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<b>Report To:</b>	<b>Policy &amp; Resources Committee</b>	<b>Date:</b>	<b>21 March 2023</b>
<b>Report By:</b>	<b>Head of Legal &amp; Democratic Services</b>	<b>Report No:</b>	<b>LS/028/23</b>
<b>Contact Officer:</b>	<b>Emma Peacock</b>	<b>Contact No:</b>	<b>01475 712710</b>
<b>Subject:</b>	<b>Inverclyde Council Criminal Finances Act 2017 Policy – Remit from Audit Committee</b>		

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## **1.0 PURPOSE AND SUMMARY**

1.1  For Decision  For Information/Noting

1.2 The purpose of this report is to request the Committee to consider a remit from the Audit Committee regarding the Inverclyde Council Criminal Finances Act 2017 Policy.

1.3 The Audit Committee meeting held on 21 February 2023, after consideration of a report by the Head of Legal and Democratic Services on the Inverclyde Council Criminal Finances Act 2017 Policy, agreed to:

- (i) Note the requirement for the Council to have in place adequate prevention procedures in relation to tax evasion offences in terms of the Criminal Finances Act 2017, and
- (ii) remit the proposed Criminal Finances Act 2017 policy to the Policy & Resources Committee for its subsequent approval and implementation.

1.4 The Criminal Finances Act 2017 (“the CFA”) came into force on 30 September 2017 and amended the Proceeds of Crime Act 2002. The CFA creates a corporate offence whereby a corporate body, or a person associated with a corporate body, facilitates the commission of a tax evasion offence.

1.5 In terms of the CFA, it will be a defence for the corporate body to prove that, where the tax evasion facilitation offence was committed, the corporate body had in place reasonable prevention procedures, or where the corporate body can prove that it was not reasonable in the circumstances for the said body to have any prevention procedures in place.

1.6 The development and agreement of a suitable policy on behalf of the Council, will help ensure that the Council takes the appropriate prevention procedures in relation to the facilitation of tax evasion in terms of the CFA. A copy of Inverclyde Council’s proposed CFA policy is attached as Appendix 1. This purpose of this report is to request the Committee to approve the proposed CFA policy which will then be implemented by officers.

## **2.0 RECOMMENDATIONS**

It is recommended that the Committee:

- 2.1 Note the requirement for the Council to have in place adequate prevention procedures in relation to tax evasion offences in terms of the Criminal Finances Act 2017, with the Committee being asked to approve the proposed Criminal Finances Act 2017 policy attached as Appendix 1, and to then remit it to the Head of Legal and Democratic Services and the Chief Financial Officer to take all necessary action to implement the same.

**Iain Strachan**  
**Head of Legal & Democratic Services**

### 3.0 BACKGROUND AND CONTEXT

- 3.1 The CFA provides that a corporate body, such as the Council, is guilty of an offence if a person associated with the Council commits a tax evasion facilitation offence when acting in the capacity of a person associated with the Council. A person acts in the capacity of a person associated with the Council if that person is:
- An employee of the Council, or acting in the capacity of an employee of the Council;
  - An agent of the Council acting in the capacity of an agent of the Council; or
  - Any other person performing services for or on behalf of the Council acting in the capacity of a person performing such services.
- 3.2 The offence created by the CFA relates to both UK tax evasion and foreign tax evasion.
- 3.3 UK tax evasion facilitation means:
- being knowingly concerned in, or in taking steps with a view to, the fraudulent evasion of tax by another person,
  - aiding, abetting, counselling or procuring the commission of a UK tax evasion offence, or
  - being involved in and part in the commission of an offence consisting of being knowingly concerned in, or in taking steps with a view to, the fraudulent evasion of a tax.
- 3.4 Foreign tax evasion facilitation means conduct which:
- amounts to an offence under the law of a foreign country,
  - relates to the commission by another person of a foreign tax evasion offence under that law, and
  - would, if the foreign tax evasion offence were a UK tax evasion offence, amount to a UK tax evasion facilitation offence.
- 3.5 The Council could face an unlimited fine along with significant reputational damage were it to be found guilty of the offence of tax evasion facilitation.
- 3.6 It would be a defence for the Council, were any associated persons to be found guilty of tax evasion facilitation, if the Council can prove that it had reasonable prevention procedures in place to prevent the criminal facilitation of tax evasion by an associated person. The UK Government has issued guidance to corporate bodies in relation to the prevention procedures. The Guidance states that prevention procedures put in place by relevant bodies to prevent tax evasion from being committed on their behalf should be informed by the following six principles:
- Risk assessment
  - Proportionality of risk-based prevention procedures
  - Top level commitment
  - Due diligence
  - Communication (including training)
  - Monitoring and review.
- Corporate offences for failing to prevent criminal facilitation of tax evasion - <https://www.gov.uk/government/publications/corporate-offences-for-failing-to-prevent-criminal-facilitation-of-tax-evasion>
- 3.7 The development of a CFA policy by the Council will facilitate the compliance of the Council, and its associated persons, with the requirements of the CFA. It will also support the Council's implementation of appropriate prevention procedures. A draft policy would have been brought forward by officers before now, but this was delayed pending a review as to how other authorities were approaching the CFA, coupled with the impact of the covid pandemic and the retirement of the former Head of Legal & Property Services.

3.8 The following list contains some examples of potential red flag areas which may arise during the course of Council work and which may raise concerns in relation to tax evasion. The list is non exhaustive and is for illustrative purposes only:

- Council officers become aware, in the course of their work, that a third party has made or intends to make a false statement relating to tax, has failed to disclose income to HMRC, or has deliberately failed to register for VAT (or failed to account for VAT);
- A third party requests payment in cash and/or refuses to provide an invoice or receipt for a payment made;
- A Council officer becomes aware, in the course of their work, that a third party working for the Council as an employee asks to be treated as a self-employed contractor, but without any material changes to their working conditions; or
- A third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business; or a Council officer becomes aware that the Council has been invoiced for fee payment that appears too large or too small, given the service stated to have been provided.

Audit Scotland have published some guidance on potential risk areas which can be accessed via the following links:

[https://www.audit-scotland.gov.uk/uploads/docs/um/fraud\\_red\\_flags\\_procurement.pdf](https://www.audit-scotland.gov.uk/uploads/docs/um/fraud_red_flags_procurement.pdf)

[https://www.audit-scotland.gov.uk/uploads/docs/report/2020/briefing\\_200723\\_covid.pdf](https://www.audit-scotland.gov.uk/uploads/docs/report/2020/briefing_200723_covid.pdf)

#### 4.0 PROPOSALS

4.1 The Committee is asked to approve the proposed CFA policy and to then remit it to the Head of Legal and Democratic Services and the Chief Financial Officer to take all necessary steps to implement the policy. The CFA policy sets out the definition of the facilitation of tax evasion; the various prevention procedures the Council may undertake; the obligations of the Council and its associated persons in terms of the CFA and potential risk scenarios. The policy will also apply to Council staff working for the Inverclyde Health & Social Care Partnership.

4.2 It is to be noted that whilst the adoption of the policy will not, of itself, require any notable resources, there will be a need for more detailed cross-service work to carry out the necessary risk assessments, subsequent policy/procedure updating and associated staff training. It is, however, considered that this work is required, given the CFA. Where required, further consultation with the Trades Unions may also be needed.

#### 5.0 IMPLICATIONS

5.1 The table below shows whether risks and implications apply if the recommendation(s) is(are) agreed:

SUBJECT	YES	NO	N/A
Financial		X	
Legal/Risk	X		
Human Resources	X		
Strategic (LOIP/Corporate Plan)			X
Equalities & Fairer Scotland Duty		X	
Children & Young People's Rights & Wellbeing			X
Environmental & Sustainability			X

Data Protection			X
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## 5.2 Finance

As noted above, whilst the adoption of the policy will not, of itself, require any notable resources, there will be a need for more detailed cross-service work to carry out the necessary risk assessments, subsequent policy/procedure updating and associated staff training. As matters stand, it is envisaged that all this would, however, be contained within existing resources. The policy would also assist in mitigating the risk of the Council facilitating tax evasion, or being said to do so.

### One off Costs

Cost Centre	Budget Heading	Budget Years	Proposed Spend this Report	Virement From	Other Comments
N/A					

### Annually Recurring Costs/ (Savings)

Cost Centre	Budget Heading	With Effect from	Annual Net Impact	Virement From (If Applicable)	Other Comments
N/A					

## 5.3 Legal/Risk

The adoption of a CFA policy will assist the Council to ensure compliance with its duties in terms of the CFA and mitigate the risk of the Council, or its associated persons, being found guilty of tax evasion facilitation.

## 5.4 Human Resources

There are Human Resources implications if the Council decides to adopt the CFA policy, in particular the requirement for staff to undertake training in relation to preventing the facilitation of tax evasion and the requirement for all Council employees to comply with the policy. There would also be a need for relevant staff to be involved in the risk assessment that would be needed, together with any updating of policies and procedures. Where required, further consultation with the Trades Unions may also be needed.

## 5.5 Strategic

N/A

## 5.6 Data Protection

### (a) Equalities

This report has been considered under the Corporate Equalities Impact Assessment (EqIA) process with the following outcome:

X	YES – Assessed as relevant and an EqIA has been carried out and can be accessed via the following link <a href="https://www.inverclyde.gov.uk/council-and-government/equality-impact-assessments/equality-impact-assessments-2023">https://www.inverclyde.gov.uk/council-and-government/equality-impact-assessments/equality-impact-assessments-2023</a>
	NO

(b) Fairer Scotland Duty

If this report affects or proposes any major strategic decision:-

Has there been active consideration of how this report’s recommendations reduce inequalities of outcome?

	YES – A written statement showing how this report’s recommendations reduce inequalities of outcome caused by socio-economic disadvantage has been completed.
X	NO – Assessed as not relevant under the Fairer Scotland Duty.

**6.0 CONSULTATION**

6.1 The Interim Director of Finance & Corporate Governance, Corporate Procurement Manager, Head of OD, HR and Communications and Chief Internal Auditor have all been consulted on this report.

**7.0 BACKGROUND PAPERS**

7.1 N/A

OFFICIAL

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# ***Criminal Finances Act 2017 Policy***

*Produced by:  
Legal & Democratic Services*

January 2023



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## DOCUMENT CONTROL

Document Responsibility		
Name	Title	Service
Head of Legal & Democratic Services	Criminal Finances Act 2017 Policy	Legal & Democratic Services

Change History		
Version	Date	Comments
0.1	4/11/2022	
0.2	19/01/23	

Distribution		
Name/ Title	Date	Comments
	-	-
Corporate Management Team	18 January 2023	Approved with comments
Audit Committee	21 February 2023	-

*Distribution may be made to others on request*

Policy Review		
Review Date	Person Responsible	Service
This policy will be the subject of review no less than three years after it has come into force.	Head of Legal & Democratic Services	Legal & Democratic Services

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## Criminal Finances Act 2017 Policy

### 1. Policy Statement

1.1 The Council is committed to ensuring probity in its commercial dealings and requires the same from its employees, agents, advisers and any supplier, provider or other party with which it engages or transacts.

1.2 The purpose of this Policy is to put measures in place to ensure that the Council and any associate person complies with the requirements of the Criminal Finances Act 2017. As awareness and practice matures, further iterations of this Policy will be submitted to Committee for approval.

1.3 There are eight main types of taxes in the UK which are:

- Income tax;
- National Insurance Contributions;
- Value Added Tax (VAT);
- Corporation Tax;
- Excise Duty;
- Stamp Duty;
- Council Tax;
- Business Rates

1.4 The Council has a zero tolerance approach to all forms of tax evasion, whether under UK law or under the law of any foreign country. Employees of the Council (including the Inverclyde Health & Social Care Partnership (IHSCP)), its agents and contractor associates must not undertake any transactions which cause the Council to commit a tax evasion offence or facilitate a tax evasion offence by a third party.

1.5 At all times, Council business should be conducted in a manner such that the opportunity for, and incidence of, tax evasion is prevented.

### 2. Background

2.1 The Criminal Finances Act 2017 (“the CFA”) came into force on 30<sup>th</sup> September 2017. The CFA amends the Proceeds of Crime Act 2002 and includes provision to create corporate offences for cases where a person associated with a body corporate or partnership facilitates the commission by another person of a tax evasion offence and for connected purposes.

### 3. Purpose & Scope

3.1 Local Government has not been identified as a high risk sector by His Majesty's Revenue & Customs (HMRC). However, the broad nature of Council activities combined with its diverse locations and workforce, may bring the Council, its Officers, Elected Members and associates into contact with other parties who may contemplate conduct which constitutes an offence under the CFA. Offences under the CFA are not about the Council itself avoiding, evading or underpaying tax, but about it facilitating, or failing to prevent an associated person from facilitating the evasion of tax by a third party.

3.2 Under the CFA, an associated person is a person (including a corporate body) who is:

- a) an employee of the Council who is acting in the capacity of an employee;
- b) an agent of the Council who is acting in the capacity of an agent; or
- c) any other person who performs services for or on behalf of the Council who is acting in the capacity of a person performing such services.

3.3 For the Council this would include employees, contractors and other organisations performing services for the Council.

3.4 The CFA provides that whether a person is an associated person will be determined by reference to all relevant circumstances.

3.5 Offences under the CFA will be committed where the Council fails to prevent an associated person criminally facilitating the evasion of a tax, and this will be the case whether the tax evaded is owed in the UK or in a foreign country. The CFA aims to overcome the difficulties in attributing criminal liability to 'relevant bodies' for the criminal acts of employees, agents or those that provide services for or on behalf of a relevant body.

3.6 There are a number of duties required by the Council as the body corporate, but equally of its Officers, Elected Members and those associated with the Council. The development and agreement of a suitable policy represents the Council's initial endeavours and commitment to discharge these requirements.

#### **4. What is the facilitation of tax evasion?**

4.1 Tax evasion means the offence of cheating the public revenue or fraudulently evading UK tax. This is a criminal offence. The offence requires an element of fraud which means that there must be deliberate action or omission with dishonest intent.

4.2 Foreign tax evasion is the evasion of tax in a foreign country, provided that conduct is an offence in that country and would be a criminal offence if committed in the UK. An element of fraud is required as stated above.

- 4.3 Tax evasion facilitation means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax by another person, or aiding abetting, counselling or procuring the commission of that offence. Tax evasion facilitation is a criminal offence where carried out deliberately and dishonestly.

## 5. What persons associated with the Council must not do

5.1. Persons associated with the Council, as referred to above, must not:

- engage in any form of tax evasion;
- aid, abet, counsel or procure the commission of a tax evasion offence or foreign tax evasion offence by another person;
- fail to promptly report (i) any request or demand from any third party to facilitate the fraudulent evasion of tax or (ii) any suspected fraudulent evasion of tax by another person in accordance with this policy;
- engage in any other activity that might lead to a breach of this policy; or
- threaten or retaliate against another individual who has refused to commit or to facilitate a tax evasion offence or who has raised concerns under this policy.

## 6. Prevention Procedures

6.1 In order to safeguard the Council and those associated with it, there are a number of prevention procedures which require to be put in place to prevent tax evasion from being committed or facilitated. These procedures are guided by the following six principles which are not prescriptive, but are designed to be flexible and outcome focused given the variety of circumstances that they are intended to cover. This Policy, which is intended to discharge the requirements of the CFA is based around these principles:

- Risk assessment;
- Proportionality of risk-based prevention procedures;
- Top level commitment;
- Due diligence;
- Communication and training; and
- Monitoring and review.

### 6.2 Risk Assessment

The Council will assess the nature and extent of its exposure in relation to the CFA including the risk relating to those who act in the capacity of a person associated with the Council and the potential for them criminally facilitating tax evasion offences. An initial risk assessment questionnaire will be issued to all Council Services, the Inverclyde Health and Social Care Partnership, Inverclyde Leisure

and Riverside Inverclyde. The questionnaire will prompt reflection and consideration of the types of services provided, along with processes and procedures. It is intended that this will identify areas of potential risk or vulnerability in terms of the CFA.

The responses to the questionnaire will be used to assess risk and create an initial CFA risk register. This, in turn, will prioritise further workstreams to manage and mitigate these risks and refine the CFA risk register. This will be kept under review in accordance with the Council's established governance arrangements in relation to risk assessments and will feed into Service Area, Directorate and the Corporate Risk Register(s).

### **6.3 Proportionality of Risk-based Prevention Procedures**

The Council has a suite of existing procedures to prevent fraud, irregularity and criminality. The existing Policy base is reasonable and proportionate however consideration is being given to the requirements of the CFA on their scope and application and includes:

- Procurement Policy;
- Whistleblowing, Anti- Fraud and Corruption, Anti-Bribery and Money Laundering Policies;
- Policies dealing with the reimbursement of expenses;
- Financial Regulations;
- Annual Related Party Transaction;
- IR35 Monitoring in relation to the off-payroll working rules;
- Employee Code of Conduct; and
- Officer Gifts and Hospitality and Conflict of Interest reporting requirements.

This work will be included as part of the ongoing review of the Council's policy base and specified to prevent persons acting in the capacity of a person associated with the Council from criminally facilitating tax evasion. The risk assessment will consider factors such as opportunity, motive and means, with it:

- Being proportionate to the risk the Council faces;
- Considering the nature, scale and complexity of the Council's activities;
- Recognising the reasonableness of existing prevention procedures; and
- Recognising that this work will not require the Council to undertake excessively burdensome procedures in order to eradicate all risk.

### **6.4 Top Level Commitment**

There is a requirement for Senior Officers and Elected Members to be committed to the implementation of the CFA. This commitment will initially be demonstrated through the provision of training, with the aim of raising awareness of behaviours or arrangements which may constitute tax irregularity, increasing confidence and skills to challenge such behaviours or proposals and in doing so, further fostering a culture within the Council where fraud, irregularity and evasion is never acceptable and risks are minimised.

### **6.5 Due Diligence**

The Council will continue to apply suitable due diligence procedures, taking an appropriate and risk based approach. Additional focus will be given to persons who perform or will perform services on behalf of the Council, in order to mitigate identified risks. In addition, where the service questionnaire referenced above identifies areas of potential vulnerability then processes, procedures, guidance and skills will be reviewed and bolstered to support compliance.

### **6.6 Communication & Training**

The Council will ensure that this, and associated Policies and procedures are communicated, embedded and understood. The development and agreement of this Policy, will be embedded through internal and (where relevant) external communication, including training. This will include more detailed training in higher risk areas or where officers are best placed to identify potentially criminal acts or behaviours e.g. Legal and Democratic Services, Finance, Property, Procurement and so on. This is proportionate to the risk to which the organisation assesses that it is exposed to and where risk is most likely to manifest.

### **6.7 Monitoring & Review**

The Council will monitor and review its preventative procedures, along with this Policy, and make improvements where necessary. It is anticipated that the nature of the risks faced by the organisation will change and evolve over time. This may be as a natural result of external developments, changes to other seemingly unrelated policies and procedures, implementation of new legislation or service demands. This will require the Council to review, and update, its procedures in response to the changes in the risks that it faces.

## **7. Penalties Under the Act**

7.1 Where the Council, Elected Members, Officers or associates are successfully prosecuted under the Act the sanctions may lead to:

- An unlimited fine;
- A public record of conviction; and
- Significant reputational damage and adverse publicity.

7.2 The purpose of this Policy, its further development and other steps identified, is to protect the Council both from a reputational and financial perspective.

## **8. Obligations of Employees & Other Associated persons**

8.1 Should employees or other associated persons become concerned that a fellow employee or associate is, or might be, facilitating a third party's tax evasion, they should immediately contact either:

For concerns relating to the Council either

- the Chief Financial Officer (Section 95 Officer); or
- the Head of Legal & Democratic Services (Monitoring Officer); or

For concerns relating to the IHSCP either

- the Head of Finance, Planning & Resources for the IHSCP; or
- the Head of Legal & Democratic Services (Monitoring Officer).

8.2 Employees should not proceed with any business or transactions that they know or suspect to be related to tax evasion but should immediately seek advice from the above Officers. In addition, the above Officers should be contacted if an employee knows or suspects that a third party is in some way utilising or planning to utilise the Council to facilitate tax evasion. An employee who raises concerns with the above Officers may be asked to complete the form set out in the Appendix to this Policy.

8.3 Guidance will be provided to Services to ensure that the Council's advisers, contractors and other Associated Persons are aware of their obligations under the CFA. Where applicable and proportionate, this will be reinforced with appropriate terms and conditions in new contracts, award letters and other contractual agreements going forward.

8.4 As noted above, the Council has a number of processes and policies, which will ensure that steps are taken to prevent the facilitation of tax evasion by its employees and associates. These cover the following subjects:

- Procurement Policy, including tender documentation and contracts awarded as a consequence;
- Other contractual and other agreements (including funding agreements, grant awards etc);
- Whistleblowing, Anti- Fraud and Corruption, Anti-Bribery, and Anti-Money Laundering Policies;
- Reimbursement of Expenses or outlays;
- Financial Regulations;
- Annual Related Party Transaction;
- IR35 Monitoring in relation to the off-payroll working rules;
- Employee Code of Conduct; and

- Purchase Orders and associated payment arrangements.

8.5 The Council is also an active participant in the National Fraud Initiative and has an internal audit function to provide ongoing assurance over the Council's financial and non-financial systems.

8.6 In addition to the above, and recognising that tax evasion is a criminal offence, any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

## **9. Responsible Officer**

9.1 The Council has nominated the Chief Financial Officer as the key officer responsible for the CFA within the organisation.

9.2 The Council has also nominated the Head of Legal & Democratic Services as the officer responsible for information, training and general queries on the CFA, who is known as the 'point person'

**APPENDIX  
TEMPLATE TAX EVASION REPORT FORM**

**CONFIDENTIAL**

**TAX EVASION REPORT FORM**

Please complete all relevant boxes.

Give as much detail as possible, a full report is crucial to ensuring a proper investigation into the matter disclosed is undertaken. Include details such as:-

- When/where any transactions took place
- The exact nature of the transaction, if possible provide documentary evidence
- Whether the suspected activity has happened, is ongoing or is imminent
- Why you believe the activity to be suspicion

Please DO NOT DISCLOSE the matter to anyone other than the Chief Financial Officer, the Head of Finance, Planning & Resources for the Inverclyde Health & Social Care Partnership, or the Head of Legal and Democratic Services. There is a section in this form to be filled out if anyone other than the Chief Financial Officer, the Head of Finance, Planning & Resources for the Inverclyde Health & Social Care Partners or the Head of Legal and Democratic Services has been informed, but you must give good reason as to why such a disclosure was made.

Once the form has been completed please email it to the following:

For concerns relating to the Council either

- The Chief Financial Officer ([Alan.Puckrin@inverclyde.gov.uk](mailto:Alan.Puckrin@inverclyde.gov.uk)), or
- the Head of Legal and Democratic Services ([Iain.Strachan@inverclyde.gov.uk](mailto:Iain.Strachan@inverclyde.gov.uk))

For concerns relating to the Inverclyde Health & Social Care Partnership either

- the Head of Finance, Planning & Resources for the Inverclyde Health & Social Care Partnership ([Craig.Given@inverclyde.gov.uk](mailto:Craig.Given@inverclyde.gov.uk)), or
- the Head of Legal and Democratic Services ([Iain.Strachan@inverclyde.gov.uk](mailto:Iain.Strachan@inverclyde.gov.uk))



**DISCLOSURE UNDER CRIMINAL FINANCES ACT POLICY**

<b>ABOUT YOU</b>				
Name				
Department				
Contact Number				
Contact Email				
<b>ABOUT YOUR CONCERN</b>				
Nature of Suspicious Activity				
Name, address and any contact details of person(s) you think may be involved. If a company or other body please include details of nature of business				
Nature/Value and timing of activity or transaction involved (e.g. cash)				
Please give any other information you think is relevant				
Have you informed anybody of your suspicions already?		Yes	See below	No
If "yes" please give name and contact details of person.				
If "yes" please say why you felt a disclosure was necessary.				
Do you have a good reason for this matter not to be disclosed to HMRC (e.g. you are a lawyer and wish to claim legal professional privilege)		Yes	See below	No
If "yes" please give details.				

Signed:

Name:

Date: