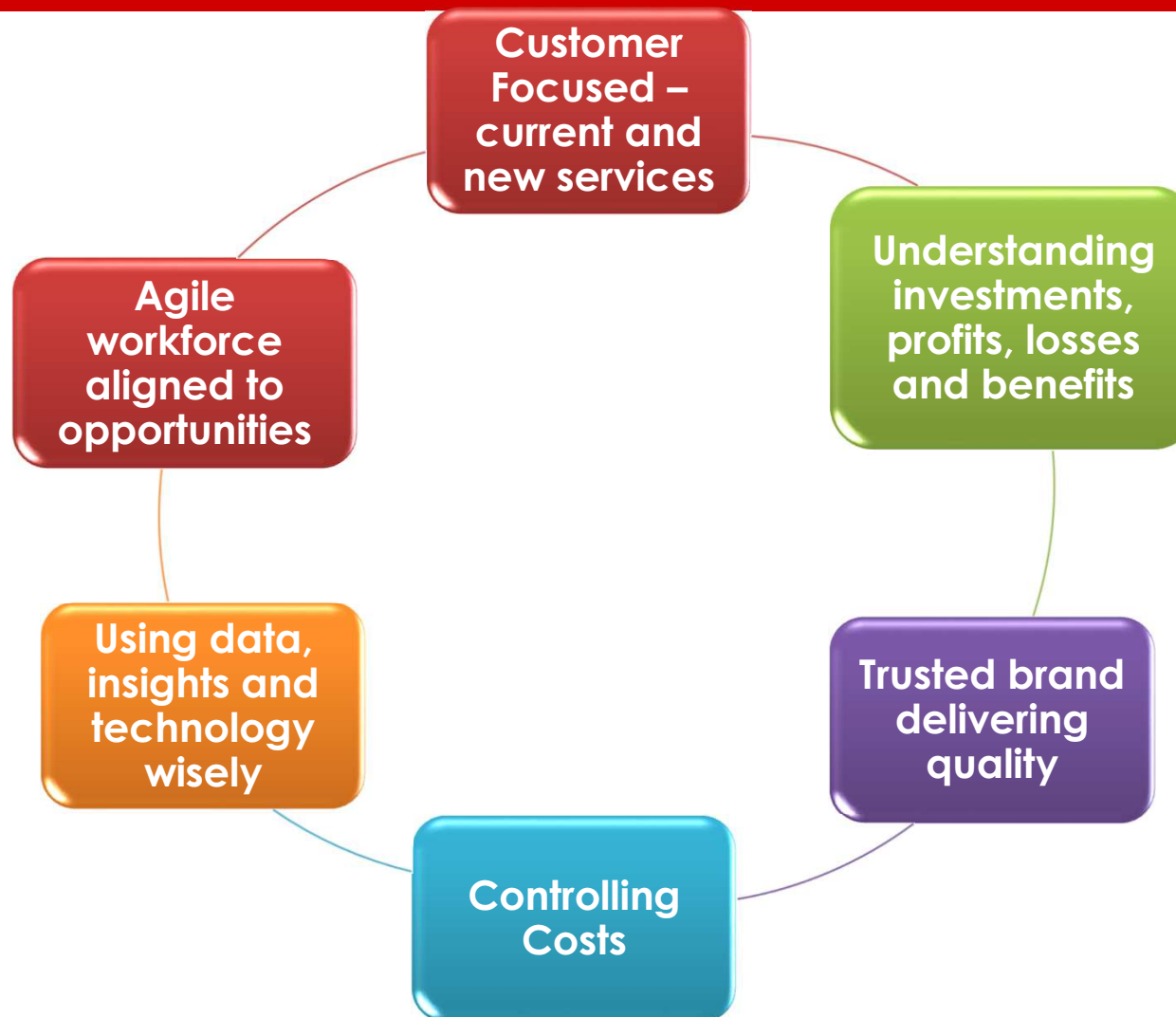
Blaenau Gwent County Borough Council

Commercial Strategy and Work Programme

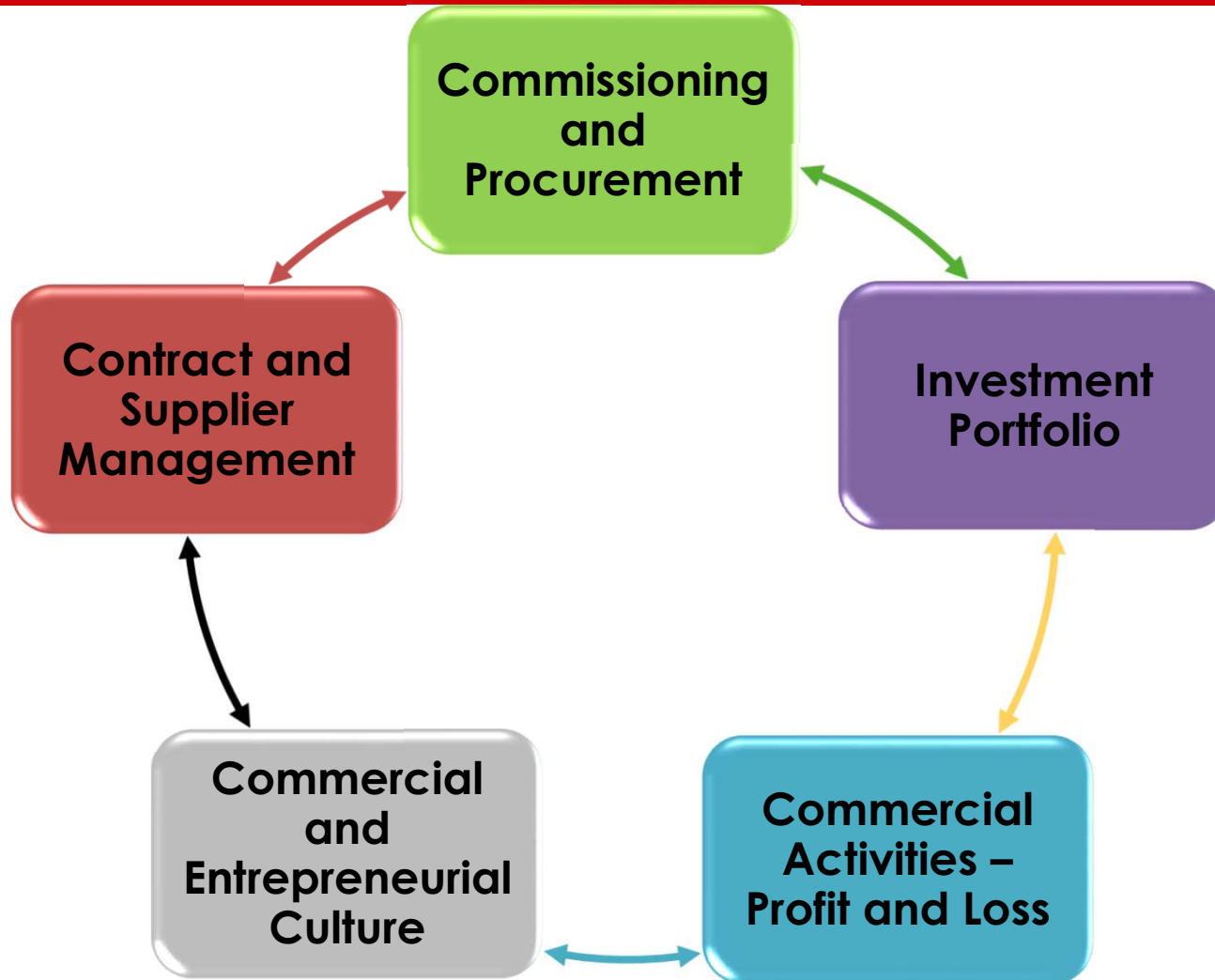
Commercial ambitions for Blaenau Gwent

Blaenau Gwent County Borough Council

Thinking like a commercial organisation



Blaenau Gwent County Borough Council Commercial Ambitions



Blaenau Gwent's Commercial Ambitions

- **Commissioning and Procurement**

Commissioning the right services in the right way to ensure value for money and delivering better outcomes

- **Investment Portfolio**

Shaping the investment options based on robust business cases, risk assessment and market intelligence

- **Commercial Activities – Profit and loss**

Identification of truly commercial opportunities based on market intelligence, assessment of business opportunities and strong profit and loss accounting

- **Commercial and Entrepreneurial Culture**

Involvement of staff and partners in identifying opportunities along side the ability to create robust business cases, seek investment and have capacity to scale operations

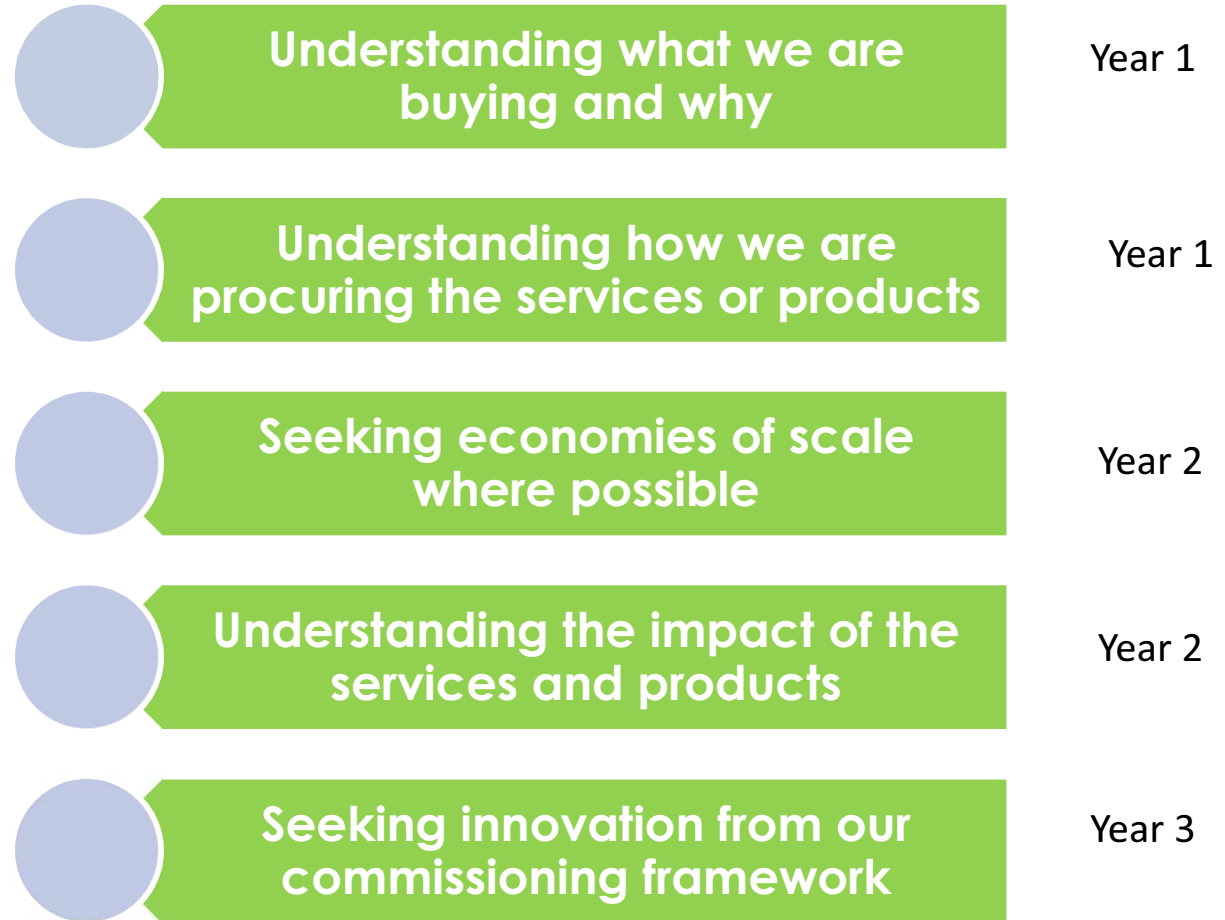
- **Contract and Supplier Management**

Improved contract management and negotiation skills working with our suppliers to control costs, achieve value for money and deliver innovative solutions

Ambition 1 – Commissioning and Procurement

Commissioning the right services in the right way to ensure value for money and delivering better outcomes

Commissioning and Procurement



Ambition 2 – Investment Portfolio

Shaping the investment options based on robust business cases, risk assessment and market intelligence

**Investment
Portfolio**

**Agreeing options for investments
linked to our investment strategy**

Year 1

**Agreeing our risk and reward
yields**

Year 1

Exploring investment vehicles

Year 2

**Strong governance for
investment management**

Year 2

Ambition 3 – Income

Identification of truly commercial opportunities based on market intelligence, assessment of business opportunities and strong profit and loss accounting

**Commercial
Activities
Profit and
Loss**

- Review of current commercial activities Year 1
- Create business plans to support existing commercial activities Year 1
- Agree a vehicle for identifying commercial opportunities Year 2
- Agree appropriate business case development Year 2
- Agree triggers to end commercial activities that are not profitable Year 2
- Agree further investments to scale and grow successful commercial activities Year 3

Ambition 4 – Commercial and Entrepreneurial Culture

Involvement of staff and partners in identifying opportunities along side the ability to create robust business cases, seek investment and have capacity to scale operations

Commercial and Entrepreneurial Culture

- Create a vehicle for capturing ideas for commercial activities Year 1
- Identify roles that have the freedoms to be entrepreneurial Year 1
- Build the skills to assess market opportunities Year 2
- Build the skills to assess best commissioning options Year 2
- Identify the organisational barriers Year 2
- Agree investment routes to build new commercial activities Year 3
- Agree governance arrangements to ensure quality is achieved and risks mitigated Year 3

Ambition 5 – Contract and supplier management

Improved contract management and negotiation skills working with our suppliers to control costs, achieve value for money and deliver innovative solutions

Contract and supplier management



Commercial Governance

CLT

Strategic Commercial Board

Commissioning and Procurement base on strategic imperatives

Commercial and Entrepreneurial opportunities

Investment Strategy Programme

Monitor Commercial Activities and projections

Other Inputs: Senior Managers from Service Areas - Legal, Procurement, Finance, Communications etc.



Commercial Strategy

Feedback

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Blaenau Gwent County Borough Council - Integrated Impact Assessment

This integrated impact assessment (IIA) has been designed to help support the Council in making informed and effective decisions to promote equality and improve outcomes for groups with protected characteristics.

- Section 1-Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Section 2-Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010
- Section 3-Corporate Plan
- Section 4-Wellbeing of Future Generations (Wales) Act 2015
- Section 5-Welsh Language (Wales) Measure 2011
- Section 6-Children’s Right “The Right Way”
- Section 7-Community Safety
- Section 8 Armed Forces
- Section 9-Data
- Section 10-Consultations Statutory Consultation Doctrine of Legitimate Expectation and Gunning Principles
- Section 11-Monitoring
- Section 12-Decision of proposal

Lead Officer	Head of Service	Service Area & Department	Date
Lee Williams	Bernadette Elias	Commercial Services - Procurement	March 2024

Briefly outline the proposal indicating what change or decision is to be made, also provide any documentation that may be used to support this.

What is the proposal that needs to be assessed?

The following proposal is to set the **Commercial Strategy 2024-2027**

As a Council we are ambitious and focused, we want to create an environment that is connected and rich with opportunities, a place which is great for jobs and businesses and where people thrive in education, in their career and in their spare time.

We have an annual budget in excess of £200 million, high levels of community need and we are clear on the difficult financial climate for local government in Wales. This means we have to plan and find innovative ways to change how we deliver public services.

This strategy will set out our commercial approach to service delivery for our communities. This Commercial Strategy has been developed to support the Council in the delivery of its corporate objectives and important public services it provides.

It is a key element of the medium-term financial strategy and is set against a backdrop of financial challenges and the desire to have the best possible outcomes for local residents and businesses. The strategy aims deliver wider and better social outcomes for Blaenau Gwent through optimizing our financial sustainability by managing and reducing costs, maximizing use of our assets, generating more income and improving customer journeys.

This strategy will support the Council's Vision of being 'a place that is fair, open and welcoming to all by working with and for our communities'.

It will help to deliver the Council's Corporate Plan Priorities:

- Maximize learning and skills for all to create a prosperous, thriving, resilient Blaenau Gwent
- Respond to the nature and climate crisis and enable connected communities
- An ambitious and innovative Council delivering quality services at the right time and in the right place
- Empowering and supporting communities to be safe, independent and resilient

As well as linking to the following plans and strategies

- Medium Term Financial Strategy, Bridging the Gap Programme and Business Case Framework
- Workforce Strategy
- Regeneration/ Growth Strategy
- Digital Transformation Strategy
- Customer Service Strategy
- Climate Emergency/ Decarbonization
- Communication Strategy

This strategy demonstrates the Council's commitment and investment into becoming a commercially minded organization by:

- supporting learning and developing skills
- providing equal access to services
- identifying and developing the right technology in the right way
- driving further transformation and modern, commercial service delivery models for the Council
- improving collaboration with others to innovative ways to change how we deliver public services

We believe this strategy shows how we as an organisation is thinking like a business where we use data, control our costs, maximise opportunities, procure effectively/responsibly whilst providing a good customer journey. This is a vital step forward in order to take Blaenau

Gwent Council into the future

NOTE: This strategy has been written as a tool that sits alongside the Integrated Impact Assessment process in order to ensure that any decisions taken are informed and fully understood in or to mitigate negative outcomes for those living and working in Blaenau Gwent as well as contributing the overall corporate vision.

Section 1

Outline how the proposal will impact on any people or groups of people with protected characteristics, please refer to the Equalities Act 2010 (Wales) for further information [Equality Act 2010: guidance - GOV.UK \(www.gov.uk\)](http://www.gov.uk) and the EHRC guidance [The Essential Guide to the Public Sector Equality Duty: EHRC](#)

Briefly outline below if there will be any positive or negative impacts as a result of the proposal being considered.

Protected characteristics	Will the proposal have any positive impacts on those with a protected characteristics?	Will the proposal have any negative impacts on those with a protected characteristics?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
Age (<i>people of all ages</i>)	We believe that the Commercial Strategy will have a positive impact on all categories as it allows for better understanding of alignment in achieving positive outcomes by aiming to increase the value of community and social benefits delivered through Council Services, value of community benefits delivered. The strategy also explains how the WFG act goals are considered in particular for Long Term,	No as we believe the strategy is written to assist officers to ensure the best possible outcomes for future generations of those living in the Blaenau Gwent community. The strategy also ensures that officers use the strategy along with IIA process to ensure any impacts are considered and fall in line with the overall vision for Blaenau Gwent and it's future.	We are committed to deliver wider and better social outcomes for Blaenau Gwent through optimizing our financial sustainability by managing and reducing costs, maximizing use of our assets, generating more income and improving customer journeys. This strategy will help to make Blaenau Gwent a community which maximises learning and skills for all, embraces environmental change, supports economic business growth, works in partnership to provide high quality services to meet local needs and improves the quality of life and well-being within the community.
Disability (<i>people with disabilities/ long term conditions</i>)			
Gender Reassignment (<i>anybody who's gender identity or gender expression is different to the sex they were assigned at birth</i>)			
Marriage or Civil Partnership (<i>people who are married or in a civil partnership</i>)			

<p>Pregnancy and Maternity (<i>women who are pregnant and/or on maternity leave</i>)</p>	<p>Integration, Involvement, Collaboration and Prevention as well ensuring that decisions are evidenced-based and consider the social and economic impact on our communities.</p>		
<p>Race (<i>people from black, Asian and minority ethnic communities and different racial backgrounds</i>)</p>			
<p>Religion or Belief (<i>people with different religions and beliefs including people with no beliefs</i>)</p>			
<p>Sex (<i>women and men, girls and boys and those who self-identify their gender</i>)</p>			
<p>Sexual Orientation (<i>lesbian, gay, bisexual, heterosexual, other</i>)</p>			

NOTE: Section 2 only needs to be completed if proposals are of a strategic nature or when reviewing previous strategic decisions. See page 6 of the Preparing for the Commencement of the Socio-economic Duty Welsh Government Guidance.

Section 2
Socio-economic Duty (Strategic Decisions Only)
The Welsh Governments [Socio-economic Duty](#) provides a framework in order to ensure tackling inequality is at the forefront of decision making.

.Please consider the below vulnerable groups and consider how the proposal could affect them:

- | | | |
|--|------------------------------|--|
| ➤ Single parents and vulnerable families | ➤ Carers | ➤ People who have experienced the asylum system |
| ➤ People with low literacy/numeracy | ➤ Armed Forces Community | ➤ People of all ages leaving a care setting |
| ➤ Pensioners | ➤ Students | ➤ People living in the most deprived areas in Wales (WIMD) |
| ➤ Looked after children | ➤ Single adult households | ➤ People involved in the criminal justice system |
| ➤ Homeless people | ➤ People misusing substances | |

Socio Economic disadvantage definitions.	Will the proposal have a positive, negative or neutral impacts on the below?	How could you mitigate the negative impacts outlined?	Please highlight any evidence that has been considered.
<p>Low Income / Income Poverty <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i></p>	<p>We believe that this Strategy will help us to deliver for the future for Blaenau Gwent Council as an organisation, staff and the communities we serve as we feel</p> <ul style="list-style-type: none"> • That the potential for generating income could not only support the organisation to maintain services but could potentially help support further development or 	<p>We do not believe the strategy will afford and negative impacts but in turn sets out how we will maximise opportunity to improve positive outcomes. We are committed to making Blaenau Gwent a community which maximises learning and skills for all, embraces environmental change, supports economic business growth, works in partnership to provide high quality services to meet local</p>	
<p>Low and/or No Wealth <i>(enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future)</i></p>			
<p>Material Deprivation <i>(unable to access basic goods and services)</i></p>			




<p><i>i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.)</i></p>	<p>enhancement in the future.</p> <ul style="list-style-type: none"> • having a direct impact on overall spend, savings, value for money and the cost of service provision to the people of Blaenau Gwent; • helping to shape the delivery of services to meet the needs of citizens, communities and customers • To ensure that decisions consider how local market can best be supported. 	<p>needs and improves the quality of life and well-being within the community.</p>	
<p>Area Deprivation <i>(where you live (rural areas), where you work (accessibility of public transport) Impact on the environment?)</i></p>			
<p>Socio-economic Background <i>(social class i.e. parents education, employment and income)</i></p>			
<p>Socio-economic Disadvantage <i>(What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged)</i></p>			

Section 3-Corporate Plan

Please outline any Corporate Plan linkages of the proposal -[BG Corporate Plan 22-27](#)

<p>Priority 1 - Maximise learning and skills for all to create a prosperous, thriving, resilient Blaenau Gwent</p>	<p>How effectively we spend our money will have a direct impact on our ability to deliver all of our corporate ambitions and priorities. Thus, the Council recognises that an effective commercial strategy is fundamental to achieving organisational success and is instrumental in the delivery of the Corporate Plan, as it will:</p>
<p>Priority 2 - Respond to the nature and climate crisis and enable connected communities</p>	<ul style="list-style-type: none"> • Will present commercial opportunities as they arise • maximising our commercial advantage through effective commissioning, procurement and contract management activities;
<p>Priority 3 - An ambitious and innovative council delivering quality services at the right time and in the right place</p>	<ul style="list-style-type: none"> • have a direct impact on overall spend, savings, value for money and the cost of service provision to the people of Blaenau Gwent; • help shape the delivery of services to meet the needs of citizens, communities and customers; • contribute to the achievement of corporate and service objectives; and
<p>Priority 4 - Empowering and supporting communities to be safe, independent and resilient</p>	<ul style="list-style-type: none"> • be part of the process of delivering key policy objectives. <p>We are committed to the delivery of social value, and the development of the local and national foundational economies and we believe that the outlined commercial strategy will allow us to take Blaenau Gwent into the future by making Blaenau Gwent a community which maximises learning and skills for all, embraces environmental change, supports economic business growth, works in partnership to provide high quality services to meet local needs and improves the quality of life and well-being within the community.</p>

Section 4-Well-being of Future Generations (Wales) Act 2015 – The Five Ways of Working (ICLIP)
Sustainable development principles. The WCFG Act requires the Council to consider how any proposal improves the economic, social, environmental and cultural well-being of Wales using the five ways of working as a baseline)

Five Ways of Working	How have you used the Sustainable Development Principles in forming the proposal?
<p>Long Tern</p> 	<p>Consider the long-term impact of the proposal on the ability of communities to secure their well-being.</p> <p>The Commercial Strategy puts delivering economic, environmental, social and cultural well-being at the heart of what we do. How effectively we evolve into a commercial minded organisation and how we spend our money will have a direct impact on our ability to deliver our ambition and priorities now and in the future. Thus, the Council recognises that an effective an effective commercially minded strategy is fundamental to achieving organisational success and is instrumental in the delivery of the Corporate Plan, as it will:</p>
<p>Prevention</p> 	<ul style="list-style-type: none"> • have a direct impact on overall spend, savings, value for money and the cost of service provision to the people of Blaenau Gwent; • help shape the delivery of services to meet the needs of citizens, communities and customers;
<p>Integration</p> 	<ul style="list-style-type: none"> • contribute to the achievement of corporate and service objectives; and • be part of the process of delivering key policy objectives. <p><u>Through the commercial strategy we will ensure</u></p>

Collaboration



Involvement



- to address and consider the seven Well-being Goals and Five Ways of Working from the [Well-Being of Future Generations \(Wales\) Act 2015](#).
- embrace the opportunity presented to deliver further well-being benefits for the people of Blaenau Gwent through the supplier selection and award of contracts.
- The Council’s pledge of a [Climate Emergency](#) has placed additional responsibility on the role of Procurement within the Council and in delivering on these important agendas.
- We will start to include the principles of [Welsh Government’s Circular Economy Strategy](#) which will ensure a greener, fairer and more prosperous community in Blaenau Gwent.
- We support the development of the [Foundational Economy](#) in Blaenau Gwent which encourages us to develop new and existing supply chains to bid and to be successful in future council contracts.
- We will ensure as many of our suppliers and providers commit to Welsh Government's Ethical Procurement with reference to the [Code of Practice](#).
- We will ensure [Community Benefits and/or Social Value](#) Themes Outcomes and Measures (**TOMs**) are considered within all sourcing strategies to maximise the delivery of social value for our local communities.
- To making further use of technology in support of the Council becoming a more modern, dynamic organization

How does your proposal link to the Welsh Governments Priorities for Wales? Please indicate below.

1. **A PROSPEROUS WALES** ... an innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.

The Strategy promotes socially responsible processes including:

- Ensuring legal compliance and robust and transparent governance by ensuring Council staff have awareness of, and comply with, relevant legislation and the Council's Contract Procedure Rules.
- Promoting socially responsible activities and processes by increasing community and social value benefits delivered by us and delivery suppliers;
- Contributing to the Council's aim to be a Net Zero Council by 2030 by embedding a procurement process that addresses climate change and a circular economy approach.
- Improving Fair Work & Safeguarding practices within our supply chain by ensuring that fair work principles are promoted across the Council and procurement processes increase fair work practices that help tackle poverty and inequality.
- Securing value for money and managing demand through effective and robust contract management arrangements.
- Making procurement spend more accessible to local small businesses and third sector organisations;
- Ensuring that procurement decisions consider how local market can best be supported;
- Promoting innovative & best practice solutions
- Becoming and supporting the organisations as a whole to be commercially minded

2. **A RESILIENT WALES ...** a nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change). Think about how your activity will have regard to protecting and enhancing biodiversity.

The Strategy promotes socially responsible processes including:

- Ensuring legal compliance and robust and transparent governance by ensuring Council staff have awareness of, and comply with, relevant legislation and the Council's Contract Procedure Rules.
- Promoting socially responsible activities and processes by increasing community and social value benefits delivered by us and delivery suppliers;
- Contributing to the Council's aim to be a Net Zero Council by 2030 by embedding a procurement process that addresses climate change and a circular economy approach.
- Improving Fair Work & Safeguarding practices within our supply chain by ensuring that fair work principles are promoted across the Council and procurement processes increase fair work practices that help tackle poverty and inequality.
- Securing value for money and managing demand through effective and robust contract management arrangements.
- Making procurement spend more accessible to local small businesses and third sector organisations;
- Ensuring that procurement decisions consider how local market can best be supported;
- Promoting innovative & best practice solutions
- Becoming and supporting the organisations as a whole to be commercially minded

We also believe the strategy sets out how we as an organisation can think differently, become a business who is commercially minded, who uses their assets to support income, to improve service delivery as well as making us more sustainable in the future, thus supporting us to maintain services and further developed services in the future

3. **A HEALTHIER WALES ...** a society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.

To include all of the above as well as realising that what we are doing not only contributes to the current communities but the communities of our future. By being commercially minded we could increase maintain or increase employment opportunities which will have wider benefits of health within our communities. Being more commercially minded could support us as an organisation to become more sustainable, leaving us less vulnerable to any future cuts as well as allowing us to maintain and potentially enhance services into the future.

4. **A MORE EQUAL WALES ...** A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).

As above

- Improving Fair Work & Safeguarding practices within our supply chain by ensuring that fair work principles are promoted across the Council and procurement processes increase fair work practices that help tackle poverty and inequality.
- Securing value for money and managing demand through effective and robust contract management arrangements.
- Making procurement spend more accessible to local small businesses and third sector organisations;
- Working with our service users to understand and enhance service design, allows out services to be fit for purpose as well as ensuring they are accessible for all.

5. **A WALES OF COHESIVE COMMUNITIES ...** attractive, viable, safe and well-connected communities.

By being a more commercially minded organisation we will create opportunities for growth both as an organisation and our communities. By involving our communities in service design we will be able to shape services to meet the needs of the community, making them more accessible which will in turn ensure Blaenau Gwent is a place where people want to come to live and work.

6. **A WALES OF VIBRANT CULTURE AND THRIVING ...** a society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.

The strategy will support national policies and strategies including:

- Well-being and Future Generations Act
- Welsh Procurement Policy
- Social Partnership and Public Procurement (Wales) Act
- Financial/treasury mgt...check with RH
- Decarbonisation Net zero 30 %0
- Digital Strategy for Wales

Whilst delivering this Strategy, we will ensure the decisions we make consider the well-being goals and five ways of working: Long Term, Integration, Involvement, Collaboration and Prevention.

We will ensure that our decisions are evidenced-based and consider the social and economic impact on our communities.

7. **A GLOBALLY RESPONSIBLE WALES ...** a nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.


The strategy sets out

- Managing 3rd party spend through effective procurement, commissioning and contract management;
- Maximizing income opportunities, including fees and charges;
- Digital solutions to drive down cost, increase efficiencies and provide a good customer offer;
- Service redesign and transformation – understanding the customer journey;
- Optimizing investment and development opportunities;

This strategy demonstrates the Council's commitment and investment into becoming a commercially minded organization by:

- supporting learning and developing skills

- providing equal access to services
- identifying and developing the right technology in the right way
- driving further transformation and modern, commercial service delivery models for the Council
- improving collaboration with others to innovative ways to change how we deliver public services

Section 5-Welsh Language (Wales) Measure 2011 and Welsh Language Standards			
<i>(The Welsh Language Measure 2011 and the Welsh Language Standards require the Council to have 'due regard' for the positive or negative impact that any proposal may have on opportunities to use the Welsh language. Welsh Language Standards)</i>			
Requirement	Does the proposal have any positive, negative or neutral impacts in regards to the below?	What can be done to mitigate any negative impacts?	Please demonstrate any evidence used to form this opinion.
Compliance with the Welsh Language Standards. <i>Specifically Standards 88 - 93</i>	<p>The strategy requires officers to consider the WLS in their individual commissioning and procurement activities to;-</p> <ul style="list-style-type: none"> • Improve the services Welsh-speakers can expect to receive from specified organisations in Welsh; 	<p>Regular monitoring on the application of the strategy will mitigate any negative impacts.</p>	<p>Procurement opportunities are advertised bilingually</p> <p>Bidders are permitted to respond either in Welsh or English</p> <p>Individual specifications, consider WL</p>
What opportunities are there to promote the Welsh Language? <i>e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community</i>			
What opportunities are there for a person or person to use the Welsh Language? <i>e.g. staff, residents and visitors</i>			

<p>Has the Welsh Language been considered in order to treat the Welsh language no less favourably than the English language?</p>	<ul style="list-style-type: none"> • Increase the use people make of Welsh-language services; • Make it clear to organisations what they need to do in terms of the Welsh language; and • Ensure that there is an appropriate degree of consistency in terms of the duties placed on bodies in the same sectors. 		
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Section 6 – Children’s Rights Approach - [The Right Way](#)

The Children’s Rights Approach – The Right Way is a framework for working with children, grounded in the UN Convention on the Rights of the Child (UNCRC). It places the UNCRC at the core of planning and service delivery and integrates children’s rights into every aspect of decision-making, policy and practice. The Right Way focuses on three main them Participation, Provision and Protection.

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Protected characteristics	Will the proposal have any positive impacts on the Children’s Rights Approach?	Will the proposal have any negative impacts on the Children’s Rights Approach?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
<p>Participation (child or young person as someone who actively contributes to society as a citizen)</p>	<p>The commercial strategy is designed to ensure that any decisions taken have the best possible outcomes for the organisation and the community. We will use the strategy in line with integrated impact</p>		<p>It is the Council’s responsibility to manage money efficiently and effectively to achieve Council objectives. The purpose of this strategy is to set out how we are undertaking becoming a more commercially minded organisation to provide the vision and strategic direction necessary to better achieve our objectives.</p> <p>This strategy aligns with the commissioning strategy which aims to promote effective commissioning and procurement across the whole organisation.</p>
<p>Provision (the basic rights of children and young people to survive and develop)</p>			

<p>Protection (children and young people are protected against exploitation, abuse or discrimination)</p>	<p>assessment process to allow officers to understand any impacts a decision taken may have on Children & Young People. Any decisions taken will look to support C & YP to:-</p> <ul style="list-style-type: none"> • Actively contribute to society • Access services and support that meet their needs • To remain safe and provide protection 		<p>It is felt through this focussed commercial strategy we will help to make Blaenau Gwent a community which maximises learning and skills for all, embraces environmental change, supports economic business growth, works in partnership to provide high quality services to meet local needs and improves the quality of life and well-being within the community.</p>
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Section 7– Community Safety

Duty to Consider Crime and Disorder Implications

Section 17 of the Crime and Disorder Act 1998 places a duty on the local authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder, anti-social and other behaviour adversely affecting the local environment, the misuse of drugs, alcohol and other substances, re-offending and serious violence.

Impacts	Will the proposal have any positive impacts on crime and disorder?	Will the proposal have any negative impacts on crime and disorder?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
Crime (consider impact on each: victims, offenders and neighbourhoods)	We believe if the strategy is followed along with the Integrated Impact Assessment process, decisions take will look at the potential positive or negative impacts in order to understand fully the implications of decisions being made to align the corporate objectives and achieve positive outcomes for the community of Blaenau Gwent		Note: the commercial strategy has been developed as a forward thinking to support Blaenau Gwent as organisation to fulfill its duties on providing services that meet the needs of those communities. The strategy will sit alongside our Integrated Impact Assessment process to allow officers to consider positive/negative impacts and how this aligns to Blaenau Gwent achieving its vision to “Increase in the resilience of Communities, where everyone is welcome and safe and which minimises dependency and maximises independence” <ul style="list-style-type: none"> • Tackle racism, discrimination and their outcomes
Anti-Social Behaviour and behaviour adversely affecting the local environment (consider impact on each: victims, offenders, neighbourhoods and green spaces)			
Misuse of drugs, alcohol and other substances			

<p>(Think vulnerable children, adults, families and communities)</p>			<ul style="list-style-type: none"> • We want to create a Gwent that has friendly, safe and confident communities • To support crime reduction whilst also implementing preventative measures to ensure long-term reductions in crime and disorder, with a focus on Integration
<p>Re-offending (Think young people and adults, victims, families, communities)</p>			
<p>Serious Violence (Think vulnerable young people, vulnerable adults, victims, families, communities)</p>			
<p>Counter Terrorism (People and places that are vulnerable to terrorism or violent extremism)</p>			
<p>Community Cohesion (Asylum seekers, Migrants, Victims or Hate Crime, Community tensions)</p>			

Section 8- Armed Forces Covenant Duty [AFC Draft Statutory Guidance - Final.pdf](#)

Impacts	Will the proposal have any positive impacts on the armed forces community?	Will the proposal have any negative impacts on the armed forces community?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
<p>Health</p> <ul style="list-style-type: none"> • Provision of services • Planning and funding • Co-operation between bodies and professionals <p>These healthcare functions are within scope of the Duty in the following settings:</p> <ul style="list-style-type: none"> • NHS Primary Care services, including general practice, community pharmacies, NHS dental, NHS optometry services and public health screening services. 	<p>We believe if the strategy is followed along with the Integrated Impact Assessment process, decisions take will look at the potential positive or negative impacts in order to understand fully the implications of decisions being made to align the corporate objectives and achieve positive outcomes for the community of Blaenau Gwent</p>		<p>Note: the procurement strategy has been developed as a forward thinking to support Blaenau Gwent as an organisation to fulfill its duties on providing services that meet the needs of those communities. The strategy allows officers to consider positive/negative impacts and how this aligns to Blaenau Gwent achieving its vision to</p> <ul style="list-style-type: none"> • Create fair employment and good work for all • Ensure a healthy standard of living for all • Create fair employment and good work for all • Give every child the best start in life • Enable all children, young people and adults to maximise their capabilities and have control over their lives

<ul style="list-style-type: none"> • NHS Secondary Care services, including urgent and emergency care, hospital and community services, specialist care, mental health services, and additional needs services (as applicable). • Local authority-delivered healthcare services, including sexual health services and drug and alcohol misuse services 			
<p>Education</p> <ul style="list-style-type: none"> • Admissions • Educational attainment and curriculum • Child wellbeing • Transport • Attendance • Additional needs support • Use of Service Pupil Premium funding (England only) 			

<p>These education functions are within scope of the Duty in compulsory education settings, that is, primary, secondary, and, for England only, compulsory further education. The Duty does not cover nursery (early years education), higher education, or other voluntary adult education settings</p>			
<p>Housing</p> <ul style="list-style-type: none"> • Allocations policy for social housing • Tenancy strategies (England only) • Homelessness • Disabled Facilities Grants 			

Section 9-Data-Please outline any data or evidence that has been used to develop the proposal, this can be previous consultations, local/national data, pilot projects, reports, feedback from clients etc.

Data/evidence –What data/evidence was used? - provide any links.	What were the key findings?	How has the data/evidence informed this proposal?
		<ul style="list-style-type: none"> -WIMD data -Local intelligence -Covid community impact assessments -Local data resources -Reports both national and local -Internal survey

Are there any data or information gaps and if so what are they and how do you intend to address them?

Section 10-Consultation. Please provide details of consultation undertaken to support the proposal. Please consider the Gunning Principles: -

Principle 1: Consultation must take place when the proposals are still at a formative stage. You must not have already made up your mind.

Principle 2: Sufficient reasons must be put forward to allow for intelligent consideration and response. Have people been given the information and opportunity to influence?

Principle 3: Adequate time must be given for consideration and response. Is the consultation long enough bearing in mind the circumstances?

Principle 4: The product of consultation must be conscientiously taken into account when finalising the decision

Briefly describe any planned consultations or consultations that have been carried out to date. Please consider the above principles.

Please consider the following questions; -

1. Who did you consult?

2. When did the consultation take place and was adequate time given for a response?

3. Was there enough information provided to respond effectively?

4. What were the findings?

The key themes and priorities to this strategy have been developed through user engagement with customers, staff engagement, senior management workshops, elected member engagement sessions, discussions with public sector partners including WLGA, SOLACE and CIPFA. Recommendations made by Audit Wales have also been integrated into this document as has Welsh Government and UK Government policy and obligations.

Have the findings been considered in regards to the decision?

The comments and findings were considered and included within the current strategy.

Section 11-Monitoring and Review	
How will the implementation of the proposal be monitored, including the impacts or changes made?	The Strategic Commercial Commissioning Board will oversee the delivery of this Commercial Strategy.
What monitoring tools will be used?	<p>This strategy is one of a set of strategic commercial programmers designed to secure the future sustainability across the community and deliver improved outcomes for our residents and businesses.</p> <p>A set of quantitative and qualitative metrics and performance measures will be developed and reported via the established democratic processes.</p> <p>In addition, the strategy will be subject to a mid-term review to ensure we keep pace with on-going changes to commercial innovation, technologies and customer expectations.</p>
How will the results be used for future development?	Results will be considered as part of the continued application of the Strategy and where relevant will be incorporated into future version.
How and when will it be reviewed?	
Who is responsible for ensuring this happens?	Chief Officer

Section 12 - Decision

Using the information you have gathered from sections 1-9 please state in the table below whether you are able to proceed with the proposal.

Continue with the proposal in its current form	Yes ✓	No <input type="checkbox"/>
Continue with proposal but take into account reasonable steps to mitigate any negative impacts of the proposal	Yes ✓	No <input type="checkbox"/>

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Name of person completing the IIA

Name:	Lee Williams
Job Title:	Service Manager Business & Commercial
Date:	2 nd April January 2024

Head of Service Approval

Name:	Bernadette Elias		
Job Title:	Chief Officer Commercial and Customer		
Signature:		Date:	2 nd April 2024

Please contact Policy & Partnerships should you require any further advice or guidance on completing your assessment via lissa.friel@blaenau-gwent.gov.uk or emma.scherptong@blaenau-gwent.gov.uk.

Agenda Item 6

Cabinet and Council only

Date signed off by the Monitoring Officer: 22/04/2024

Date signed off by the Section 151 Officer:

Committee: **Cabinet**
Date of meeting: **29th April 2024**
Report Subject: **Anti-Fraud, Anti-Corruption & Anti-Bribery Policy**
Portfolio Holder: **Cllr Steve Thomas – Leader / Cabinet Member for Corporate Overview and Performance**
Report Submitted by: **Louise Rosser – Audit and Risk Manager**

Reporting Pathway								
Directorate Management Team	Corporate Leadership Team	Portfolio Holder / Chair	Governance & Audit Committee	Democratic Services Committee	Scrutiny Committee	Cabinet	Council	Other (please state)
	04/04/2024		17/04/2024			29/04/2024		

1. **Purpose of the Report**
 - 1.1 The purpose of this report is to present to the Cabinet the revised Anti-Fraud, Anti-Corruption & Anti-Bribery Policy attached at Appendix A.
2. **Scope and Background**
 - 2.1 The policy has been revised to reflect the current legislation and the current reporting structure of the Authority. The policy was endorsed by the Governance and Audit Committee on 17.04.24, subject to some minor amendments and the addition of a flowchart.
3. **Options for Recommendation**
 - 3.1 The Cabinet consider and challenge the content of the policy ensuring it is consistent with their knowledge and understanding of the wider issues.
 - 3.2 The Cabinet may then choose to:
Option 1
To support the policy and agree it's adoption.
Option 2
Propose amendments / alterations to the Policy prior to approving it.
4. **Evidence of how this topic support the achievement of the Corporate Plan / Statutory Responsibilities / Blaenau Gwent Well-being Plan**
 - 4.1 This report supports the Authority in achieving its Corporate Plan Priority of an ambitious and innovative council delivering quality services at the right time and in the right place through demonstrating that adequate measures are in place for the prevention and detection of fraud, by protecting the Authority's assets.

5. Implications Against Each Option

5.1 Impact on Budget (short- and long-term impact)

5.1.1 There are no direct financial implications arising from this report, although the detection and prevention of fraud contribute to ensuring the proper use of resources.

5.2 Risk including Mitigating Actions

5.2.1 Failure to meet its obligations in respect of preventing fraud, corruption and bribery exposes the Authority to a variety of risks including financial loss and reputational damage. Development of, and adherence to, this policy assists in mitigating these risks as part of the Governance Framework.

5.3 Legal

5.3.1 Adoption of the policy ensures compliance with the various legislation referred to in the policy in relation to financial crime.

5.4 Human Resources

5.4.1 There are no direct Human Resource implications arising from this report. Responsibilities for the prevention and detection of fraud, corruption and bribery sit within the existing roles of officers.

6. Supporting Evidence

6.1 Performance Information and Data

6.1.1 There are no performance information and data implications arising from this report.

6.2 Expected outcome for the public

6.2.1 An effective Anti-Fraud, Anti-Corruption and Anti-Bribery Policy contributes to the protection of public funds and the prevention and detection of criminal activity.

6.3 Involvement (consultation, engagement, participation)

There are no direct implications under involvement.

6.4 Thinking for the Long term (forward planning)

Adoption of the policy enhances the internal control environment and financial resilience of the Authority.

6.5 Preventative focus

Adoption of the policy enhances the internal control environment and financial resilience of the Authority.

6.6 Collaboration / partnership working

Not applicable.

6.7 Integration (across service areas)

Not applicable

6.8 Decarbonisation and Reducing Carbon Emissions.
Not applicable

6.9 Integrated Impact Assessment
Not applicable

7. **Monitoring Arrangements**

7.1 There are no further monitoring arrangements required for this report.

Background Documents /Electronic Links

- Appendix A – Anti-Fraud, Anti-Corruption and Anti-Bribery Policy

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ANTI-FRAUD, **ANTI-CORRUPTION,** **& ANTI-BRIBERY POLICY**

Last Revised: March 2024
Date of Next Review: March 2027

1 INTRODUCTION

- 1.1** Blaenau Gwent County Borough Council advocates strict adherence to its anti-fraud framework and associated policies. In the majority of cases this would be a zero-tolerance approach to all forms of fraud, corruption and theft, arising both from within the Council and externally. The Council wishes to hold a good reputation for protecting the public purse. Sound systems of public accountability are vital to effective management and in maintaining public confidence. We are committed to protecting the public funds entrusted to us. The minimisation of losses due to fraud, corruption and bribery is essential for ensuring the maximum resources available are used for providing services to the citizens of Blaenau Gwent. The general principles and procedures for corporate governance embrace the assumption that fraud, corruption and bribery must be prevented, and any occurrence must be dealt with severely. This policy sets out why and how this will be done.
- 1.2** The Council's expectations on propriety and accountability are that Members and officers at all levels will lead by example in ensuring adherence to the principles of good governance and propriety, including careful observance of procedures, rules, legal requirements, and open and proper practices.
- 1.3** The Council also expects that individuals and organisations that it comes into contact with (e.g. partners, suppliers, contractors, service providers and service users) will act towards the Council with integrity and without thought or actions involving fraud, corruption or bribery.
- 1.4** For the purpose of this policy the following definitions are used:
- Fraud – “the intentional distortion of financial statements or other records by persons internal or external to the Council which is carried out to conceal the misappropriation of assets or otherwise for gain”.
 - Corruption – “the offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person”.
 - Bribery – “an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage”.
- 1.5** In administering its responsibilities, the Council aims to prevent fraud, corruption and bribery, whether it is attempted on the Council from the outside or inside. The Council is therefore committed to adhering to the principals of the Cipfa Anti-Fraud Strategy
- 1.6** The Bribery Act 2010 has four key offences (as worded):
- Bribery of another person – making it an offence to offer, promise or give a bribe.
 - Accepting a bribe – making it an offence to request, agree to receive, or accept a bribe.
 - Bribing a foreign official – with the intention of obtaining or retaining business or an advantage in the conduct of business
 - Failing to prevent bribery – this is a corporate offence of failing to prevent bribery that is intended to obtain or retain business, or an advantage in

the conduct of business, for the organisation.

- 1.7** Under the Bribery Act, individuals found guilty of an offence may be liable to imprisonment of up to 10 years. Additionally, the Council may be liable for fines if found guilty of failing to prevent bribery.
- 1.8** The Council's Anti-Fraud, Anti-Corruption and Anti-Bribery Policy is based on a series of comprehensive and inter-related procedures designed to frustrate any attempted fraudulent or corrupt act and covers:
- Corporate Framework and Culture
 - Prevention
 - Detection and Investigation
 - Reporting
 - Training
- 1.9** The Council is also aware of the high degree of external scrutiny of its affairs by a variety of bodies and people including:
- Audit Wales
 - The Public / Council Taxpayer – Annual Inspection of the Accounts
 - The Public / Service Users – through various Complaints procedures
 - Welsh Government / UK Government
 - The Public Services Ombudsman for Wales
 - His Majesty's Revenue & Customs
 - Department for Work and Pensions
 - Other external regulators
- 1.10** As part of Audit Wales' statutory duties they are required to seek assurance that the Council has in place adequate arrangements for the prevention and detection of fraud, corruption and bribery.

2. CORPORATE FRAMEWORK AND CULTURE

- 2.1** The Council is determined that the culture and tone of the organisation is one of honesty and opposition to fraud, corruption and bribery. There is a framework of interrelated policies and procedures that provide a corporate framework to counter fraudulent activity. These have been formulated in line with appropriate legislative requirements and include:
- Codes of Conduct for Officers and Members,
 - Effective delegation arrangements
 - Appointment of Statutory Officers
 - Contract Procedure Rules and Financial Procedure Rules
 - Robust and accurate accounting procedures and records
 - Sound internal control systems and the Annual Governance Statement
 - Effective Internal Audit
 - Effective recruitment and selection procedures
 - The Disciplinary Procedure
 - The Whistle Blowing Policy
 - The Anti Money Laundering policy

- The Information Security Policy
- Training
- Risk Management Framework
- Performance Management Framework

2.2 The Council believes that the maintenance of a culture of honesty and openness is a key element in tackling fraud. The Codes of Conduct for Officers and for Members are based on the Nolan Principles of Standards in Public Life (Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty, and Leadership). Failure to uphold these Codes will be considered detrimental to the achievement of corporate goals and will lead to the appropriate action being taken against those concerned.

2.3 Members are required to operate within the:

- Conduct of Members (Model Code of Conduct) (Wales) Order 2008
- Sections 94-96 of the Local Government Act 1972
- Blaenau Gwent County Borough Council's Constitution
- The Local Government Act 2000 (which requires Members to give a written undertaking to comply with the Code of Conduct, and to complete entries in a formal Register where required under the provisions for Registration of Gifts and Hospitality).

2.4 These matters and other guidance are brought to the attention of Members at the induction course for new members. They include rules on the declaration and registration with the Head of Legal and Corporate Compliance of potential areas of conflict between Members' Council duties and responsibilities and any other areas of their personal or professional lives.

2.5 There are provisions within the Overview and Scrutiny Committees and the Standards Committee processes for Members to refer particular concerns regarding propriety for consideration. Equivalent arrangements for staff are set out in the Whistle Blowing Policy and the Code of Conduct for Officers.

2.6 To enable staff in any Department to express their concerns in a confidential manner, the Whistle Blowing Policy provides an additional route other than the Line Manager or Section Head, which is available to all staff throughout the Council, that contact being the Audit and Risk Manager (Tel: 01495 364827), who will, if necessary, arrange for the matter to be investigated.

2.7 Members of the public are also encouraged to report concerns to the Audit and Risk Manager or, if appropriate, through the Council's Complaints Procedure. A specific telephone number is available to report concerns to Internal Audit on 01495 364827. (The Audit and Risk Manager will arrange for the allegation to be investigated and, where appropriate, issue a report to the Chief Officer concerned).

3. PREVENTION

3.1 Employees

3.1.1 The Council recognises that a key preventative measure in the fight against fraud, corruption and bribery is to take effective steps at the recruitment stage

to establish, as far as possible, the previous record of potential employees in terms of propriety and integrity. In this regard, temporary and contract employees should be treated in the same manner as permanent employees. Formal references will be taken up, and where appropriate Disclosure Barring Service checks will be made.

- 3.1.2** Officers are required as part of their contracts of employment to comply with the Officers Code of Conduct. Employees are also reminded that they must comply with Section 117 of the Local Government Act 1972, regarding the disclosure of pecuniary interest in contracts relating to the County Borough Council or the non-acceptance of any fees or rewards whatsoever other than their proper remuneration. A Register of Potential Conflicts of Interest should be maintained by every Council Department for recording these or any other interests that may be interpreted by a reasonable observer as a potential conflict of interest.
- 3.1.3** Employees who are found to have committed any fraudulent activity against the Council, including claiming Housing / Council Tax Benefit or Single Person Discount which they are not entitled to, will be referred to Organisational Development for appropriate action in accordance with approved policies and procedures.

3.2 Internal Control Systems

- 3.2.1** The County Borough Council has Contract Procedure Rules and Financial Procedure Rules in place that require employees dealing with Council's affairs to act in accordance with best practice.
- 3.2.2** The Chief Officer Resources has a statutory responsibility under Section 151 of the Local Government Act 1972 to ensure arrangements for the proper administration of the Council's financial affairs. The Council has in place Financial Codes of Practice and Accounting Instructions which underpin Financial Procedure Rules, and outline the system, procedures and responsibilities of employees in relation to the Council's financial activity.
- 3.2.3** The Chief Officer of Resources also maintains a "Head of Profession" role within the Council through the work of the Resources Service which applies a quality control on financial administration.

3.3 Combining with Others to Prevent and Fight Fraud

- 3.3.1** Arrangements are in place to encourage the exchange of information between the Council and other agencies on the national and local fraud and corruption activities in relation to Local Authorities.
- 3.3.2** With the rapid increase in recent years of frauds perpetrated against a variety of Local Authorities and benefit agencies, the necessity to liaise between organisations has become paramount. Some of the organisations the Council liaises with are: -

- Police
- Chief Internal Auditors Groups
- Welsh Benefits Investigations Groups

- National Anti-Fraud Network
- External regulators or specifically AW
- HMRC Investigation Teams
- Department for Work & Pensions

4. DETECTION AND INVESTIGATION

- 4.1** Despite the best efforts of Managers and Auditors, many frauds are discovered through “tip-off” and the Council has in place arrangements to enable such information to be dealt with. These have been explained earlier in this document.
- 4.2** Employees of the Council are required by the Code of Conduct to report all suspected irregularities to their Chief Officer, or if not appropriate, to the Chief Officer Resources who has delegated this responsibility to the Audit and Risk Manager. Reporting suspicious activity is a legal obligation under the Anti-Money Laundering Regulations. Prompt reporting is essential to the Anti-Fraud, Anti-Corruption and Anti-Bribery Policy and ensures:
- Consistent treatment of information regarding fraud, corruption and bribery
 - Proper investigation by an independent and experienced audit team
 - The proper implementation of a fraud response and investigation plan
 - The optimum protection of the Council’s interests
 - Minimisation of potential continuing losses
 - Good management of the Council’s public relations.
- 4.3** Depending on the nature and the anticipated extent of the allegations, the Internal Audit Section will normally work closely with Management and other agencies, such as the Police, to ensure that all allegations and evidence are properly investigated and reported upon, and where appropriate, maximum recoveries are made for the Council. Investigations will be conducted within the parameters of relevant legislation, such as the Regulation of Investigatory Powers Act.
- 4.4** The Council’s Disciplinary Procedure will be used where the outcome of the Internal Audit investigation indicates improper behaviour.
- 4.5** Where suspected financial impropriety is discovered, the Chief Officer Resources and the Head of Legal and Corporate Compliance may refer the matter to the Police. All instances of bribery will be referred to the Police. Suspicions of money laundering will be referred to the Serious Organised Crime Agency by the Council’s Money Laundering Reporting Officer, who is the Chief Officer Resources. The Crown Prosecution Service determines whether a prosecution will be pursued. Referral to the Police will not prohibit action under the Disciplinary Procedure.
- 4.6** The External Auditor, Audit Wales, also has powers independently to investigate fraud, corruption and bribery, and the Head of Legal and Corporate Compliance may also use its services for this purpose.

5. TRAINING

- 5.1** The Council recognises that the continuing success of its Anti-Fraud, Anti-Corruption and Anti-Bribery Policy will depend largely on the responsiveness of employees throughout the organisation.
- 5.2** To facilitate this, the Council implements an induction process and post entry training, particularly for employees involved in internal control systems, to ensure that their duties and responsibilities in this respect are regularly highlighted and reinforced. The possibility of disciplinary action against employees who ignore such training and guidance is clear.
- 5.3** The investigation of fraud, corruption and bribery centres on the Internal Audit Section within the Resources Service. It is important therefore, that employees involved in this work should also be properly and regularly trained.
- 5.4** Where necessary, the Council is also able to engage other outside specialists to complement, support or enhance the inhouse resource as required.

6. EQUALITIES IMPACT

- 6.1** Fraud, corruption and bribery are criminal offences and as such the Council has a statutory duty to protect public revenue. The intended beneficiaries of this policy are employees, taxpayers and the general public as a whole.
- 6.2** Officers will always act with respect to pertinent legislation and without prejudice when executing the Council's procedures and policies.
- 6.3** The personal beliefs, race, gender or debilitation of anyone subject to or involved in an investigation is not an issue when conducting an investigation.
- 6.4** Investigations will be executed with deference to pertinent legislation and with full regard for all human rights as stated in the Police and Criminal Evidence Act 1984, the Criminal Procedure and Investigations Act 1996, the Human Rights Act 2000, and any subsequent relevant legislation.
- 6.5** Where there are any discrepancies between this policy and legislation, then legislation will prevail.

7. REPORTING

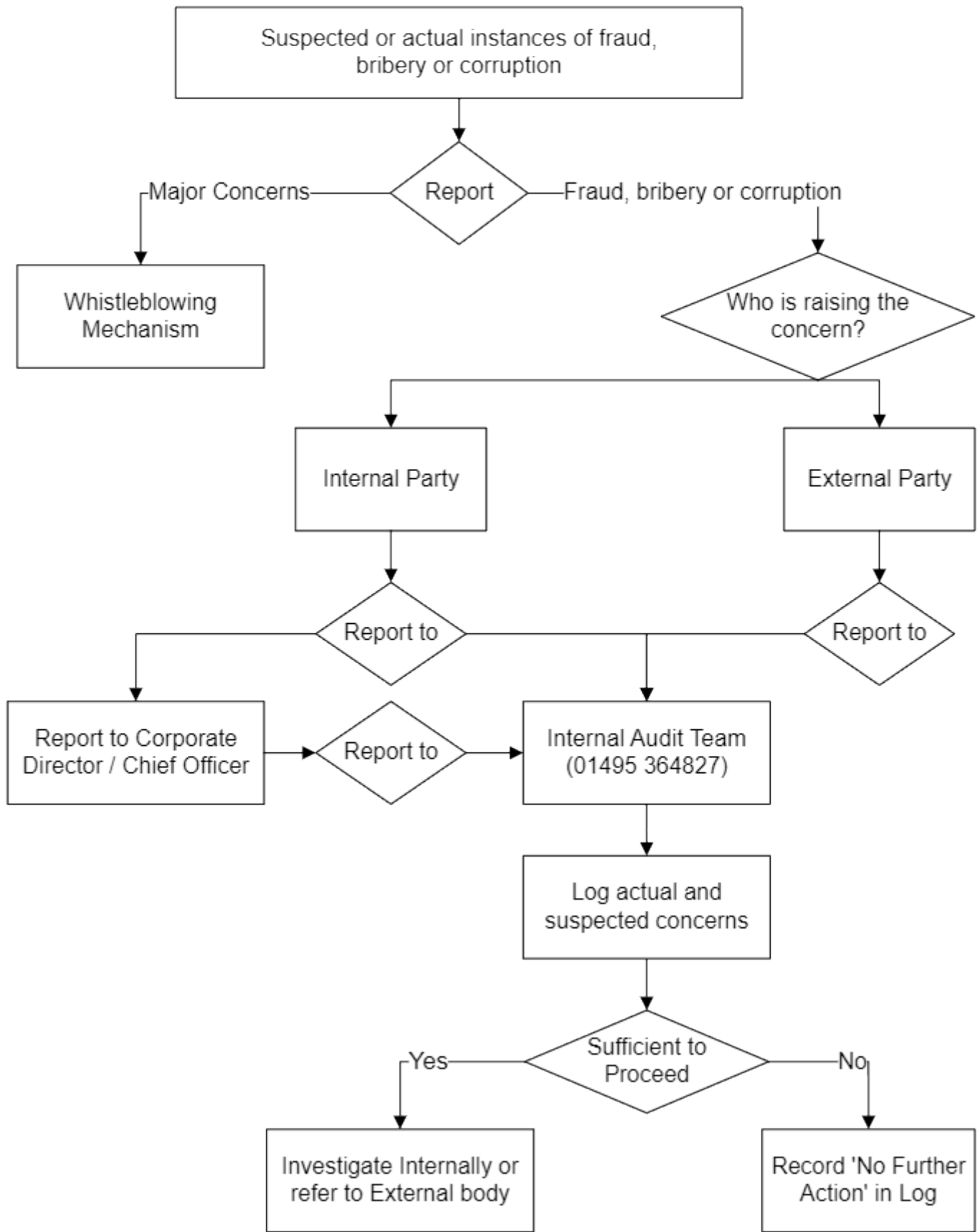
- 7.1** All staff must immediately report any suspected or actual instances of fraud, bribery or corruption. This includes offers to pay bribes, solicitation of bribes and demands to make facilitation payments. Failure to report could result in disciplinary action.
- 7.2** Reports should be made to an appropriate manager or to Internal Audit.
- 7.3** The Council also requires all those receiving the Council's funds or representing the Authority, including its suppliers, grant recipients, partners, contractors and agents, to report any suspected or actual instances of fraud,

bribery or corruption involving the Council's assets or staff. Reports should be made to the Internal Audit Service via 01495 364827. In addition, the Authority has a Whistleblowing Policy that can be utilised to raise major concerns that fall outside the scope of other procedures.

- 7.4** The Council will not penalise anyone for raising a concern in good faith, even if it turns out to be unfounded. Any member of staff who harasses or victimises someone for raising a concern in good faith will themselves be subject to disciplinary action.

- 7.5** The Council will maintain a system for recording: all reports of actual or suspected fraud, bribery and corruption; the action taken; and the outcome of any investigation. It will use this information to inform its review of the risks and the effectiveness of its controls.

Appendix 1 - Reporting a Suspicion or Concern



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