

Anti-Fraud and Corruption Policy

Document Control

Responsible Dept	SCO Chief Executive	Author / Reviewer	SCO Chief Executive & Director of Finance
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Version Tracking Note: A maximum of the last 3 versions are to be tracked below.

Version No	Approval Date	Review Due Date	Approval Forum	Change(s) Summary
0.1	06.08.2025		SLT Monthly	First Draft – New SCO Policy.

Introduction

1. Fraud and corruption can have a severe impact on the operation, status and reputation of an organisation, particularly the Staffordshire Commissioners Office (SCO), Staffordshire Police (Force) and Staffordshire Fire & Rescue (FARS), and should be prevented at every opportunity. In administering its responsibilities in relation to fraud and corruption, whether it is attempted on the SCO or from within it, the SCO is committed to an effective fraud and corruption policy designed to:
 - Encourage prevention,
 - Promote detection,
 - Identify a clear pathway for investigation.

Aim

2. The aim of this policy is to clearly set out the anti-fraud and corruption procedure operated within the SCO and applies to the PFCC, DPFC and all staff employed by the SCO under the direction and control of the Chief Executive.
3. The SCO expects propriety and accountability at all levels and that staff will lead by example in ensuring adherence to policy and procedures ensuring practices are beyond reproach.
4. The SCO also expects that individuals and organisations connected to SCO business will act with integrity and without thought or actions involving fraud or corruption.

Definitions

5. For the purposes of this policy, fraud and corruption have been defined as follows:

Fraud: The intentional distortion of financial statements or other records by persons internal or external to the SCO, which is carried out to conceal the misappropriation of

assets or otherwise for gain. This may include but is not limited to, falsifying travel and subsistence claims, falsifying overtime or flexitime claims and obtaining employment through false qualifications.

Corruption: The offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person. This may include but is not limited to, hospitality, computer misuse, pecuniary interests and disposal of assets.

Anti-Fraud and Corruption Strategy

6. The SCO Anti-Fraud and Corruption Policy is based on a series of comprehensive and inter-related procedures that provide a framework to counter fraudulent activity. These include:
 - Culture
 - Prevention
 - Detection and investigation
 - Training
7. There is a high level of external scrutiny of SCO, Force & FARS affairs by a variety of bodies including:
 - His Majesty's Inspectorate of Constabularies and Fire & Rescue Services (HMICFRS),
 - HM Revenue and Customs,
 - External Audit,
 - Internal Audit,
 - Local Communities and Media,
8. Application of this policy applies to the PFCC, DPFCC and all those engaged in carrying out duties for and behalf of the SCO.

Culture

9. The SCO culture is driven by the 7 Principles of Public Life: The Nolan Principles, see Appendix 1, with complete opposition to fraud and corruption.
10. There is an expectation and requirement that all those engaged in carrying out duties for and behalf of the SCO will act with integrity and SCO staff at all levels will lead by example. Persons are actively encouraged to raise any concerns they may have as it is often the alertness of such individuals that enables detection to occur and the appropriate action to be taken against fraud and corruption. Concerns may be about something that:
 - Is unlawful,
 - Is against the SCO, Force, FARS policies or procedures,
 - Falls below established standards or practices,
 - Results in waste or loss to the SCO, Force or FARS,
 - Amounts to improper conduct.
11. The SCO Chief Executive (Monitoring Officer) is responsible for following up any allegation or suspicion of fraud or corruption received and will do so through clearly defined procedures. These procedures are designed to:
 - Deal promptly with the matter,

- Record all evidence received,
 - Ensure that evidence is sound and adequately supported,
 - Ensure security of all evidence collected,
 - Notify relevant bodies,
 - Implement disciplinary procedures where appropriate.
12. If necessary, a route other than a direct line manager may be used to raise such issues. Examples of such routes are:
- Director of Governance & Assurance (Deputy Monitoring Officer),
 - Director of Finance (S151 Officer),
 - Staff Associations.
13. For how to raise a concern and understand how they are dealt with, please read the Whistleblowing Policy.
14. There may be circumstances where a person may prefer to contact an external agency such as:
- Audit Commission Fraud Line
 - Internal Auditors
 - Crimestoppers
 - Staffordshire Police
15. If a person decides to take the matter outside of the organisation, they should ensure that they do not breach Data Protection Regulations and do not disclose 'Confidential' or 'Restricted' information.
16. The Public Interest Disclosure Act 1998 protects employees who report suspected fraud or corruption activities from any reprisals, as long as they meet the rules set out in the act. The rules for making a protected disclosure are:
- The information disclosed is made in good faith,
 - The person making the disclosure must believe it to be substantially true,
 - The person making the disclosure must not act maliciously or make false allegations,
 - The person making the allegation must not be seeking any personal gain.
17. Under the Act, the designated officer required to receive disclosures is the Chief Executive.
18. Members of the public are also encouraged to report concerns through any of the above avenues.
19. Allegations/concerns can be made anonymously, however, it should be noted that these cases can be more difficult to investigate. The likelihood of action being taken will depend on:
- The seriousness of the issues raised,
 - The credibility of the concern,
 - The likelihood of confirming the allegation from attributable sources.
20. The Senior Management Team are responsible for following up any allegation of fraud and corruption received, at the direction of the Chief Executive and will do so by:
- Dealing promptly with the matter,
 - Recording and securing all evidence received,

- Ensuring that evidence is sound and adequately supported,
 - Notifying relevant bodies,
 - Implementing internal disciplinary procedures where appropriate.
21. The SCO will deal swiftly and thoroughly with any persons who has attempted or succeeded in fraudulent or corrupt behaviours and will be robust in the response to dealing with matters of financial malpractice.

Prevention

22. It is recognised that a key preventative measure in the fight against fraud and corruption is to take effective steps at the recruitment stage to establish, as far as possible, the previous record of potential employees in terms of the propriety and integrity. Recruitment is therefore required to be in accordance with applicable policy and procedures and as a minimum will require written references regarding honesty and integrity before employment offers are made.
23. The PFCC, DPFCC and all SCO employees are expected on commencement to sign for understanding of and to follow a code of conduct.
24. The 7 Nolan Principles of Public Life, Appendix 2, apply to people who serve the public. The SCO operations are built on the foundations of these behaviours. Where employees make declarations, these will be recorded by the Chief Executive in a register of interests, which is made publicly available where they concern senior posts within the SCO.
25. The PFCC, DPFCC and all SCO employees are also required to declare in a publicly available register any offers of gifts or hospitality which are in any way related to the performance of their duties within the SCO.
26. Significant emphasis has been placed on the thorough documentation of financial systems and every effort is made to continually review and develop these systems inline with best practice, to ensure efficient and effective internal controls. The adequacy and appropriateness of the SCO, Force and FARS financial systems is independently monitored by both Internal and External Audit. Senior management places great weight on being responsive to audit recommendations.
27. Arrangements are in place to develop and encourage the exchange of information between the SCO, Force, FARS and other agencies on national and local fraud and corruption activity.

Detection and Investigation

28. The array of preventative systems, particularly internal control has been designed to provide indicators of any fraudulent activity, although generally they should be sufficient in themselves to deter fraud.
29. It is the responsibility of management to prevent and detect fraud and corruption. However, it is often the alertness of staff and the public that enables detection to occur and appropriate action to be taken when there is evidence confirming that fraud or corruption may have been committed.

30. Despite the best efforts of managers, supervisors and auditors, many frauds are often discovered by chance or 'tip-off', the SCO has arrangements in place to enable such information to be properly dealt with.
31. Depending on the nature and anticipated extent of the allegations, Internal Audit will normally work closely providing management and the investigating team with advice to ensure that all allegations, suspicions and evidence are properly investigated and reported upon.
32. If the allegation is against the PFCC or DPFCC, in the first instance the matter will be handled by the Police Fire and Crime Panel. If the allegation is of a criminal nature this will be referred to the IOPC who will manage the investigation. If deemed not serious enough for criminal investigation it will be referred back to the panel for resolution.
33. Investigations into individuals conduct will be handled inline with the appropriate disciplinary/misconduct policy, without prejudice to any criminal investigation. In addition, civil legal action may be taken for the recovery of misappropriated money or property.
34. All managers and supervisors should ensure that controls are in place to prevent and detect fraud and errors. This is a need to be aware of the possibility of fraud and corruption when being presented with for example, financial documentation or claim forms. Issues that may raise suspicion are:
 - Documents that have been altered, use of correction fluid, different pens or handwriting,
 - Claims that cannot be checked against an event or product, particularly if prior authorisation was not given,
 - Confused, illegible text and missing details,
 - Delays in documentation completion or submission,
 - Lack of vouchers, or receipts to support claims.

Training

35. The SCO recognises the success of this Anti-fraud and Corruption Policy and its credibility will depend on the effectiveness of training and the responsiveness of the SCO employees, the PFCC and DPFCC.
36. The SCO supports induction and continued professional development, particularly for those who are responsible for and involved with systems of internal control. This ensures responsibilities and duties are regularly reviewed and reinforced.
37. SCO employees are made aware that ignoring such training and/or choosing to operate outside of policy and procedure will be subject to disciplinary action.

Conclusion

38. The SCO has in place a clear network of systems and procedures to assist in maintaining high standards of performance and conduct. The SCO keeps pace with any developments at both local and national levels for prevention and detection techniques.
39. The SCO maintains a continuous overview of developments in the area of fraud and corruption through the Chief Executive and the Senior Leadership Team, with particular

attention on Financial Regulations, Accounting Principles, Governance Frameworks and Internal and External Audit reports and horizon scanning.

40. This policy will be subject to regular review and in any event if there are changes to legislation or if there has been a significant fraudulent or corruption incident.

Further Information

41. This policy relates to the operation of the SCO due to complexities of the Governance Arrangements it may need to be read in conjunction with the Anti-fraud and Corruption Policies as written by Staffordshire Police or Staffordshire Fire & Rescue.
42. The Whistleblowing Policy or Grievance Policy can provide advice on routes to resolution of concerns.
43. Misconduct policy will advise of routes taken against individuals alleged to have committed fraud and/or corruption.

7 Principles of Public Life: The Nolan Principles

Selflessness

Holders of public office take decisions in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family or their friends.

Integrity

Holder of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in their performance of the official duties.

Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards or benefits, holders of public office should make choices on merit.

Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership

Holders of public office should promote and support these principles by leadership and example.