

ANTI-FRAUD AND CORRUPTION POLICY

Introduction

- 1.1 The Sussex Police Authority is committed to discharging its responsibility to safeguard public funds and the highest standards of integrity. It is committed to fighting fraud and corruption whether attempted from inside or outside. The Police Authority is committed to having effective measures to prevent and detect fraud and corruption.
- 1.2 The Police Authority expects all members, employees and appointees to carry out their duties in accordance with appropriate legal requirements, internal codes of practice, rules and regulations and to act at all times with honesty and probity in the discharge of their functions.
- 1.3 In carrying out its duties and responsibilities, the Police Authority is determined to do everything it reasonably can to protect itself from fraud and corruption and is committed to the rigorous maintenance of this Anti- Fraud and Corruption Policy which will provide a framework for:
 - encouraging fraud deterrence and prevention;
 - raising awareness of fraud and corruption and promoting their detection;
 - performing investigations and facilitating recovery of losses;
 - invoking disciplinary proceeding and referrals to the Police; and
 - monitoring, publishing and updating the Policy and its related procedures and performance.
- 1.4 The Police Authority also expects that all outside individuals and organisations, including suppliers, contracting partners and claimants will act towards it with honesty and integrity without thought or actions involving fraud and corruption.
- 1.5 This Policy is part of the Police Authority's policies on good governance which includes the Confidential Reporting Policy.

Definitions

- 2.1 **Fraud** is 'the intentional distortion of the financial statements or other records by persons internal or external to the organisation which is carried out to conceal the misappropriation of assets or otherwise for gain.' This differs from 'theft' where no attempt at concealment is made. It is also important to distinguish this from negligence and accidental error where no intent exists. This may involve:
 - Falsification or alternation of accounting records or other documents

- Suppression or omission of the effects of transactions from records or documents
- Recording transactions which have no substance; or
- Wilful misrepresentation of transactions or of the Police Authority's state of affairs

2.2 **Corruption** is 'The offering, giving, soliciting or acceptance of an inducement or reward which may influence actions taken by the body, its members or officers.' Main areas of activity, which are susceptible to corruption may include:

- Building Contracts
- Asset Disposal
- Procurement

Operating Culture

- 3.1 The Police Authority is determined that the culture and tone of the organisation meets the expectations of the Committee on Standards of Public Life and is committed to the Nolan Principles of objectivity, openness, leadership, accountability, honesty, selflessness and integrity.
- 3.2 Employees are expected, and are positively encouraged to raise any concerns relating to fraud and corruption, of which they become aware. These can be raised in a number of ways including with the Chief Executive, Treasurer, Solicitor to the Authority or Deputy Chief Executive.
- 3.3 The Police Authority expects members, employees and appointees to lead by example in ensuring opposition to fraud and corruption, and in ensuring adherence to rules and regulations, and to National and Local codes of Conduct, and that all procedures and practices are beyond reproach. The responsibility of managers is to ensure that all employees are aware of what is expected of them.
- 3.4 The Police Authority requires all individuals and organisations with which it deals in any capacity to behave towards the Police Authority with integrity and without intent or actions involving fraud and corruption. The Corporate Governance Committee also monitor the Sussex Police Anti-Fraud and Corruption Policy and its implementation across the Force.
- 3.5 Police Authority employees, members and appointees are important elements in the stance against fraud and corruption and are positively encouraged to raise any concerns they may have on these issues which may impact on Police Authority activities using the Police Authority's Confidential Reporting Policy and Complaints Procedures.
- 3.6 As part of its responsibilities, Internal Audit investigate activities suspected of involving fraud and corruption, its audit plans are

required to provide adequate coverage of the risk of fraud and corruption and also to reflect the requirements for its staff to be properly and regularly trained.

Prevention

- 4.1 It is the responsibility of the Police Authority to put in place preventative measures to fight fraud and corruption to minimise risk.
- 4.2 The Police Authority's Standing Orders, Financial Regulations, and Scheme of Delegation to officers, together with the Codes of Conduct, set out a framework for dealing with the affairs of the Police Authority and all members and employees have a duty to comply with their provisions. This includes the duty of employees to act within statutory regulations.
- 4.3 Members must operate in accordance with the Police Authority's Standing Orders and National Code of Conduct.
- 4.4 The Police Authority has put in place systems and procedures to manage and discharge its functions in an efficient and effective way. These systems incorporate internal controls to prevent and deter fraud and corruption. Employees must ensure that working practices comply with the systems and Internal Audit Services will regularly evaluate the appropriateness and effectiveness.
- 4.5 The Police Authority maintains a number of safeguards at different levels to minimise the risks of identity theft, IT fraud and theft from electronic systems. External exposure to IT fraud and theft via electronic systems is prevented by the deployment of firewall technology and the use of encryption techniques.
- 4.6 Thorough documentation, including manuals and operating procedures, is expected of all financial and operational systems and they must be issued to relevant staff. These must be regularly reviewed to ensure that they are in line with best practice and effective internal controls.
- 4.7 Employee recruitment is required to be in accordance with procedures laid down by the Police Authority which includes equal opportunities Policies and the requirement of the Race Relations (Amendment Act 2000). In addition adequate checks, such as Criminal Record Bureau checks, are made appropriate to the posts and before any appointment is made.
- 4.8 Employees and members are required to disclose any offers of gifts, hospitality or interests that could conflict with the interests of the Police Authority or might affect their judgement. The Chief Executive will maintain a register to record and monitor disclosures.

Detection and Investigation

- 5.1 All employees and members are responsible for the prevention and detection of fraud, corruption and other irregularities. Managers should pay special attention to circumstances and processes where there is a greater opportunity for fraud and corruption
- 5.2 As set out in the confidential reporting policy, it is the responsibility of all employees, members and appointees immediately to inform the Chief Executive, Deputy Chief Executive, Treasurer, or Solicitor to the Authority if a fraud or other irregularity is suspected. They should inform the Head of Internal Audit who will ensure that:
 - any supporting documentation or other evidence is secured; and
 - confidentiality is maintained so as to not prejudice any subsequent investigation.
- 5.3 Concerns can be reported by employees and members via the fraud hotline, 01243 777629 or e-mail fraudhotline@westsussex.gov.uk The fraud hotline is operated by West Sussex County Council who provide the Treasurer and internal audit support to the Police Authority.
- 5.4 Reporting of suspected irregularities to the West Sussex County Council Head of Internal Audit will:
 - ensure the consistent treatment of information;
 - facilitates proper investigation, including compliance with statutory requirements and appropriate liaison at correct stages with Sussex Police; and
 - ensure the proper implementation of relevant system improvements.
- 5.5 The Police Authority will take appropriate action following an investigation which may include disciplinary action, civil recovery, or referral to Sussex Police.
- 5.6 The West Sussex County Council Internal Audit will assist the Police Authority to discharge its responsibilities for system control and when conducting audit reviews, they are alert to opportunities such as improvements in controls that could reduce the risk of fraud.
- 5.7 The Police Authority's internal audit arrangements include a number of pro-active fraud initiatives as part of their Annual Audit Plan. Investigations into suspected acts of fraud or corruption by Internal Audit will be undertaken professionally and sensitively by staff need to be trained. Internal Audit will follow procedures laid down to tackle Fraud and Corruption.

Training

- 6.1 Training and guidance is vital in maintaining the effectiveness of this Policy and its general credibility. The Police Authority supports

induction and work related training, particularly for employees involved in internal control systems, to ensure that their responsibilities and duties are regularly highlighted and reinforced and best practice in governance arrangements is followed by the Police Authority.

Review

- 7.1 The Police Authority will ensure that arrangements are in place to keep this Policy up-to-date with future developments in preventative, deterrent and detection techniques.
- 7.2 To this end Internal Audit will review annually the arrangements set out in this Policy as part of its consideration of the Statement on internal control

Reporting

- 7.3 The Chief Executive, as Monitoring Officer, will ensure that reports to the Authority and its committees and working groups on fraud and corruption are properly informed by professional legal advice, involving the Solicitor to the Authority as necessary.