



# South Cambridgeshire District Council:

## Appendix A

### Counter Fraud and Error Strategy Statement

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## Values

We are:



**Ambitious**



**Collaborative**



**Compassionate**



**Accountable**

### **Ambitious**

We are proactive and take a forward-thinking approach to addressing challenges:  
We create smart solutions and reach our goals with determination and a clear vision.

### **Collaborative**

We foster a culture of teamwork and open communication:  
We work with and involve stakeholders, to improve how the organisation works and serves the public.

### **Compassionate**

We prioritise empathy and understanding in decision-making and service delivery:  
We consider the wellbeing of people and communities in everything we do and we replicate this when we talk to our colleagues because we know that when we support each other, we all do better.

### **Accountable**

We take responsibility for our actions and decisions:  
We own up to mistakes and make sure we fulfil our commitments.



## Introduction

The impact of fraud is far reaching beyond financial loss. South Cambridgeshire District Council ('the council') serves to improve the lives and wellbeing of residents and communities within South Cambridgeshire.

Vulnerable groups rely upon our support and provision of services. Where services and resources are misdirected by those perpetrating fraud, these groups are further disadvantaged.

'The council', recognises its fiduciary role to protect public funds and to mitigate the risk of fraud by operating suitable control measures, monitoring risk, and pursuing redress for those who attempt to deliberately defraud the public purse.

Without adequate response to fraud, fraudulent behaviour can spread, alongside the perception that fraud is acceptable. Lack of fraud controls can result in damage to professional reputation and loss of trust with other public bodies and colleagues.

For these reasons South Cambridgeshire District Council is committed to combatting fraud and corruption. Maintaining resilience to fraud and corruption is a priority within the Finance Team service plan and is also reflected within the council's overarching corporate Business Plan.

This document sets out the council's strategy to tackle fraud and will be reviewed every two years to ensure it remains current.

## Purpose and Approach

The council's approach to achieving our vision is based upon five key pillars of activity outlined in the CIFAS Fighting Fraud and Corruption Locally Plan. [FFCL - Strategy for the 2020's.pdf](#) ([cifas.org.uk](http://cifas.org.uk))



The council will implement secure systems and adopt robust processes when allocating and administering services and resources. The council will also maintain resources and systems to assist in the prevention, detection and investigation of fraud. Achieving positive prevention outcomes and removing potential barriers to success are essential.

### Overarching areas of activity

- Identifying risk of fraud and error, corruption and misappropriation within the business
- Promoting professional standards and probity
- Using advancing technology and data analytics for early identification and prevention of fraud and error
- Investigate reported fraud and administer sanctions and redress
- Delivering value for money
- Provide assurance to the public that we are serious about protecting the integrity of services and remain vigilant against fraud (Public Sector Fraud Authority, 2023)



## **Govern**

### **Culture and Standards**

Good Governance to embed a robust counter-fraud culture is key to combat fraud and corruption. The Nolan principles are enshrined in corporate policy and procedures to promote a counter-fraud culture through process design and conscientious asset and resource management. Annexe A. Nolan Principals.

A quarterly report to the Audit and Governance Committee on performance against the counter fraud strategy will be submitted for scrutiny.

As a 'responsible authority', South Cambridgeshire District Council is a statutory partner of the Community Safety Partnership (CSP). Partners of the CSP include; Police, Health, Probation, Cambridgeshire Fire and Rescue Authority, Cambridgeshire County Council and the Voluntary, Community and Social Enterprise Sector (VCSE).

The Council will work jointly with stakeholders including other local authorities to prevent and detect fraud. Information will be shared with partners and external agencies (where the law permits) to prevent and detect crime.

Breach of process by officers, members or contractors, resulting in material loss to the Council, will result in disciplinary and/or other remedial action.

### **Resources and Performance**

Proactive and responsive approaches will be deployed, in response to counter fraud, that are best suited to South Cambridgeshire District Councils specific risks as identified through processes in the 'acknowledge' section below. Dedicated and coordinated resources are critical to prevent and detect fraud.

Internal Audit and the Fraud Investigation team will maintain an awareness of developments in the field of counter-fraud and review any resource requirements identified in developing the scope of the service.

Performance will be measured and monitored and reported to the Section 151 Officer on a quarterly basis in addition to the Audit and Corporate Governance Committee.



Performance will be measured against;

- Plan Targets
- Annual Fraud Activity Plan
- SCDC values and objectives

## Acknowledge

Fraud cannot be eliminated from systems and procedures. Risk identification is essential to understand specific emerging trends faced by the Council and is routinely considered as part of the Corporate Fraud Risk Register and Internal Audit Framework.

General fraud awareness training and an internal resources page provides information on types of fraud to aide staff in identification and reporting. A shared mailbox is monitored to receive information and reports of fraud from external sources during working hours.

Awareness and vigilance are promoted through provision of easily accessible resources to support the identification of fraud and to confidentially report suspicions of fraud on internal and external platforms.

Intolerance towards fraud will be encouraged within South Cambridgeshire communities through publicity and education to highlight the cost of fraud to the community.

The Police and Crime Commissioner are required to have regard to the CSP priorities within their Police and Crime Plan. And within its 2024/25 Operational Plan, the South Cambs CSP undertakes partnership activity to raise awareness of, and tackle, the issue of Scams, Fraud and Cyber Crime.

## Prevent and Detect

An Organisational (Enterprise) Fraud Risk Assessment provides an overview across business activities to identify the possible areas where the organisation faces exposure to the risk of fraud.

Corporate risk assessment processes identify 'risk owners' for the purpose of testing all controls implemented and re-testing as procedures are adapted.



Identifying risk is the first step for managers or 'risk owners' to review administrative systems and procedures, in place, to ensure their continued suitability as internal arrangements change and external factors have an impact. For example, advances in technology and legislative changes.

The assessment will assist to focus resources towards those areas most at risk of abuse and identify when resources need to be redirected quickly. Changes to the Organisational Fraud Risk Assessment will be notified to the Corporate Fraud Team by Service Managers to:[fraud@scambs.gov.uk](mailto:fraud@scambs.gov.uk).

## Key Area's of Fraud Risk

Risks associated with the cost-of-living crisis provide more incentive to those people struggling to meet financial commitments.

The below areas have been identified as possible areas posing a higher risk of fraud:

- Council Tax Fraud- Current project work has highlighted fraud within the council tax base (specifically Single Person Discount Fraud).
- Housing Fraud - The State of the District - South Cambridgeshire Report January 2024 advises that 'Housing continues to be more expensive in the district than other areas in the county.' This makes abusing social housing and the right to buy scheme an attractive prospect for fraudsters.
- Cyber Crime - Identification of risks associated with cyber fraud, AI and online service delivery are a focus. As technology advances, increased awareness and information must be made available to colleagues around the threat from Generative Artificial Intelligence (AI).
- Insider – data reported by CIFAS indicates that there has been an increase in recorded cases held within the Insider Threat Database between January – September 2023 related to dishonest conduct. This represents a 35% increase compared to the same period in 2022.

A Fraud Activity Plan will be reviewed annually to capture what actions are required by the organisation (in collaboration with the Corporate Fraud Team) to counter fraud, theft, bribery and corruption. Appendix A. The plan includes actions undertaken by the counter fraud function and actions required by the wider business in partnership to support the organisations anti-fraud strategy.





In the next two years the organisation commits to participate in the delivery of the plan by:

- Committing across all areas of the business to reduce fraud and error entering council systems.
- Ensuring due diligence processes are in place to administer service and benefits with assurance.
- Ensure that fraud risk assessment becomes a mandatory practice where new processes and/or schemes are being designed, changed and/or reviewed.
- Working collaboratively to protect assets whilst continuing to deliver the best outcomes for residents and taxpayers.

The Council will participate in data and intelligence analysis exercises hosted by the National Fraud Initiative, Locta Hub (Debt Recovery and Fraud Identification for Local Authorities) LoCTA HUB and Housing Benefit Matching Service.

Where the law allows, the business will share information to facilitate the swift detection of fraud. As well as participating in national exercises, SCDC will participate and lead in local initiatives to produce improved quality data sets and intelligence. Actively seeking opportunities to participate or facilitate local data matching exercises to detect fraud and error across directorates and cross-border localities.

Fraud referrals will be accepted for investigation based on risk and local intelligence, balanced against the likelihood of conducting a successful investigation. Where loss has been identified below a financial threshold ('risk tolerance) from the outset (without the possibility for detection to identify further loss) consideration will be given as to whether conducting further investigation is economical or if low-cost initiatives should be used to reduce repeat loss and recovery.

Residents play an important role in reporting fraud to the service. High impact, low-cost solutions are continually explored to communicate the message to our communities that the council will not tolerate abuse of public funds and services.



Social Media campaigns and signposting to resources are used as part of the Council's prevention messaging along with sanctions and redress.

The outcomes of successful prosecutions will be publicised to raise awareness and provide assurance to communities that the Council takes fraud seriously and to act as a deterrent to others from committing fraudulent activity.

## Protect

This strategy is intended to be considered alongside other council policies and should be read in conjunction with any relevant policies relating to fraud and fraud management, including the Anti-Fraud, Theft, Bribery and Corruption Policy.

The Council will maintain a dedicated Counter Fraud Investigation Team to the main body of colleagues involved in administering funds and services on behalf of the authority. Members of the investigation team will undergo formal training commensurate to grade and role, including refresher training to keep knowledge and skills up to date.

Corporate Membership to the National Anti-Fraud Network (NAFN) for the purposes of securing evidence of fraud and to The Chartered Institute of Public Finance and Accountancy (CIPFA) for industry guidance, will be maintained. Participation in other professional groups will be supported, including (but not limited to), The National Investigation Officers' Group (NIOG).

Registration to professional forums for industry up-dates will also be encouraged i.e. Public Sector Fraud Authority, Fraud Advisory Panel and Tenancy Fraud Forum.

Staff are forbidden from accessing or amending personal records relating to themselves, their relatives, colleagues or friends without prior authorisation in writing from the Head of Service area. This extends to housing applications, benefit and council tax support claims and any other discounts or applications for services and/or grant schemes.

Any person/s found in breach of this protocol will be subject to disciplinary action for gross misconduct. Staff should refer to the 3C ICT Acceptable use Policy and Information Security Policy for full information. Exclusion does not extend to People Team (Itrent) systems for the purposes of accessing employment information.



Recruitment will take place in line with policy to ensure that the appropriate references are sought, and some post holders will be required to undergo further security checks prior to appointment to prevent Insider enabled fraud.

Staff, Members, Contractors, and external agencies play a role in reporting fraud. The service has online and internal platforms to report fraud and existing policy is in place to ensure confidential concerns, 'whistleblowing', can be raised without fear of repercussions.

Colleagues wishing to self-report any wrongdoing whether intentional or in error, can do so by either raising this with their line manager, through the people team [hr@scambs.gov.uk](mailto:hr@scambs.gov.uk) or through the Whistleblowing Policy [Whistleblowing \(sharepoint.com\)](#). Suspicion of serious criminal activity, perpetrated by colleagues, will be reported to Corporate Fraud or Cambridgeshire Police.

## Pursue

Managers should support colleagues to assist with fraud investigations by facilitating time on an ad hoc basis to help Investigators with their enquiries. This may include producing evidence on behalf of the authority to support criminal sanctions by giving statements. Failure to engage in the investigation process may result in disciplinary action.

Officers will investigate referrals of fraud in accordance with legislation governing criminal investigation procedures and practice, with the upmost of professionalism. Investigating officers will make an impartial recommendation to the Corporate Fraud Manager and Legal Services when submitting the summary of investigation report, based on evidence gathered, where a criminal sanction is being recommended.

South Cambridgeshire District Council will operate a proportionate but robust sanction regime. Where the evidential threshold is met for either civil or criminal sanctions to be imposed, recommendations may include a civil penalty fine, disciplinary, dismissal, demotion of banding on housing waiting lists, refusal of a service or funds, possession of property and issue of warnings, or criminal sanctions including administrative penalties, simple caution (subject to provisions contained within The Police, Crime, Sentencing and Courts Act 2022), and prosecution.

Decisions to pursue remedial action will be made by the Corporate Fraud Manager in conjunction with Legal Services and the Section151 Officer. Decisions will be notified to Service Heads for



technical advice and to instigate further civil and recovery processes. This process is to ensure equity, consistency, and transparency across services. This arrangement provides a division of duties between investigating officers and decision makers.

Corporate Fraud will maintain detailed records of all investigations and prevention work securely. Only individuals, authorised by the Section 151 Officer, will have access rights to information contained within Corporate Counter Fraud case management systems for specific purposes.

All colleagues shall maintain accurate and thorough documentation in relation to administration of claims, housing tenancies and advice, and other services within their respective area of business. Where records are found to be inadequate during any investigation this will be highlighted to the Leadership Team and Heads of Service for review.

## Responsibilities

S.151 Officer	Responsibility for overseeing the delivery of the counter fraud strategy. Resolve disputes over implementation of fraud recommendations.
Audit & Corporate Governance Committee	Responsible for ensuring that the Council has a robust counter-fraud culture backed by well designed and implemented controls and procedures which define the roles of management and Internal Audit; and, that the Council monitors the implementation of the relevant policy. Will review the assessment of fraud risks and potential harm to the Council from fraud and corruption, and monitor the counter-fraud strategy, activities and resources.
Heads of Service	Responsible for ensuring that recommendations made to prevent fraud are fully considered and implemented, where agreed, by Managers. Where a recommendation is not accepted a rationale for the decision should be recorded in writing and returned to the Corporate Fraud Manager and Internal Audit.
Service Managers	Duty to protect service area from losses as a direct consequence of fraud, error, and irregularity.



	<p>Responsibility for implementing robust internal controls and security measures and for ensuring that staff adhere to agreed processes when administering public funds and assets on behalf of the Council.</p> <p>Assessment of adequacy, appropriateness and effectiveness of internal controls.</p> <p>To report suspicions that fraud is occurring in line with Council Policy. Allegations relating to a Member of the Council or colleagues should be reported to the Head of Finance i.e. Chief Finance Officer.(*)</p> <p>Responsible for ensuring counter fraud staff are given unhindered access to colleagues, information and other resources as required for investigation purposes.</p> <p>Responsibility to collaborate with the Corporate Fraud Team to complete and to update the Organisational Fraud Risk Assessment and further conduct full fraud risk assessments over new and revised processes/schemes.</p>
Internal Audit	Independently monitor controls as part of their programme of work.
Colleagues	<p>Duty to protect service area from losses as a direct consequence of fraud, error, and irregularity.</p> <p>To report suspicions that fraud is occurring in line with Council Policy. Allegations relating to a Member of the Council or colleagues should be reported to the Head of Finance i.e. Chief Finance Officer. (*)</p> <p>Responsibility to collaborate with the Corporate Fraud Team to complete and to update the Organisational Fraud Risk Assessment and further conduct full fraud risk assessments over new and revised processes/schemes.</p> <p>Responsibility for considering the risk of fraud and abuse within their respective service area and to participate to review control measures and report where risk is deemed to exceed an acceptable level ('risk appetite') to Managers.</p>



	<p>Responsibility to maintain records in relation to day-to-day business processes, subject to meeting the requirements of the Data Protection Act and subsequent regulations relating to record retention.</p>
Members	<p>Duty to protect service area from losses as a direct consequence of fraud, error, and irregularity.</p> <p>To report suspicions that fraud is occurring in line with Council Policy.</p> <p>Allegations relating to a Member of the Council or colleagues should be reported to the Head of Finance i.e. Chief Finance Officer. (*)</p>
Contractors	<p>Duty to protect service area from losses as a direct consequence of fraud, error, and irregularity.</p> <p>To report suspicions that fraud is occurring in line with Council Policy.</p> <p>Allegations relating to a Member of the Council or colleagues should be reported to the Head of Finance i.e. Chief Finance Officer. (*)</p>
People Team	<p>Responsibility for ensuring the suitability of all employees to undertake work on behalf of the Council.</p> <p>Responsibility for overseeing staff wellbeing and staff assistance programmes which may assist to reduce the threat from insider attacks.</p>
3CICT	<p>Information Technology Services maintain responsibility for cyber security throughout the business. It is recognised that data has become a valuable commodity for criminals wishing to commit fraud, with increased attacks from phishing attempts. 3C ICT operate practices to protect council systems from attacks and raise awareness to staff to improve and maintain cyber security within council systems.</p>



(\*) In the absence of the Head of Finance, concerns may be raised with either the Monitoring Officer, Chief Operating Officer, the Chief Executive or, in accordance with the Council's Whistleblowing Policy.

## Bibliography

- [Fraud Act 2006](#)
- CIPFA (2015) [Code of Practice on managing the Risk of Fraud and Corruption](#)
- CIPFA (2020) [Fighting Fraud Corruption Locally](#)
- CIPFA (2020) [Corruption Tracker National Report](#). can be found in this link as a download by The Chartered Institute of Public Finance and Accountancy
- The [Public Sector Counter Fraud Journal](#) (2024)
- The [Seven Principles of Public Life](#) – an overview of the Nolan Principles, the basis of ethical standards expected of public office holders
- [Fraud Prevention Standard for Counter Fraud Professionals](#) (2023) part of the wider government counter fraud standards and guidance
- South Cambridgeshire District Council (2021) [Anti-Theft Fraud and Corruption Policy](#) Approved 2009
- South Cambridgeshire District Council. (2022). [Anti Fraud, Theft, Bribery and Corruption Policy](#). Approved 2009



## Fraud Activity Plan

Objectives	Planned Activity	Delivery	Area Accountable/ Accountable Officer	Individual Officer
Identifying risk of fraud and error, corruption and misappropriation within the business	Capture Processes for Full Fraud Risk Assessment Review - Process Mapping	First 15 process maps completed by October 2024		
	Phase one -Housing Process mapping (Top five - examples- Application process, eligibility verification in relation to Allocations.	1 April - 1 May	Heather Wood - (Housing) Allocations	
	Phase two - Finance Process mapping (Top five processes most frequently used processes and/or based on expenditure by process - examples process around paying supplier invoices)	1 May - 1 June	Farzana Ahmed - Finance	
	Phase three - Revs and benefits mapping (Top five based on frequency and/or expenditure) Example, Applying SPD discount process, NNDR Eligibility determination process, NNDR Review of reliefs etc.	1 June - 1 July	Dawn Graham - Revs and Bens	
	Review Trust ID Contract (Expires 12 July 2024)	May-24	Tara Nutbeam-King Corporate Fraud	Tara Nutbeam-King
	Engage with Transformation Team	TBC	Tara Nutbeam-King Corporate Fraud	Tara Nutbeam-King
Using Advancing technology and data analytics for early identification and prevention of fraud and error	Participation in National Fraud Initiative Exercise	24/25 New matches released January 24	Tara Nutbeam-King Corporate Fraud	Intel Officer
	Pilot - Evaluation of use of APP Check following pilot for use in verifying housing application data		Tara Nutbeam-King Corporate Fraud	Evie Sorakiate
	CCC Fraud Initiative Project and Fraud Hub.		Tara Nutbeam-King Corporate Fraud	





Promote professional standards and probity.	New officer will undertake ACFS training	24/25	Tara Nutbeam-King Corporate Fraud	Iwona Nowakowska
	CCC Fraud Initiative - additional training	24/25	Tara Nutbeam-King Corporate Fraud	Paul Symonds
	Review Intelligence Officer Role	Jul-24	Tara Nutbeam-King Corporate Fraud	Evie Sorakiate
	Design Fraud Awareness Training - Internal	Apr-24	Tara Nutbeam-King Corporate Fraud	
	Review Internal Colleague Resources - And provide circular updates - reminders on types of fraud	Start Q1 24/25 (four month intervals)	Tara Nutbeam-King Corporate Fraud	Intel Officer
	Internal Fraud Awareness Communications Strategy - Re circulate Policy and Strategy	Start Q1 24/25 (four month intervals)	Tara Nutbeam-King Corporate Fraud	Intel Officer
	SCDC One Team - shadowing with colleagues			
	Develop Fraud Risk Attitude Survey	Circulate Q1 24/25	Tara Nutbeam-King Corporate Fraud	Tara Nutbeam-King
	Review feedback from Survey and report to LT	Jul-24	Tara Nutbeam-King Corporate Fraud	
	Investigate reported fraud and administer sanctions and redress	Civil council tax fines based on intelligence from CCCFI project.	Jul -24	Tara Nutbeam-King Corporate Fraud
Deliver Value for Money	Review team structure and JE's	TBC	Tara Nutbeam-King Corporate Fraud	Tara Nutbeam-King
	Implement new Case Management System - enhanced reporting and intelligence building efficiency	January 24 - July 24	Tara Nutbeam-King Corporate Fraud	Tara Nutbeam-King
	Project - Offering Chargeable Services	24-25	Tara Nutbeam-King Corporate Fraud	Evie Sorakiate
Provide assurance to the public that we are serious about protecting the integrity of the services and remain vigilant against fraud (Public Sector).	Publicise sanctions and redress inc. Civil SPD fine.		Tara Nutbeam-King Corporate Fraud	Tara Nutbeam-King
	Fraud Awareness Public Campaign - Rising 18's discount	24-25	Tara Nutbeam-King Corporate Fraud	Tara Nutbeam-King



## Definitions

Bribery	Offering, promising or giving a financial or other advantage to induce or reward improper performance or the request or receipt of such an advantage. It includes the corporate offence of failing to prevent bribery.
Corruption	Is the abuse of entrusted power for private benefit that usually breaches, regulations, standards or integrity and/or standards of professional behaviour.
Error	In the context of this strategy this where the intent is not assessed to be fraudulent or cannot be proved to be fraudulent. It could be due to an organisation or third party decision or action. However, error also results in losses to public funds.
Fraud	Defined in the Fraud Act 2006(1). The Act gives a statutory definition of the criminal offence of fraud, defining it in three classes – fraud by false representation, fraud by failing to disclose information, and fraud by abuse of position.
Fraud Deterrence	The act of discouraging fraud by being clear of the consequences. Sending out the message that committing fraud has adverse consequences for fraudsters, victims and society.
Fraud Prevention	To stop the likelihood and reduce the impact of fraud. To create an anti-fraud culture in which people and processes work together to minimise fraud risk.
Fraud Risk Assessment	Is a process aimed at proactively identifying and addressing an organisation's vulnerabilities to both internal and external fraud. It is an essential element of effective counter fraud response and whilst it should be integrated into the organisation's overall risk management approach, it requires specific skills, knowledge, processes and products.
Risk	The possibility of an adverse event occurring or a beneficial opportunity being missed. If realised, it may have an effect on the achievement of objectives and can be measured in terms of likelihood and impact.
Inherent Risk	Also defined as gross risk, is the risk to an organisation assuming there are no controls in place.
Residual Risk	Also defined as net risk, or fraud risk exposure, it is the risk remaining once the risk response has been successfully applied.



Risk Appetite	The amount of risk the organisation is willing to accept at the enterprise level, which manifests itself in the type and number of activities and associated risk that the organisation is willing to undertake.
Risk Tolerance	The threshold levels of risk exposure and target levels of incidences and losses that, with appropriate approvals, can be exceeded; but which, when exceeded, will trigger some form of response – for example, reporting the situation to senior management.
Threat	A person or group, object or activity that has the potential to cause harm to the achievement of the organisation's objectives. It takes into account capability and intent to do so.
Artificial Intelligence	The theory and development of computer systems able to perform tasks normally requiring human intelligence, such as visual perception, speech recognition, decision-making, and translation between languages. (Oxford Reference, n.d.)

## Annexe A.

### Nolan Principles of Public Life (Life, 1995)

- Selflessness - Act solely in terms of the public interest.
- Integrity - Avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.
- Objectivity - Act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- Accountability – Be accountable for their decisions and activities and must submit themselves to the scrutiny necessary to ensure this.
- Openness - Act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
- Honesty - Be truthful.
- Leadership - Holders of public office should exhibit these principles in their own behavior. They should actively promote and robustly support the principles and be willing to challenge poor behavior wherever it occurs.

