



HUMBERSIDE FIRE AND RESCUE SERVICE

Finance & Procurement

Professional Standards Anti-Fraud and Corruption Policy

Owner	Executive Director of Finance/ S.151 Officer
Responsible Person	Joint Deputy Chief Finance Officer & Deputy S.151 Officer
Date Written	December 2018
Date of Last Review	December 2023
Date of next review	December 2026
EIA	December 2023



What we must
do well



How we support our
communities



We value and support
the people we employ



We efficiently manage
the Service

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1. INTRODUCTION

Humberside Fire Authority (HFA) (including Humberside Fire and Rescue Service, (HFRS) is committed to the highest possible standards of integrity, openness, probity and accountability. The management of the risk of fraud and corruption and ensuring that effective counter fraud arrangements are in place are key elements of Corporate Governance. This document outlines the approach for dealing with the threat of fraud and corruption and makes clear to all concerned that appropriate and decisive action will be taken against those committing or attempting to commit, fraudulent or corrupt acts against the Authority and/or HFRS. A Fraud Response Plan is included (Part B) which gives more detailed guidance on how to deal with allegations of fraud and corruption.

Our communities expect HFA to conduct its affairs with integrity, honesty, openness and to demand the highest standards of conduct from those working for it.

HFA recognises that sound systems of public accountability are vital to effective management and to maintain confidence in the Service and is committed to protecting the public funds entrusted to it. This Anti-Fraud & Corruption Policy outlines HFA's commitment to creating an anti-fraud culture and maintaining high ethical standards in its administration of public funds. A culture of honesty and openness is a key element in tackling fraud.

In order to prevent, discourage and detect fraud, the Authority has in place and will continue to develop appropriate controls and procedures. These are inter-related and are designed to frustrate fraud or corruption. They cover culture, prevention, detection and training.

This Policy should be read in conjunction with HFA's [Constitution](#) and other relevant policies, for example, HFA's Whistleblowing Policy and Anti-Bribery Policy

Core Code of Ethics

HFRS has adopted the Core Code of Ethics for Fire and Rescue Services. The Service is committed to the ethical principles of the Code and strives to apply them in all we do, therefore, those principles are reflected in this Policy.

National Guidance

Any National Guidance which has been adopted by HFRS, will be reflected in this Policy.

2. AIM AND OBJECTIVES

This Policy aims to:

- Avoid the consequences of fraud and corruption, which are costly, time consuming, threaten morale and ultimately damage the standing and reputation of HFA.
- Encourage confidence in raising concerns of fraud or corruption.

- Reassure employees that if they raise any concerns in good faith and reasonably believe them to be true, they will be protected from possible reprisals or victimisation.
- Provide an effective mechanism for members of the public to raise genuine and serious concerns.

3. EQUALITY, DIVERSITY AND INCLUSION

HFRS has a legal responsibility under the [Equality Act 2010](#) and a commitment to ensure it does not discriminate either directly or indirectly in any of its functions and services or in its treatment of staff, in relation to race, sex, disability, sexual orientation, age, pregnancy and maternity, religion and belief, gender reassignment or marriage and civil partnership. It also has a duty to make reasonable adjustments for disabled applicants, employees and service users.

4. ASSOCIATED DOCUMENTS

- [Equality Impact Assessment](#)
- Legal References
There are no specific legislative requirements relevant to this policy.
- National Guidance
There is no specific National Guidance relevant to this policy.

5. INTERFACE WITHIN OTHER POLICIES

Issues of Member Conduct are matters which are dealt with through HFA's Governance, Audit and Scrutiny Committee. Please refer to the Authority's website www.humbersidefire.gov.uk ([Complaints about Members](#)) for further information or speak to HFA's Monitoring Officer on (01482) 393100.

Humberside Fire and Rescue Service operates a Complaints Policy and Procedure. This enables members of the public to raise any questions or make complaints about the performance of the Service. It also has a Whistleblowing Policy which encourages staff to raise concerns in good faith. The Whistleblowing Policy can be found at www.humbersidefire.gov.uk. Members of the public are not precluded from using the Whistleblowing Policy but should only do so where they feel that the Complaints Policy is not appropriate to the concern they wish to raise.

There is significant similarity for employees in respect to the Whistleblowing Policy and this Anti-Fraud and Corruption Policy. The procedure is almost identical, as is the protection afforded to an employee raising a genuine concern in good faith. In essence the Whistleblowing Policy is much broader and relates to significant concerns. Fraud is a protected disclosure under that policy.

6. WHO IS COVERED BY THIS POLICY?

This Policy applies to all employees of HFA, whether temporary or permanent. It also applies to all Members (including Independent Co-opted Members), Consultants,

contractors, agents, partner organisation, suppliers, and the users of our Service.

In addition, HFA also expects our communities to be honest in their dealings with the Authority.

7. WHAT IS FRAUD, CORRUPTION AND BRIBERY?

Fraud is: Theft, willful and quite distinct from accidental error or negligence. For practical purposes, fraud can be defined as dishonest conduct with the intention to make gain, or cause loss or the risk of a loss to another.

Fraud may involve one or several people, whether from within or external to HFRS. Fraud is defined in the Fraud Act 2006.

Examples of fraud include:

- Unlawfully obtaining money or property belonging to HFRS.
- Forgery.
- Falsification of records for personal gain.
- Deliberate falsification of facts or manipulation of management information, including personal expenses.
- Abuse of position.
- Failure to disclose information when there is a legal duty to do so.

Corruption is offering, giving, soliciting or acceptance of an inducement or reward to defraud Humberside Fire and Rescue Service. Corruption normally involves two or more people.

Bribery - The Bribery Act 2010 created four criminal offences:

- A general offence covering offering, promising or giving a bribe.
- A general offence covering requesting, agreeing to receive or accepting a bribe.
- A separate offence of bribing a foreign official to obtain or retain business.
- A strict liability offence for commercial organisations where they fail to prevent bribery of those acting on their behalf (section 7 of the Act).

The Act includes severe penalties; individuals can receive unlimited fines and a ten-year sentence, organisations can receive unlimited fines. Senior officers can also be convicted of an offence where they are deemed to have given their consent or connivance to giving or receiving a bribe or bribing a foreign public official.

The Authority has in place an Anti-Bribery Policy.

8. CULTURE AND STANCE AGAINST FRAUD AND CORRUPTION

Responsibility for an anti-fraud culture is a shared duty of all those involved in giving political direction, leadership, determining policy and management.

Both Members and Officers will lead by example, ensuring that the adopted Constitution is adhered to. This Policy supports a culture to enable concerns to be raised.

HFA has the Governance, Audit and Scrutiny Committee in place whose monitoring roles are important to the effectiveness of this Policy. The Committee comprises Independent Co-opted Members. More information concerning the Governance, Audit and Scrutiny Committee can be found at www.humbersidefire.gov.uk.

HFA believes that the maintenance of a culture of honesty and openness is a key element in tackling fraud. The Code of Conduct for Members and staff are based on the Nolan Principles of Standards in Public Life which can be viewed on the government website [here](#).

9. CORPORATE FRAMEWORK AND CULTURE

HFA has a range of interrelated policies and procedures that provide a corporate framework to counter fraudulent activity. In addition to this Policy, these have been formulated in line with appropriate legislative requirements, and include:

- Constitution
- Code of Corporate Governance
- Risk Management Policy
- Codes of Conduct for Members and Officers
- Accounting procedures and records
- Sound internal control systems
- Effective internal audit, provided by TIAA
- Effective recruitment and selection procedures
- Disciplinary Procedure
- Whistleblowing Policy
- Anti-Bribery Policy
- Anti-Money Laundering Policy
- The Regulation of Investigatory Powers Act (RIPA) Procedure
- Complaints Procedure
- Training

10. PREVENTION

Generally

HFA recognises that fraud and corruption are costly, both in terms of reputational risk and financial losses. The Authority has a Risk Management Policy and an established risk management process to identify and assess potential strategic risks.

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The risk of fraud and corruption must be considered as part of this process and appropriate controls put in place to mitigate the risk. The prevention of fraud is therefore a key objective of the Authority and respective roles and responsibilities are outlined below.

In order to combat fraud and corruption, it should be prevented from happening in the first place. It is essential that there are clear rules and procedures, within which Members, employees and others associated with the Authority and HFRS can work. A number of these are documented in [Section 9](#).

The Authority and HFRS aim to have sound systems and procedures in place, which incorporate efficient and effective controls. Special arrangements will apply where employees are responsible for cash handling or are in charge of financial systems and systems that generate payments. Managers must ensure that relevant training is provided for employees and that formal documented procedures are in place. Suitable levels of internal checks must be included in working procedures and maintained, particularly financial procedures, and it is important that duties are organised so that no one person can carry out a complete transaction without some form of checking process being built into the system (i.e., separation of duties).

Managers must ensure that computer system access is set at the relevant level for each employee.

Fraud and corruption risks should be considered within all new systems, policies and procedures to remove apparent weaknesses.

As part of HFA's overall arrangements to deter the occurrence of financial irregularities Internal Audit will target specific risk areas. In addition, the Internal Audit Strategy provides for regular reviews of system financial controls and specific fraud and corruption tests, where appropriate intelligence led audits are undertaken.

Regularity audits of functions aim to ensure compliance with HFA's Constitution and interrelated policies and procedures. The scope of Internal Audit's work has been extended into governance areas including codes of conduct and policy review procedures.

External Audit (Mazars) is required to give an opinion of the Authority's accounts which involves the assessment of the systems of financial control and the legality of transactions. They have a responsibility to review the Authority's arrangements for preventing and detecting fraud and irregularities, and those which are designed to limit the opportunity for corrupt practices.

Partners and all other stakeholders are expected to have strong Anti-Fraud and Corruption measures in place, with appropriate policies and procedures. They should provide HFA with full access to their financial records and their staff will be required to assist fully with any investigation. Agreements or contracts should include these conditions and appropriate risk assessments should be undertaken before entering into an agreement.

There are confidential lines of communication available for individuals to provide

information that may prevent fraud and corruption. These include the Authority's Whistleblowing Policy and the Authority's Complaints Procedure. See the [Fraud Response Plan at Part B](#).

Employees

A key preventative measure in the fight against fraud and corruption is to take effective steps at the recruitment stage. These will be to establish, as far as possible, the previous record of potential staff in terms of their honesty and integrity. In this regard, temporary staff should be treated in the same manner as permanent officers.

Staff recruitment will be undertaken in accordance with HFA's policies for Recruitment and Selection. Whenever possible, written references should be obtained regarding the known honesty and integrity of potential members of staff before formal employment and offers are made.

All staff must abide by HFA's Code of Conduct for Employees, which sets out requirements on personal conduct. All staff are expected to follow the codes of conduct laid down by their respective professional institutes.

HFA recognises that staff are often the first line of defence in preventing fraud. The responsibility for fraud prevention rests with all employees. Staff should therefore be alert to the possibility of fraud and to report any concerns.

HFA has in place disciplinary procedures for all employees. Those found to have committed any acts of impropriety will be dealt with in accordance with these procedures. Where criminal activity is suspected or found, the matter will be referred to the police for investigation and possible prosecution, in accordance with the Criminal Acts Procedure. In addition, restitution will be sought from those who are found to have perpetrated fraudulent acts.

All staff must operate within Section 117 of the Local Government Act 1972, regarding the disclosure of pecuniary interests in contracts relating to the Authority, of the non-acceptance of any fees, gifts, hospitality or any other rewards, other than their proper remuneration. These requirements are set out in HFA's Code of Conduct for Employees. The Monitoring Officer will also seek annual returns from more senior staff in respect to financial dealings.

Members

All Members and Independent Co-opted Members are required to operate within:

- Code of Conduct
- Humberside Fire Authority's [Constitution](#)

These matters and other guidance are specifically brought to the attention of Members at the induction course for new Members and are in each Member's Reference File. They include rules on the declaration and registration with the Monitoring Officer of potential areas of conflict between Members' Fire Authority duties and responsibilities and any other areas of their personal or professional lives.

HFA have adopted an Anti-Fraud and Corruption Policy. Members are expected to play an important role through leading by example and being seen to support it.

All Members are required to give a written undertaking to comply with the Code of Conduct.

Internal Control

HFA has a Constitution, which includes financial regulations, contract regulations and accounting procedures.

The Executive Director of Finance /S.151 Officer is the designated officer having a statutory responsibility under Section 151 of the Local Government Act 1971 to ensure proper arrangements are made for the Authority's financial affairs. In addition, under the Accounts and Audit Regulations 2003, the Authority is required to maintain an adequate and effective internal audit of its financial records and systems of internal control.

HFA Secretary is the designated Monitoring Officer under the Local Government and Housing Act 1989.

The Authority has developed systems and procedures that incorporate effective and efficient internal controls. All the Authority's employees are required to ensure that these controls are properly maintained. In particular, employees are responsible for the maintenance of controls within their own jurisdiction. The Authority's internal and external auditors independently monitor compliance with the overall control environment and advise upon the continuing effectiveness and appropriateness of these controls.

The Authority's formal Annual Governance Statement is a key document which is approved annually and included within its financial accounts.

Combining with others to Prevent and Fight Fraud

There are a variety of arrangements in place which facilitate the regular exchanges of information between HFA and other local authorities and agencies for the purpose of preventing and detecting fraud. These involve national, regional and local networks of investigators such as internal auditors, trading standing officers, housing benefits investigators etc.

HFA operates a Verification Framework; data matching will also be undertaken. This is recognised as an important tool in the prevention and detection of fraud and is used by many other local authorities. The Audit Commission has drawn up a Code of Data Matching Practice for its National Fraud Initiative (NFI), which is recognised by the Information Commissioner as complying with Data Protection legislation.

11. DETECTION AND INVESTIGATION

The Fraud Response Plan provides direction and guidance to employees in dealing with suspected cases of theft, fraud and corruption. It also gives direction to others wanting to report matters of concern. The Response Plan is set out in Part B of this

Policy and should be read in conjunction with this section.

Internal Audit and the Executive Director of Finance have in place liaison arrangements for the sharing of information and joint working where appropriate for investigating irregularities and system weaknesses within HFRS.

All the Authority's control systems have been designed to deter and detect any fraudulent activity, but they can never provide a complete protection against fraud or corruption. It is often the alertness of employees and/or the public that detects fraud or corruption and enables appropriate remedial action to take place. Members and employees must notify an Authorised Officer as soon as possible if fraud or corruption is suspected. This process is covered more fully below and in Part B of this Policy.

All allegations of fraud or corruption will be investigated. The Police will decide upon criminal prosecutions and the Authority's internal disciplinary procedures will be implemented in addition. In appropriate cases, the Authority or its insurers will take civil action to recover losses arising from financial impropriety.

12. TRAINING AND AWARENESS

The Authority recognise that the success and credibility of this Policy will depend largely on how effectively it is communicated throughout the Authority, HFRS and beyond and are committed to raising fraud awareness. It will be provided to Members as part of the Constitution, included on induction programmes and published on the Authority website.

The Authority provides induction and follow-up training for all Members and employees which covers this Policy and the concepts of internal controls. A special emphasis will be placed on employees involved in internal control systems to ensure that their particular responsibilities and duties are regularly highlighted and reinforced.

Where appropriate, Internal Audit and the Executive Director of Finance will publicise the results of any investigation to promote awareness, to deter, and to demonstrate the need for preventative measures.

13. GIFTS & HOSPITALITY

It is important that Members and employees avoid generating the impression or suspicion that they have a conflict of interest. They must not give the impression that they have been or may be influenced by any gift, hospitality or other consideration to show favour or disfavour to any person or organisation while acting in an official capacity. Members and employees must not encourage any gift, reward or benefit from any member of the public or organisation with whom they have been brought into contact through their official duties.

Guidance is issued upon the declaration of gifts and hospitality and registers exist for both Members and employees. Members and employees must always seek advice before accepting any gifts or hospitality.

14. ASSURANCES FOR EMPLOYEES MAKING DISCLOSURES UNDER THIS POLICY

If you do report a suspected fraud, you will **not** be at risk of losing your job or suffering any form of retribution as a result, provided that:

- your disclosure is made in good faith
- you reasonably believe that information, and any allegation contained in it, is substantially true
- you are not acting for personal gain

The Public Interest Disclosure Act 1998 protects employees against detrimental treatment or dismissal. This Policy has been introduced in accordance with the Act. For further information upon the Act please contact the Executive Director of Finance/S151 Officer. Alternatively, please go to Protect, an independent charity at <https://protect-advice.org.uk/>.

15. ANONYMOUS ALLEGATIONS OF SUSPECTED FRAUD OR CORRUPTION

HFA encourage employees to disclose their names when reporting a suspected fraud. Concerns expressed anonymously are much less powerful and are often more difficult to investigate or substantiate. Feedback cannot be provided.

In considering whether to investigate an anonymous allegation, particular consideration will be given to:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of substantiation from other sources
- The ability to discover the facts
- The justification for maintaining anonymity

16. CONFIDENTIALITY

HFA will treat all reports of suspected fraud in a confidential and sensitive manner. The identity of the individual may be kept confidential provided this does not hinder or frustrate any investigation. However, there will be occasions where the identity of the individual needs to be revealed. For example, where the individual is required to give a witness statement or give evidence at a formal hearing, where allegations of misconduct or criminal activity are involved. Serious fraud will be referred to the Police for criminal investigation.

17. UNTRUE ALLEGATIONS OF FRAUD

If allegations are made in good faith, but are not confirmed by the investigation, no action will be taken against the complainant. Employees are protected by HFA's Whistleblowing Policy. If, however, malicious, vexatious, mischievous or reckless allegations are made then other action may be considered if the complainant is an

employee.

18. HOW TO REPORT A SUSPECTED FRAUD

As a first step, you should normally raise concerns with your immediate manager, who will then consult with an Authorised Officer. This depends, however, on the seriousness and sensitivity of the issues involved and any potential conflicts of interest.

Authorised Officers

Alternatively, you may raise a concern directly with one of the following Authorised Officers:

Authorised Officer	Contact number	Contact email	Address
Chief Fire Officer & Chief Executive	(01482) 567509	Click here	Humberside Fire and Rescue Service, Service Headquarters, Summergroves Way, Kingston upon Hull, HU4 7BB
Deputy Chief Fire Officer & Executive Director of Service Delivery	(01482) 567174	Click here	
Assistant Chief Fire Officer & Executive Director of Corporate Services	(01482) 567509	Click here	
Executive Director of Finance & S.151 Officer	(01482) 567509	Click here	
Executive Director of People & Development	(01482) 567509	Click here	
Area Manager Emergency Response	(01482) 567174	Click here	
Area Manager Prevention, Protection, Fleet & Estates	(01482) 567174	Click here	
Area Manager Service Improvement	(01482) 567174	Click here	

Alternative Contacts

If you feel it inappropriate to contact an Authorised Officer, you may raise a concern directly with one of the following representatives of the Fire Authority:

Alternative Contact	Contact details	Address
Chairperson of Humberside Fire Authority	(01482) 393204 Email ChairpersonHFA@humbersidefire.gov.uk	Humberside Fire Authority, Fire and Rescue Service Headquarters, Summergroves Way,
Chairperson of Governance, Audit & Scrutiny Committee	(01482) 393899 Email ChairpersonGAS@humbersidefire.gov.uk	
Monitoring Officer	(01482) 393100	

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& Secretary to Humberside Fire Authority	Email committeemanager@humbersidefire.gov.uk	Kingston upon Hull, HU4 7BB
*The Head of Internal Audit	0845 300 3333 Email enquiries@tiaa.co.uk	TIAA, Artillery House, Fort Fareham, Newgate Lane, Fareham, PO14 1AH

* This is a private, independent organisation who are employed to audit HFA.

Contact may be by telephone or face to face, but serious concerns are better raised in writing, whether by post or email. Those making disclosure are asked to set out the background and history of their concern, giving names, dates and places where possible, and the reason why they are particularly concerned about the situation. The earlier the concern is expressed, the easier it is to take action.

Concerns of a suspected fraud may be put in writing or raised initially orally, and then confirmed in writing. Written allegations should include:

- All relevant background
- The nature of the fraud and corruption that is alleged
- Relevant dates where possible
- The names of individuals against whom the allegations are made
- Any supporting evidence, including documentation

Is Proof of Fraud Needed?

When raising a concern, you will not be expected to provide proof beyond reasonable doubt of an allegation, but you will need to be able to demonstrate that there are reasonable grounds for your concerns. Where possible notes should be kept of what the individual has seen, heard or felt. Notes should be dated, and copies of all relevant information kept.

19. ALLEGATION CONCERNING THE CHIEF FIRE OFFICER & CHIEF EXECUTIVE

Where an allegation is made concerning the Chief Fire Officer & Chief Executive or an Executive Director, you should raise this with either the HFA Monitoring Officer, Head of Internal Audit or the Chairperson of HFA – see [Section 18](#) for their contact details.

The Monitoring Officer has dispensation to appoint an external party to carry out this role when the allegations impinge on the roles of the key governance monitoring posts.

20. HOW THE AUTHORITY WILL RESPOND – THE ANTI-FRAUD RESPONSE PLAN

Please refer to Part B of this Policy which outlines the procedure which will be followed.

21. RAISING CONCERNS EXTERNALLY

You are encouraged to raise any concerns internally. However, in certain circumstances the Public Interest Disclosure Act 1998 provides protection to employees who make certain disclosures outside Humberside Fire Authority. You can find out more information from HFA's Whistleblowing Policy. In brief an employee may consider this route, for example when they have a justifiable concern that their disclosure would not be dealt with properly by the Authority, or that the Authority may be constrained in its statutory powers to address the concern adequately. The protection relates to financial malpractice, impropriety or fraud, a failure to comply with a legal obligation, criminal activity or a miscarriage of justice.

Mazars – External Auditor

Mazars are the external auditors of the Authority. As such, in the first instance, is the most likely body to be considered in instances of **fraud, corruption and misuse/abuse of public funds or powers**. Their local contact details are:

Mazars,
The Corner
Bank Chambers
26 Mosley Street
Newcastle
NE1 1DF
United Kingdom
Tel: 0191 3836300

Any employee who is considering making an external disclosure is encouraged to first take advice to ensure that the disclosure falls within the provisions of the legislation, and that all internal avenues have been fully explored. If an employee does decide to take the matter outside the Authority, they should ensure they do not disclose any confidential information.

22. FURTHER ADVICE AND GUIDANCE

A process flow diagram (Appendix 2) and a check list of Dos and Don'ts is provided as a quick reference for employees at the end of this policy ([Appendix B](#)).

23. WHO CAN PROVIDE SUPPORT OR ADVICE (TO EMPLOYEES)

We are committed to maintaining a safe and supportive work environment for everyone. Below are internal and external routes staff can use to speak up, raise a concern and get support.

Most speaking up happens through conversations with supervisors and line managers where challenges are raised and resolved quickly. We strive for a culture where that is normal, everyday practice and encourage you to explore this

option it may well be the easiest and simplest way of resolving matters. However, you have other options: Station Managers, Group Managers, TLT and SLT member with responsibility for the subject matter you are speaking up about.

Via Your Line Manager

Your line manager is a key point of contact for reporting concerns and seeking support. They are here to listen, provide guidance, and ensure that your concerns are addressed appropriately. Whether you have questions about workplace policies, encounter issues with colleagues, or require assistance with personal matters affecting your work, your line manager is there to support you.

If, for any reason, you feel uncomfortable discussing your concerns with your line manager, we have established multiple channels for reporting concerns anonymously or confidentially.

Through our Policies and our Professional Standards Policies

Various routes are included in our Policies and our Professional Standards Policies listed below:

- Anti-Fraud and Corruption
- Complaints
- Dignity at Work (anti Bullying and Harassment)
- Disciplinary
- Exits From the Service
- Equality and Inclusion
- Grievance
- Menopause
- Mediation
- Personal Relationships at Work Policy
- Safety Event Reporting Recording and Investigation Arrangements
- Whistleblowing

Our Internal Bullying and Harassment Hotline

Bullying will not be tolerated within Humberside Fire and Rescue Service. Our Dignity at Work policy clearly defines bullying and how to report it.

The Service's 'Zero Tolerance' campaign has a very simple strapline - **SUPPORT - CHALLENGE - REPORT** - and we encourage our employees to do just that.

Internal Freedom to Speak Up Routes

The Freedom to Speak Up model was developed in health and has six key elements; we have used the model as the basis for the HFRS process. How we implement 'Valuing' and 'Modelling' Speaking Up within HFRS will be developed from the 'ground up' by listening to staff about how line managers and the

organisation can value and model Speaking Up.

Our 'Freedom to Speak Up Guardian' can support you to speak up if you feel unable to do so. The Guardian will ensure that people who speak up are thanked for doing so, that the issues they raise are responded to, and that the person speaking up receives feedback on the actions taken. You can find out more about the guardian role [here](#).

Additional information relating to Freedom to Speak Up Routes can be found [here](#).

Contact HR

You can contact your HR team, in complete confidence, on: 01482 567572.

This number will take you through to one of our HR advisers who will listen to what has caused you to feel the way you do.

You don't need to provide names and you will receive completely confidential advice as to how to manage any issues you raise.

Employee Assistance Programme

As part of an ongoing commitment to employee wellbeing, Humberside Fire and Rescue Service Occupational Health Team are very pleased to offer all employees confidential support, with free access to emotional and practical support through CiC's Confidential Care Service.

The service is provided by CiC, an external organisation, who are entirely independent, so support and advice are completely confidential. You can call the Confidential Care line as often and for as long as you need to discuss any issues you would like support with.

The Confidential Care service is available 24 hours a day, 7 days a week, 365 days a year and is accessed by calling the freephone number: 0800 085 1376.

Independent Speak Up

This service aims to provide a safe space for staff to speak up when something isn't right in the workplace:

- Discrimination, victimisation and harassment (on gender, sexual orientation, disability)
- Misogyny and violence against women and girls
- Health and safety breaches
- Fraud and corruption
- Poor or unsafe working practices

The service is available online or via phone [here](#).

Service users can remain anonymous or can choose to provide their name and

contact details which will then be shared for confidential use by the Fire Service.
You may also wish to speak to:

- A colleague
- A trade union representative
- The Humberside Fire Authority Counselling Service
- Protect – UK Charity

You may wish to discuss the concern with a colleague or trade union representative first and may find it easier to raise the matter if there are other colleagues who share the same concerns. A trade union representative or work colleague may accompany a member of staff at any meetings or interviews in connection with the concerns raised.

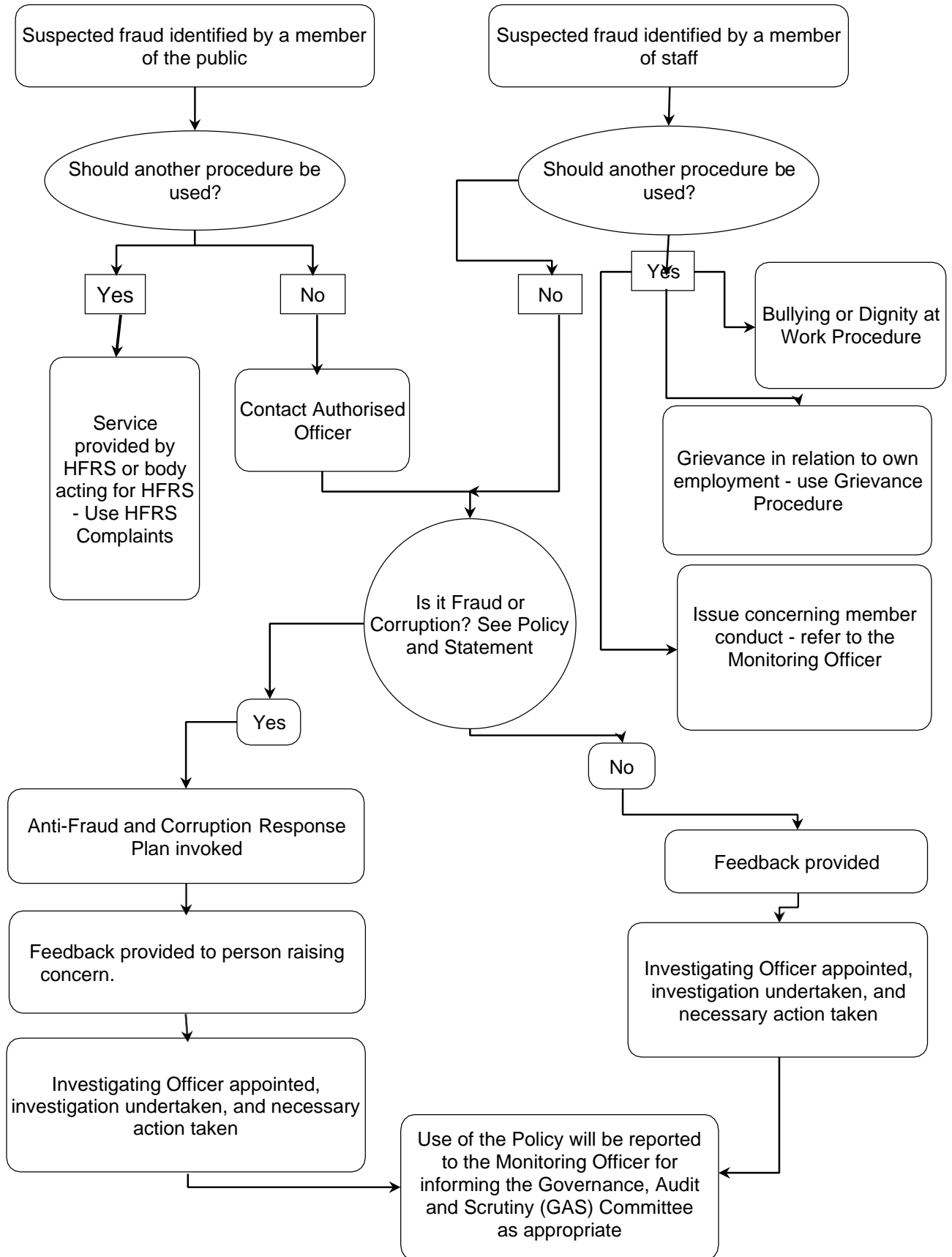
Further guidance is set out under the Whistleblowing Policy.

24. REVIEW OF POLICY

The S.151 Officer and HFA will ensure the continuous review and amendment of this policy document, to ensure that it remains compliant with good practice, national public sector standards, primarily CIPFA's Code of Practice on Managing the Risk of Fraud and Corruption and the Local Government Fraud Strategy – Fighting Fraud Locally and meets the needs of HFA.

**If you require any further guidance / information regarding this document,
please contact Head of Finance.**

APPENDIX A: ANTI-FRAUD AND CORRUPTION POLICY FLOW CHART



APPENDIX B

CHECKLIST OF DOs AND DON'Ts

Do

- (a) Make dated notes of your concerns and retain them.
- (b) Think about the risks and outcomes before you act.
- (c) Follow the guidance provided and contact the appropriate officer.
- (d) Deal with the matter promptly if you feel your concerns are warranted.

Don' t

- (a) Do nothing.
- (b) Be afraid to raise your concerns.
- (c) Approach or accuse any individuals directly.
- (d) Try to investigate the matter yourself.
- (e) Use the Anti-Fraud and Corruption Policy (or Whistleblowing Policy) to pursue a personal grievance.

PART B: ANTI-FRAUD AND CORRUPTION POLICY (FRAUD RESPONSE PLAN)

1. HOW TO REPORT A SUSPECTED FRAUD

Any suspicion of fraud or corruption will be treated seriously.

Your suspicion should be reported to your Line Manager or Authorised Officer. If you are not an employee, then your suspicion should be reported to an Authorised Officer. Please refer to Part A, particularly [Section 18](#).

Before reporting a suspected fraud, you should read the Anti-Fraud and Corruption Policy (Part A), particularly the guidance and flow chart ([Appendix B](#)).

2. WHAT WILL HAPPEN UPON DISCLOSURE?

The Authorised Officer will:

- Acknowledge receipt in writing within 10 working days.
- Make a record of the details of any oral disclosure and confirm these in writing to the Complainant within 10 days.
- The Authorised Officer will consult Internal Audit (unless the disclosure is made directly to Internal Audit, in which case Internal Audit shall consult with a further Authorised Officer).
- The Authorised Officer may determine that:
 - The disclosure should be investigated by Internal Audit.
 - The disclosure should be progressed under a different Humberside Fire and Rescue Service procedure.
 - The disclosure is of such seriousness to refer to the Police.
 - The disclosure should be referred to the External Auditors
 - The disclosure should be the subject of an inquiry.
 - The disclosure is in accordance with the Anti-Fraud and Corruption Policy.
 - The disclosure can be resolved without investigation
 - The disclosure can be dismissed upon substantive grounds, for example the inability to investigate.
 - The disclosure should be referred to the Humberside Fire Authority's insurers.

3. INVESTIGATING OFFICER

Subject to paragraph 2 above, the Authorised Officer will identify an appropriate person (the Investigating Officer) to carry out any investigation, according to the nature of the issue. This will normally be a member of the Internal Audit Service.

Where, however, the Authorised Officer considers that the suspected fraud is of such seriousness to warrant referral to the Police, then an Investigating Officer may

not be appointed.

4. ROLE OF THE INVESTIGATING OFFICER (WHERE APPOINTED)

The Investigating Officer will conduct an investigation into the suspected fraud, which will normally include:

- Hold a formal meeting with the Complainant to discuss the disclosure
- Arrange interviews with relevant witnesses
- Ensure the complainant and any witnesses have the right to be accompanied by a representative/colleague at any meeting
- Establish the facts/obtain statements/collect all evidence
- Maintain detailed records of the investigation process
- Report findings in writing to the Authorised Officer
- Make any recommendations for action
- Act as a witness at any subsequent disciplinary hearing if required

(For complaints involving the Chief Fire Officer & Chief Executive the report will be to the Chairperson of the Humberside Fire Authority)

The Investigating Officer will confirm in writing to the Complainant:

- How the matter will be dealt with.
- The names of any other investigating officers.
- An estimate of the timescale for responding to the concerns raised.
- Whether the Complainant will be required to attend an investigatory interview and the right to be accompanied by a trade union representative or work colleague.
- Any further information or evidence that the discloser is required to provide.
- Details of employee support mechanisms and where further advice on the procedure can be obtained.

5. WITNESSES

Where the investigation involves interviews with any witnesses, it will be the responsibility of the Investigating Officer to write to them confirming details of:

- The allegations under investigation
- The procedure under which the investigation will be conducted
- The right to be accompanied by a trade union representative or colleague at any investigation interview
- Details of employee support mechanisms

Action	Timescale	By Whom
Written acknowledgement of disclosure	10 working days	Authorised Officer
Notice to attend investigation interview	At least 5 working days	Investigating Officer
Investigation interviews	Within 20 working days of receipt of complaint	Investigating Officer
Report of Findings/ Communicate outcome to Complainant	30 days of receipt of complaint	Investigating Officer

Whilst the Investigating Officer will need to adhere to the timescales indicated, the nature of some serious concerns may require the investigation to take longer than a month. Some matters can be dealt with more speedily. The Complainant will be kept informed as to progress.

6. LIAISON WITH EXTERNAL AUDIT AND THE POLICE

External Audit

The Authority has a duty to report all significant frauds to the External Auditors.

Police

Where criminal activity is suspected or known, particularly if it is on a more than petty level, the Police must be involved and dependent on the severity and scale of the offence, will carry out investigations and institute criminal prosecutions. It is the policy of the Police to welcome early notification of suspected fraud. They will also advise on the most appropriate means of investigation. Initial contact with the Police will be undertaken by one of the Authority's statutory or principal officers, as may be appropriate in each individual case. This will be determined by the Chief Fire Officer & Chief Executive, the S.151 Officer and the Secretary.

If the Police decide that formal investigation is necessary, all Members and employees must co-operate fully with any subsequent requestor recommendations. All contact with the Police will usually be via the Investigating Officer.

Police investigation does not preclude internal disciplinary procedures. Co-ordination is essential to avoid prejudicing either and to optimise use of resources.

7. REPORT OF INVESTIGATING OFFICER

As soon as the initial stage of the investigation has been completed, the Investigating

Officer shall report to the Authorised Officer. This may lead to the Authorised Officer taking additional steps under [Section 2](#).

A final report in writing shall be submitted by the Investigating Officer to the Authorised Officer as soon as reasonably practicable. The report shall be confidential and shall set out:

- Background to the allegations
- Key facts established
- Procedure followed
- Key findings and conclusions
- Recommendations

The report will be reviewed by Internal Audit, the Chief Fire Officer & Chief Executive, S.151 Officer and Secretary/Monitoring Officer.

In particular, consideration will be given to appropriate next steps as indicated in paragraphs 8 to 13 below. The report will be kept confidential to the Fire Authority, unless disclosure is required for legal reasons.

8. DEALING WITH THE OUTCOME OF THE INVESTIGATION

Misconduct

Where the investigation concludes that there is a case of misconduct to answer against an employee, then the Disciplinary Procedure shall be invoked.

If the disclosure is found to be malicious and not in good faith, then the Investigating Officer may recommend that the Disciplinary Procedure be invoked.

Legal Proceedings

Where a fraud or corruption is proven, then a likely outcome may be criminal prosecution and/or civil proceedings against the perpetrator(s).

If the Case is Groundless

If it is decided that the disclosure was groundless, the Investigating Officer will explain this to the person who made the disclosure.

Governance, Audit and Scrutiny (GAS) Committee

Reporting the use of this policy and a summary of the findings of any investigations under this process will be reported to the Committee via the Monitoring Officer as appropriate.

Communicating the Outcome

The aim of this Policy is to assure employees that their concerns are properly addressed. The Authorised Officer will inform the person who made the disclosure of

the outcome of the investigation, any action taken and their right of appeal.

In addition, actions arising from a Whistleblowing investigation will be made available to all staff in order to further promote and build trust and confidence in the process. Such information will not identify the person who made the disclosure, or the employee concerned.

Learn from Past Experience

Where a fraud has occurred, then arising from the investigation process and an Audit report to Members, there will be an action plan to ensure that the Authority learns from experiences of fraud and corruption.

9. SUPPORT DURING AND AFTER AN INVESTIGATION

Support

Where necessary and appropriate, Humberside Fire Authority will provide support, counselling or mediation to any person affected by an investigation in order to ensure normal working relationships are resumed as effectively as possible.

10. APPEAL

If the person who made the disclosure is dissatisfied with the investigation's outcome, they may request that the Authorised Officer review the findings. This request must be in writing within 10 working days of the notification of the findings being published. The Authorised Officer will consider the request and respond in writing within 10 working days, setting out whether or not sufficient grounds exist for the disclosure to be investigated further.