

Item: 16

Title: Reviewed and revised Llais counter fraud policy and Standards of Business Conduct policy

Gweithredu / Action required	For consideration and approval
Amseru / Timing	Routine
Argymhelliad / Recommendation	The Board is asked to approve the reviewed and updated Counter Fraud policy and the Llais Standards of Business Conduct policy following consideration and endorsement by the Audit and Risk Assurance Committee at its meeting on the 23 September 2026.
Risg / Risk	Failure to maintain up to date policies could result in Llais operating with outdated arrangements. This could weaken organisational controls, reduce compliance with Welsh Government expectations, limit staff awareness, and diminish assurance to the Accounting Officer, Audit and Risk Assurance Committee and Board regarding the effectiveness of organisational arrangements. This could also lead to financial loss, reputational damage and reduced confidence in Llais's organisational stewardship and management of public funds. These policies are important components of the overall governance, risk management and assurance framework for Llais and help maintain public confidence in Llais's stewardship of public resources.
Cyllid / Finance	There are no additional financial implications arising directly from the policy updates.
Amcan y Cynllun Strategol / Cynllun Blynyddol / Strategic Plan / Annual Plan Objective	This reviewed and revised policies relate to the Annual Plan priority area 5 to grow, develop and improve as an organisation.

Ecwiti, Amrywiaeth a Chynhwysiant / Equity, Diversity & Inclusion	There are no direct equity, diversity or inclusion implications arising from the policy revisions. The policies apply equally to all employees, Board Members, volunteers and others acting on behalf of Llais and supports fair, transparent and consistent approaches.
Cyfathrebu / Communications	Please tick one of the following boxes if this activity will have an impact on: Internal: our people ☒ External: our customers/partners/stakeholders ☒ External: our organisation's reputation ☒
Cymeradwyaeth / Approval/Clearance	Chief Executive
Trafodaethau/ Penderfyniadau Blaenorol / Previous discussions/decisions	The Board approved a Counter Fraud Policy in February 2023 in advance of Llais becoming operational. The original Standards of Business Conduct policy was approved by the Board on 27 February 2023, and both were ratified in April 2023 once Llais was fully operational.
Awdur/ Cyflwyno / Author/presenting	Richard Bevan, Corporate Director of Governance and Board Secretary.
Dyddiad / Date	7 October 2026
Cefndir / Background - Manylion / Detail	
Reviewed Counter Fraud Policy: The existing counter fraud policy was approved by the Board in February 2023. A scheduled review has been undertaken to ensure the policy remains current, reflects legislative and best practice requirements, and aligns with Welsh Government counter fraud expectations and standards. The revised policy has also been reviewed by the NHS Shared Services counter fraud service to make sure that the arrangements remain proportionate and appropriate for Llais. The revised policy continues to support the organisation's governance framework and provides updated arrangements to prevent, detect and respond to fraud, bribery and corruption. It reinforces Llais's commitment to stewardship of public funds and supports compliance with Welsh Government counter fraud expectations. It seeks to promote a fraud aware culture throughout Llais. As a result, it is also linked to several other policies in Llais. One of these is the Standards of Business Conduct policy.	

The review has confirmed that the policy remains aligned with the Welsh Government Counter Fraud Standards and the arrangements provided through the NHS Wales Counter Fraud Service.

The revised policy does not change Llais's fundamental zero-tolerance approach to fraud, bribery and corruption, but seeks to strengthen and clarify several areas, including:

- Enhanced emphasis on organisational fraud risk assessment and proposed integration with the corporate risk management framework. A fraud risk profile has been developed, which has been considered by the Audit and Risk Assurance Committee and integrated into the organisation's network of risk registers. Advice in this work has been received from NHS Shared Services Counter Fraud Service.
- Clearer accountability and awareness arrangements for the Chief Executive as Accounting Officer, managers, staff and the lead role for the Corporate Director of Governance and Board Secretary in relation to counter fraud have been added. A counter fraud operational plan was recently agreed by Executive Team, and this provides the framework for that activity.
- Strengthened arrangements for counter fraud awareness, learning and reporting have been highlighted. A counter fraud survey is to be undertaken and further awareness raising session is to be provided across Llais, in advance of the Counter Fraud Specialist making an annual report to the March meeting of the Audit and Risk Assurance Committee.
- Clarity has been added regarding the role of the Local Counter Fraud Service and annual planning, assurance and reporting arrangements.

The Executive Team has considered the review supported the update. The changes resulting from the review have been summarised above and have been endorsed by the Audit and Risk Assurance Committee. The committee received the fully reviewed and revised tracked changes version of the policy and endorsed the amendments.

Reviewed Standards of Business Conduct policy: A Standards of Behaviour Policy was approved by the Board in February 2023 and ratified in April 2023, when Llais became fully operational. The existing policy has subsequently been reviewed to ensure it remains current, reflects developing organisational arrangements and incorporates learning identified through governance and audit processes. The policy

also aligns with Welsh Government expectations regarding standards of conduct, good governance, openness and accountability within public bodies.

The review also provided an opportunity to strengthen links with Llais's behaviour framework and wider governance arrangements and as a result the name of the policy was reworded to avoid confusion with Llais's behaviours framework.

The policy establishes the standards of business conduct expected of staff, volunteers and non-executive members and sets out the arrangements for managing declarations of interests, gifts, hospitality, honoraria and sponsorship. It is founded on the Seven Principles of Public Life (the Nolan Principles) and citizen-centred governance principles applicable to public bodies in Wales. It also links to the organisation's work on developing a counter fraud aware culture.

The review resulted in a revised and consolidated policy which links to other policies in Llais's framework of policies.

The areas of change are as follows:

- Clarifying individual and leadership responsibilities relating to standards of business conduct, declarations of interest and associated processes to reflect recent organisational leadership and structure changes.
- Strengthened arrangements for maintaining and reporting registers of interests and gifts, hospitality, honoraria and sponsorship. A range of work has been undertaken on these over recent years and recently through the Corporate Services Group and also the review of Llais Standing Orders. There is now comprehensive coverage across regions, national services and the Board. The routine reporting to the Audit and Risk Assurance Committee will continue as usual with the proposal that the Board declarations of interest log will formally be reviewed twice a year by the Audit and Risk Assurance Committee and then by the Board.
- Updated guidance relating to gifts, hospitality, sponsorship and honoraria.
- Enhanced understanding and awareness relating to procurement activity, secondary employment, personal relationships and potential conflicts of interest.
- Reinforced expectations relating to transparency, accountability and compliance with relevant legislation and public sector governance standards.

- Strengthened links between standards of business conduct, counter fraud arrangements, speaking up processes and the organisation's overall governance framework.

Compliance with the policy will continue to be monitored through the maintenance and periodic review of registers of interests and gifts, hospitality, honoraria and sponsorship. Assurance will be provided through regular reporting to the Audit and Risk Assurance Committee as part of the organisation's wider governance and counter fraud arrangements.

The Corporate Services Group and the Executive Team have reviewed the policy and recommended its onward submission to the Audit and Risk Assurance Committee. The Committee received the full tracked changes version of the policy and endorsed the changes and recommended its approval by the Board.

Next Steps: Following approval, the reviewed policies will be formally launched in the organisation, will be available via our intranet/SharePoint and awareness raising as outlined above will be undertaken. Easy read versions will also be developed and where possible infographics will be used to raise awareness of the key messages

The Audit and Risk Assurance Committee endorsed the approval of the updated policies recognising that these were updates of existing policies and with the proviso that further work was being undertaken in the coming year to fully rework the policies and where possible simplify the formats.

Argymhelliad / Recommendation

The Board is asked following endorsement by the Audit and Risk Assurance Committee to:

- Approve the changes to the revised Counter Fraud Policy.
- Approve the changes to the Standards of Business Conduct Policy.