

## Buckinghamshire Fire & Rescue Service

### OC 21

#### Counter-Fraud and Corruption policy

##### Policy statement

**Buckinghamshire and Milton Keynes Fire Authority is committed to protecting the public funds to which it has been entrusted. As a consequence the Fire Authority aims to minimise the risk of fraud and safeguard public funds by developing a counter-fraud culture, developing robust control systems, encouraging the reporting of suspected fraud, investigating all allegations of fraud and assisting police in their investigations and prosecutions and taking appropriate action to recover from fraudsters any assets wrongfully obtained.**

**This Counter-Fraud and Corruption policy is to advise and guide members and employees of the Authority, contractors, suppliers, partner organisations and service users, on the Authority's approach to issues of fraud and corruption. This document provides an overview of the strategy and includes guidance on how the Authority will deal with allegations of fraud and corruption.**

##### Document history

Issue 2.0 has been rewritten to better fit with a number of other policies and codes of practice. For this reason no areas of the document has been highlighted to indicate where a change has been made.

Issue 3.0 has been reviewed to fit with the review of other policies and codes of practice. For this reason no areas of the document have been highlighted to indicate where a change has been made.

Issue 4.0 has been reviewed to fit with the review of the latest policies and codes of practice. The only changes made have been to the policy title of Counter-Fraud and Corruption whereas previously this was referred to as Anti-Fraud and Corruption.

Issue 4.1 has been reviewed and minor changes have been made to reflect links to updated policies and job titles.

Department: Finance & Assets  
Author: Mark Hemming  
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## Introduction

The Fire Authority expects all members, employees, consultants, contractors, suppliers and partner organisations, to act honestly and with integrity and to safeguard the public resources for which they are responsible, and to provide any help information and support necessary to deal with fraud and corruption.

The Authority will not tolerate any level of fraud or corruption; consequently, any case will be thoroughly investigated and dealt with appropriately. The Authority is committed to ensuring that opportunities for fraud and corruption are reduced to the lowest possible level of risk.

Where relevant, the Authority will include appropriate clauses in its contracts about the consequences of fraud, bribery and corruption; evidence of such acts is likely to lead to a termination of the particular contract and may lead to prosecution. In respect of employees, the Authority's disciplinary rules are such that fraud and corruption are considered to be potential gross misconduct and if proven, will normally result in dismissal.

This Policy is based on a series of comprehensive and inter-related procedures, designed to prevent, detect and deter fraud and to take effective action against any attempted or actual fraudulent act affecting the Authority or its assets.

## Scope

The purpose of this Policy is to outline the Authority's approach for dealing with the threat of fraud and corruption. It applies to: -

- elected members of the Fire Authority
- employees at all levels
- organisations, contractors, suppliers and partners associated with the Authority
- users of our services

and covers any matter that may be construed as attempted or actual fraud or corruption affecting the Fire Authority both from internal or external sources examples of which may include:

- *Financial Issues* i.e., where individuals or companies have fraudulently obtained money from the Authority, (e.g. invalid invoices/work not done).
- *Resource Issues* i.e., where there is a misuse of resources, (e.g. theft of cash / assets)
- *Other Issues* i.e., activities undertaken by officers of the Authority that may be unlawful; against the Authority's Standing Orders or policies; falls below established standards or practices; or amounts to improper conduct, (e.g. receiving unapproved hospitality).

## Annex A

This list is not exhaustive - advice and guidance can be obtained from the Authority's Internal Auditors.

### **Culture**

The Authority actively promotes a culture of openness and honesty in all its dealings and has recently updated its [Code of Conduct](#). It also has in place a [Code of Conduct for Councillors and Co-opted Members](#) together with procedures, for members and key employees with procurement powers, to declare financial and other interests and any gifts and hospitality.

To ensure that all employees understand this policy, it will be explained to all new employees and members as part of their induction procedure. Line managers are responsible for conducting an awareness programme for current employees.

The Authority has in place three Committees whose monitoring roles are relevant.

- The Overview and Audit Committee, which sets and monitors standards of conduct for members, reviews the activities of the Internal Audit function including reports of any significant investigations and the management response to recommendations. It also scrutinizes and challenges proposals made by officers and decisions taken by members.
- The Executive Committee, determines the code of conduct for Members and considers other financial matters on recommendation from the Overview and Audit Committee.
- The Fire Authority agrees plans, policies and strategies and considers any other matters on recommendation from the Executive Committee.

### **Raising Concerns**

The Authority's employees play an important part in creating, maintaining and promoting this culture and are encouraged to voice any serious concerns about any suspicion of fraudulent or corrupt activities using the Authority's '**Whistle Blowing**' policy. This policy aims to ensure that any concerns raised will be properly investigated in a professional and confidential manner.

### **Members Concerns**

If any member suspects fraud they should in the first instance approach the Chairman of the Overview and Audit Committee who will refer the matter to the Chief Fire Officer for investigation by the internal audit function.

### **Other Stakeholders Concerns**

Members of the public are also encouraged to report concerns through the Fire Authority's [Local Code of Conduct Complaints Process](#).

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## Roles & Responsibilities

### **Responsible Officer**

Under the Local Government Finance Act 1988, the Chief Finance Officer of the Authority is designated as the section 112 responsible officer and is responsible for ensuring that the Authority has adequate systems of internal control and measures in place to enable the prevention and detection of fraud and corruption.

The Chief Finance Officer is also responsible for maintaining an effective system of internal audit of the Authority's accounting records and control systems, and has a statutory right of access to the Authority's documents, records, and information necessary for that purpose.

The Chief Finance Officer will:

- take overall responsibility for the maintenance and operation of this Policy;
- maintain records of financial malpractice, including concerns and allegations received; matters arising from audits; investigations and evidence; and the outcomes;
- report as necessary to the Authority.

### **Managers**

Managers are responsible for establishing and implementing effective controls to help prevent and/or detect incidents of fraud or corruption, for addressing key business risks, ensuring that employees are aware of their responsibilities and comply with the Authority's counter-fraud policy, and for creating an environment where employees feel able to raise any concerns they may have.

In the event that a complaint about a member of staff might result in disciplinary proceedings it is important that the rights of the employee under the [Discipline Procedure](#) are respected and managers should ensure that any investigation is compatible with the requirements of the disciplinary policy.

## Recruitment & Training

The Authority strives to employ people who have high standards of propriety and integrity and will obtain written references prior to confirming appointments of any duration and undertake police checks where appropriate.

On appointment, employees undertake induction training part of which is familiarisation with specified policies, including all ethical policies (e.g. Counter-Fraud and Corruption) and Standing Orders. When any of these policies are amended every employee is consulted on the change, prior to approval being sought from the Authority, and are notified when policies have been approved and where they are held.

### Rules & Regulations

The key features of the system of internal control are summarised in the **The Authority's Annual Governance Statement**, published with the Fire Authority's Statement of Accounts.

There are a number of procedures, rules and guidelines that are an important part of the internal control process and it is important that members and employees familiarize themselves with them. Whilst this list is not exhaustive (as policies are being continually reviewed and developed) among these are:

- The [Local Code of Conduct Complaints Process](#) details the procedure to be adopted if a complaint is made against the service.
- [Standing Orders Relating to Contracts](#) give guidance on the minimum levels of control required for contracts.
- The [Discipline Procedure](#) is designed to help and encourage employees to achieve and maintain appropriate standards of conduct.
- [Financial Instructions](#) approved by the Fire Authority set out financial procedures.
- [Financial Regulations](#) detailed within the Combined Fire Authority's Regulation Order 1996 constitutes the framework in which the financial management of the Fire Authority should operate.
- The [Whistle Blowing Procedure](#) which provides clear avenues for employees to raise concerns and to receive feedback on how these concerns have been addressed; take matters further if they are dissatisfied with the Authority's response and protect them from possible reprisals or victimisation for whistle blowing in good faith.

**If anyone breaches these rules and regulations formal action will be taken which may include ending employment or referring members to the Overview and Audit Committee.**