

**Eastbourne Borough Council
Counter Fraud Prosecution Policy**



**COUNTER FRAUD
PROSECUTION POLICY**

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1. Statement of Intent

Eastbourne Borough Council is committed to paying people who have a genuine entitlement to Housing Benefit and granting appropriate Council Tax Reduction, Single Person Discount, Social Housing, Exemptions and Discounts in relation to Council Tax and Non Domestic Rates. It also has a statutory duty to protect public funds and make proper provision for the administration of their financial affairs. This includes the prevention and detection of fraud.

The aim of the Council is to take measures to deter fraud being committed at the start of any claim, put a stop to fraud and error discovered during a claim and ensure appropriate sanctions are applied to any customer fraudulently claiming a discount or benefit.

Eastbourne Borough Council has an award winning, dedicated and qualified Fraud Team to investigate allegations of fraud and error and identify weaknesses in working practices.

2. Housing Benefit & Council Tax Reduction

Housing Benefit and Council Tax Reduction fraud occurs when someone has failed to report a change in their circumstances or given / provided false statement / documents in order to claim Housing Benefit and/or Council Tax Reduction to which they are not entitled.

3. Council Tax Discounts and Exemptions

Discount and Exemption fraud is where someone claims a reduction or exemption on their council tax to which they are not entitled.

4. Non Domestic Rates

Non-domestic rate, or business rate, fraud is when a business avoids paying Business Rates or makes a false statement when submitting an application for a relief or exemption.

5. Social Housing

Social housing fraud is unlawful and in some cases is also a criminal offence. Eastbourne Borough Council is committed to identifying and investigating any cases of fraud.

Social Housing Tenancy fraud arises when the property is occupied unlawfully by someone other than the tenant and can include:-

- Subletting a property for profit to people not allowed to live there under the conditions of the tenancy
- Providing false information in a housing application to gain social housing
- Wrongful tenancy assignment and succession where the property is no longer occupied by the original tenant and
- Failing to use the property as the principal home, abandoning the property, or selling the keys to a third party.

6. Legal Gateway

Investigations and formal procedures will be instigated against offenders taking into account:-

- Police & Criminal Evidence Act 1984
- Criminal Procedures & Investigations Act 1996
- Data Protection Act 1998
- Regulatory Investigatory Powers Act 2000
- Social Security Administration Act 1992
- Council Tax Reduction Scheme (Detection of Fraud and Enforcement) Regulations 2013
- Local Government Finance Act 1992
- Social Housing Act 2013
- Council Tax (Admin and Enforcement) regulations 1992

7. Sanctions

This Council will consider prosecuting, or offering a Formal Caution or Administrative Penalty (where legislation allows) as an alternative to prosecution, in cases where it is considered that sufficient evidence exists, to prove beyond reasonable doubt, that fraud has been committed. These cases will have satisfied the "Evidential" and "Public Interest" tests. This will be the normal position with the exception of the following:

- Where there is evidence that the offender has significant mental ill health
- Where the offender is terminally ill
- Where the offender is vulnerable
- Where the offender was misled and, it is considered, acted in ignorance
- Where extenuating social circumstances exist, and the set of circumstances are so exceptional that, had they not been experienced by the claimant, then the person would not have committed the offence
- Where the amount is so small that to impose a sanction would not be a good use of public funds

7.1.1. Decisions on Sanctions

The decision to refer a case for sanction is a serious matter for all the parties involved and each case will be examined on its own merits on a consistent and impartial basis. The decision to treat a fraud as serious and to impose a sanction will be taken by the Fraud Manager and Revenues & Benefits Manager. The decision to refer the matter for prosecution will be taken in consultation with the Council's Principal Lawyer. A record of the decision and reasons for particular sanctions will be made and retained for all cases.

7.2. Sanction Criteria

For a case to be considered for sanction, the following must be demonstrated:

- A good case to answer (prima facie)
- Sufficient evidence of false information
- Sufficient evidence of fraudulent intent
- A complete record of the investigation
- Investigation undertaken in accordance with the Counter-Fraud Officer's Code of Conduct ([Appendix A](#))
- Pursuing a sanction is in the best interest of the Council and the public
- The fraud committed is considered serious

7.3. Serious Fraud

Serious fraud is found where one or more of the following categories are satisfied:

- The sum of money defrauded is significant
- The period of time over which the fraud has been perpetrated is protracted
- The person is a persistent offender i.e. fraud incentives have been claimed or fraudulent overpayment identified on one or more previous occasions as a consequence fraudulent activity
- The case has arisen from a collusive action between two or more persons
- The person is an Elected Member or employee of Eastbourne Borough Council
- The circumstances of the case are such that had intervention by Counter-Fraud Officers not taken place, one or more of the above criteria may have arisen.

7.4. Best Interests of the Council and the Public

The initiation and possible outcome of the sanction must be in the best interests of the Council and the public. In determining this, consideration of the following will be made:

- The age of the person;

- The physical and/or mental health of the person, partner or dependant;
- Such other personal circumstances of the individual which would mitigate against prosecution;
- Any failings in the Council's administration procedures which have enabled a fraud to proceed; and
- Any period of avoidable delay in bringing the circumstances to the attention of the relevant authorities.

7.5. Formal Cautions

A formal caution is an oral warning given to a person who has committed an offence and can be offered as an alternative to prosecution when there is sufficient evidence to justify instituting criminal proceedings. A caution can only be offered where the person has admitted the offence during an Interview Under Caution (IUC). If the caution is refused, the authority must refer the matter for prosecution.

Whilst the caution cannot be cited in court, it may be referred to in any subsequent report submitted for prosecution. A formal caution is a meaningful deterrent for those persons at the lower end of the range of benefit fraud and a caution would normally be considered in cases where:

- Criminal proceedings are not the first option
- Penalty action is not appropriate
- The period over which the fraud was perpetrated is less than three months
- The circumstances of the offence and the person indicate a caution may be appropriate

7.6. Administrative Penalties

An Administrative Penalty (Adpen) is a financial penalty amounting to 30% of the gross adjudicated overpayment. For offences occurring wholly on or after 8 May 2012, the minimum amount of the Adpen is £350. For overpayments totalling over £700, the Adpen is set at 50% of the recoverable overpayment, rounded down to the nearest whole penny, up to a maximum Adpen of £2,000. Section 115a of the Social Security Administration Act 1992, as amended by section 15 of the Social Security Administration (Fraud) Act 1997, introduced financial administrative penalties as an alternative to prosecution.

Council Tax Reduction offences will be subject to a 50% Adpen of the falsely obtained reduction (subject to a minimum of £100 and a maximum of £1000) and for attempted fraud cases the penalty is set at £100 in accordance to the Council Tax Reduction Regulations 2013.

An Administrative Penalty will be appropriate:-

- Where a recoverable overpayment or reduction occurs as a result of an act, or omission, on the part of the offender and grounds exist for instituting criminal proceedings for an alleged offence, whether or not the person admits the offence, and;
- Where the use of the penalty is judged as providing sufficient deterrent for re-offending, but where there is a good probability of the Council recovering the penalty from the offender's own resources.
- Where prosecution is a possibility but not the preferred option with regard to the individual merits of the case.
- Where an individual's personal and financial circumstances indicate that a financial penalty would be a suitable solution.

7.7. Council Tax Reduction & Discount/Exemption Penalties

Eastbourne Borough Council may impose a penalty of £70 where a person who is claiming a Council Tax Reduction:

1. Fails to report a change of circumstances within 21 days.

In addition, Eastbourne Borough Council may impose a £70 penalty where a person who is claiming a council tax or non domestic rates discount/exemption:-

2. Fails to notify the Authority, without reasonable excuse, on any matter which affects entitlement to discount.
3. Fails to notify that their dwelling is no longer an exempt dwelling.
4. Fails to notify the Authority that they are jointly liable for the tax.
5. Fails to supply relevant information requested in order to establish liability.
6. Fails to supply relevant information requested after the issue of a Liability Order has been obtained. Failure to supply could lead to a criminal prosecution and a fine.
7. Provides false information in relation to their application for discount/exemption.

Where a penalty has been imposed for failing to supply relevant information and a further request to supply the same information is made, a further penalty of £280 may be imposed for each subsequent failure, provided:

- It is in the debtor's possession.
- The authority requests him to supply it.
- It falls within a prescribed description of information.

7.8. Prosecutions

The Council retains the discretion to refer all cases for prosecution, but will generally only refer where the criteria, noted in paragraph 2 has been satisfied and where one of the following conditions is met:

- It is considered that an overpayment would normally be too serious to offer alternative sanctions.
- Where the fraud/offence continued over a long period. The Council considers a 'long period' to be over 9 months.
- Where the fraud was calculated and deliberate, planned from the outset.
- Repeat offenders, regardless of the level of sanction imposed for their first offence, will be automatically considered for prosecution.
- Where the offender was in a position of trust (e.g. a member of staff)
- Where the alleged offence has risen from a collusive landlord/employer and is considered to amount to a serious fraud.

8. Loss of Benefit Provision

The Loss of Benefit Provision (LOB) introduced by the Social Security Fraud Act 2001 is designed to be a deterrent against the continued abuse of the benefit system by applying a benefit sanction against those who commit benefit fraud.

The provision allows for the Department for Work and Pensions or in non passported Housing Benefit cases, Eastbourne Borough Council to apply a sanction.

For offences that occur wholly on or after 1st April 2013, the following will apply:-

Level 1 – Offences which result in an Administrative penalty (Adpen) or Caution will result in a LOB of 4 weeks.

Level 2 – For a first benefit fraud conviction the LOB penalty duration will be 13 weeks.

Level 3 – Where there are two offences, within a set time period, with the latter resulting in a conviction the LOB penalty will be for a period of 26 weeks.

Level 4 – A 3 year LOB penalty will be imposed where there are three offences within a set time period, the latter resulting in a conviction.

Level 5 – An immediate 3 year LOB for serious organised and identify fraud cases.

For offences committed on or after 1st April 2010 until 31st March 2013, it is possible to impose a restriction on benefit payment for 4 weeks when a claimant, their partner or a family member had been convicted, or had

accepted a Caution, or an Administrative Penalty for a first benefit fraud offence.

For offences committed between 1st April 2008 and 31st March 2010, a 13 week sanction may be imposed if a claimant, their partner or a family member has been convicted of a 2nd fraud offence within 5 years of the previous conviction.

For offences committed before 1st April 2008, a 13 week sanction may be imposed if a claimant, their partner or a family member has been convicted of a 2nd fraud offence within 3 years of the previous conviction.

*Claimants who are entitled to out-of-work means tested DWP benefits or tax credits can be entitled to a range of other support, including Housing Benefit, which is known as passported benefit.

9. Council Members' and Employees' Roles & Responsibilities

The Council is determined that the culture and tone of the organisation is one that reflects this policy in securing the public purse and accepts that tackling fraud is everybody's business.

The Council expects Councillors and employees to lead by example in ensuring opposition to fraud and recognises that they are important elements in the stance against fraud. It is the role and the responsibility of staff and Members to report any possible improprieties in the systems and they are positively encouraged to raise any concerns with the Chief Finance Officer where the matter will be dealt with in the strictest of confidence.
(Whistleblowing Guide – [Appendix B](#))

10. Elected Members

Although Members are not part of the decision making process in individual cases, they have a duty to protect the assets of the Council from fraud and acknowledge this in accepting their appointments.

Where there is an allegation involving an elected Member, the Chief Executive will be informed at the outset and Counter-Fraud Officers will carry out investigations in partnership with the Council's Internal Audit section. Upon completion of an investigation, a full report will be considered in accordance with any financial regulations and standing orders governing Members.

11. Council Employees

Employees are encouraged to be alert to the possibility of fraud at all times in the workplace. The Council requires all employees to behave towards the Council with integrity and without intent or actions involving fraud.

Where there is an allegation involving a Council employee, the Senior Head of the relevant service will be informed at the outset and Counter-Fraud Officers will carry out investigations in partnership with the Council's Internal Audit section. Upon completion of an investigation, a full report will be considered in accordance with the Council's disciplinary procedures.

12. Counter Fraud Team – Code of Conduct

Officers within the Counter-Fraud Team are employed in positions of trust and thus should, at all times, act professionally, lawfully, honestly and with integrity.

Any working practice that calls these criteria into doubt will seriously undermine the credibility of the Council. As a result, the Council expects such Officers to comply with The Counter Fraud Code of Conduct – ([Appendix A](#)) Any officer found to have breached the rules will be subject to the Council's disciplinary procedures.

13. Publicity

Publicising the Council's Counter-Fraud Policy and activity will reassure the public and raise awareness that tackling fraud is everybody's business. However, a balanced approach must be taken to ensure that individuals who are legitimately entitled to claim benefit, a council tax reduction and/or business rates reductions/exemptions do so.

14. Fraud Hotline

Eastbourne Borough Council operates and will continue to operate a dedicated fraud hotline that is manned during office hours and an answer phone service is available outside office hours. Messages are picked up daily. The service is free, confidential and available to the public, elected members and employees for the purpose of reporting alleged benefit fraud. The number is 0800 7317039 and callers can choose to remain anonymous. This service is advertised at every opportunity and various forms of publicity medium are used.

15. Policy Review

The Counter-Fraud Prosecution Policy will be reviewed at least annually by the Fraud Manager in consultation with the Revenues and Benefits Manager to ensure continued relevance, effectiveness and that it reflects any legislative changes.

This Counter-Fraud Prosecution Policy is not designed to be a definitive document, and any prosecutions will always have deference to the individual's circumstances.

Eastbourne Borough Council
COUNTER FRAUD PROSECUTION POLICY
Appendix A

Counter Fraud Code of Conduct

- 1.** Officers within the Fraud Team are employed in positions of trust and thus should, at all times, act professionally, lawfully, honestly and with integrity. Any working practice that calls these criteria into doubt will seriously undermine the credibility of the Council. As a result the Council expects such Officers to comply with this Code of Conduct. Any officer found to have breached the following rules will be subject to the Council's disciplinary procedures.
- 2.** Eastbourne Borough Council takes the safety and well being of its staff seriously. As a result every effort must be made to ensure officer safety at all times; in particular during interviews and visits that can lead to heightened tension, threats of violence or official complaints. This code details the conduct expected by all such officers whilst recognising the uniqueness of the Fraud Team.
- 3.** When undertaking visits, officers will always carry identification cards and will always present these before entry to any premises. If at any time during a visit the officer is asked to leave they must do so immediately. A note should be made at the time (or as soon as reasonably practicable afterwards) as to the reason why they were asked to leave.
- 4.** Officers will at all times be aware of the possibility of compromising their integrity, or that of the Council, by carrying out unaccompanied visits. Officers should seek advice from a senior officer prior to carrying out unaccompanied visits in the following circumstances:
 - visits to individuals with known mental health conditions.
 - visits during hours of darkness.
 - visits to hostels or accommodation providing Care in the Community.
 - visits to individuals considered to be potentially violent.
- 5.** All Fraud Officers must adopt a common sense approach when visiting addresses where children are known to be present and/or the address is occupied by single women/men. They should be aware of the possibility

of allegations of impropriety and should therefore take appropriate steps to reduce this risk as follows:

- if the door is answered by a child who invites the officer inside, entry to the premises should not be undertaken until an adult has been seen and agrees to entry. Children should not be interviewed. Similarly, if the door is answered by any person in a state of undress/partial dress then the officer should ideally say that they will return when it is more convenient for the customer or consider asking the customer to dress more suitably. If the officer is in any doubt as to whether it is appropriate to enter the premises then entry should not be made.
 - any instances where the above applies should be recorded on a report sheet and the appropriate systems updated when the officer returns to the office.
 - officers must at all times be aware of the potential for violence from customers. They must not place themselves in a situation where there is a risk of attack.
 - officer should check all records to see if a person is known to have mental health problems, prior to any interview or visit.
 - officers must not carry out unaccompanied interviews or visits to anyone with known mental health problems or potentially violent individuals.
- 6.** If any threat of violent conduct is made against an officer the details must be passed to the Fraud Investigations Manager so that details of the threat can be discussed and consideration given to completing an incident report form for inclusion on the Customers of Concern Register.
 - 7.** If a complaint is made against any officer during the visit, the officer will pass a full written report of the allegation to the Fraud Investigations Manager upon their return to the office.
 - 8.** Officers must at all times ensure that they are contactable by mobile phone, whilst conducting official business on behalf of the Council. All Officers must ensure that they contact the nominated person at the end of the working day, if they do not intend to return to the council offices. Officers are personally responsible for ensuring that they comply with any mobile telephone laws.
 - 9.** All officers must at all times ensure that their whereabouts are known whilst conducting official business on behalf of the Council. A full record of visits planned should be recorded and available to appropriate officers prior to leaving the office. The record must indicate a visit start time where known.

- 10.** Officers will at all times ensure that information held by the Council is only disclosed in line with the Data Protection Act 1998 and the procedures concerning confidentiality.
- 11.** Officers should not investigate any member of the public who is a relative or friend. If an officer has been requested to investigate someone who is known to them in this way they should bring the matter to the attention of their line manager.
- 12.** Officers should not, under any circumstances, accept cash from customers. This is to avoid any potential difficulties afterwards where disputes arise.
- 13.** Fraud Officers must declare immediately any personal interest they may have in the Register of Interests. An interest is defined as any person, property or business about which the officer has a direct/indirect involvement. In addition to this, the officer will not have any involvement in the investigation or verification of alleged fraud in such cases.
- 14.** Officers will treat all customers with respect and courtesy at all times.
- 15.** Officers will follow at all times the Home Office Codes of Conduct guidance as set out under the Police and Criminal Evidence Act 1984 (PACE) and work within the requirements of the Criminal and Investigations Act 1996.
- 16.** At all times during an investigation, the rights of any individual who is being interviewed or investigated should be considered and observed. It is the duty of staff to establish the facts of the case and not make conclusions based on intuition or supposition.
- 17.** Surveillance must not be undertaken without having prior authority to do so. This authority must have been sought on the appropriate forms in accordance with the Regulation of Investigatory Powers Act 2000, the Home Office Code of Conduct and the Council's policy and procedure on surveillance.
- 18.** Officers will at all times comply with the Equality Act 2010.
- 19.** Communication assistance should be made available where necessary i.e. bi-lingual support or sign language.
- 20.** Officers will at all times comply with the Council's corporate Lone Working Policy.

**Eastbourne Borough Council
COUNTER FRAUD PROSECUTION POLICY
Appendix B**

Appendix **B**

WHISTLEBLOWING GUIDE

FOR
EMPLOYEES OF
EASTBOURNE BOROUGH COUNCIL

Whistleblowing Guide

1.1 Statement of Commitment

Employees are often the first to realise that there may be something seriously wrong within the Council. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Council. They may also fear harassment or victimisation. In these circumstances, employees may feel it would be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

The Council is committed to the highest possible standards of openness, propriety and integrity. In line with that commitment, staff and others with serious concerns about unlawful conduct, financial malpractice or dangers to employees, the public or the environment are encouraged to come forward and voice those concerns. This Guide makes it clear that staff can do so without fear of reprisals and is intended to encourage and enable staff to raise serious concerns within the Council rather than overlooking a problem or “blowing the whistle” outside.

The Whistleblowing Guide covers all employees of the Council including agency staff, home workers, trainees and contractors.

1.2 Aims and Scope

The Whistleblowing Guide aims to:

- Provide avenues for staff to raise concerns and receive feedback on any action taken
- Allow staff to take the matter further if they are dissatisfied with the Council’s response
- Reassure staff that they will be protected from reprisals or victimisation for whistleblowing in good faith

There are existing procedures in place to enable staff to lodge a grievance relating to their employment. This Whistleblowing Guide is intended to cover concerns that fall outside the scope of other procedures.

1.3 Safeguards

1.1.1 Prevention of Harassment or Victimisation

The Council recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The Council will not tolerate harassment or victimisation and will take action to protect staff when concerns are raised in good faith. This does not mean that if staff who whistleblow are already the subject of disciplinary or other employment related procedures, that those procedures will be halted.

1.3.2 Confidentiality

Whilst the Council gives an assurance that it will not tolerate the harassment or victimisation of anyone raising a genuine concern, it recognises that nonetheless an individual may want to raise a concern in confidence under this policy. The Council will do its best to protect the identity of staff who whistleblow and who do not want their name to be disclosed. However, in some circumstances the investigation process may reveal the source of the information and a statement may be required as part of the evidence.

1.3.3 Anonymous Allegations

This Guide encourages staff to put their name to any allegation they may make. Concerns expressed anonymously are much less powerful, but they may be considered at the discretion of the Internal Audit Manager (in consultation with other Officers as appropriate). In exercising the discretion, the factors to be taken into account would include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

1.3.4 Untrue Allegations

No action will be taken against staff who make allegations in good faith but which are not confirmed by the investigation. Disciplinary action however may be taken in cases where false or malicious allegations are raised.

1.4 How to Raise a Concern

The reporting route for concerns will depend on the seriousness and sensitivity of the issues and who is thought to be involved. Taking these factors into account staff may approach their Line Manager, their Head of Service, their Senior Head of Service, the Statutory Chief Finance Officer (Section 151 Officer), the Chief Executive or telephone the Internal Audit Manager on 5925. If deemed appropriate staff may invite their trade union or professional association to raise a matter on their behalf.

Concerns are better raised in writing giving the background, history and reason for the concern together with names, dates, places and as much information as possible. If staff do not feel able to put their concern in writing they can telephone or meet the officer they intend reporting to. Where appropriate arrangements can be made for disclosures outside normal working hours.

Staff are encouraged to express their concern at the earliest opportunity so that timely action can be taken.

Although staff will not be expected to prove the truth of an allegation, they should be able to demonstrate that there are sufficient grounds for the concern. If required, further advice and guidance on how matters of concern may be pursued can be obtained from the Internal Audit Manager.

1.5 How the Council Will Respond

The action taken by the Council will depend on the nature of the concern. The matters raised may:

- Be investigated internally by Management or Internal Audit
- Be referred to the Police
- Be referred to the External Auditor
- Form the subject of an independent inquiry.

In order to protect individuals and the Council, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations that fall within the scope of specific procedures, for example, discrimination issues, will normally be referred for consideration under those procedures. Some concerns may be resolved by agreed action without the need for investigation.

All concerns received will be acknowledged in writing within five working days. Wherever possible the acknowledgement will:

- Indicate how the matter is proposed to be dealt with

- Give an estimate of how long it will take to provide a final response
- Advise whether any initial enquiries have been made
- Advise whether further investigations will take place, and if not, why not.

The amount of contact between the officers considering the issues and the staff member raising the concern will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought.

When any meeting is arranged staff have the right, if they so wish, to be accompanied by a trade union or professional association representative or fellow worker who is not involved in the area of work to which the concern relates.

The Council will take steps to minimise any difficulties which staff may experience as a result of raising a concern. For instance, if staff are required to give evidence in criminal or disciplinary proceedings, advice about the procedure will be given.

The Council does recognise that an officer under investigation is entitled to advice. Contact with the Human Resources Section is recommended.

1.6 How the Matter Can Be Taken Further

This Guide is intended to provide staff with an avenue to raise concerns within the Council. The Council hopes that staff will be satisfied with the way their concerns are dealt with. If they are not, and if they feel it is right to take the matter outside the Council, the following are possible contact points:

- A local Council Member
- The External Auditor
- Relevant professional bodies or regulatory organisations
- A solicitor
- The Police.

In instances where staff do decide to take the matter outside the Council they must always ensure that, in the first instance, the Council has been given an opportunity to fully investigate the issues raised. The member of staff will also need to ensure that confidential information is not disclosed or that disclosure would be privileged. (Check with the contact point about that.)

1.7 Independent Advice

If you are unsure whether to use this procedure or you want independent advice at any stage, you may contact:

- Your Union or Professional Association
- Public Concern at Work (020 7404 6609). This is an independent charity that provides free advice for members of staff who wish to express concerns about fraud or other serious malpractice
- The Audit Commission's Whistleblowers Hotline (0845 052 2646)

1.8 The Responsible Officer

The Internal Audit Manager has overall responsibility for the maintenance and operation of this Guide. That Officer maintains a record of concerns raised and the outcomes, but in a form which does not endanger confidentiality, and will report as necessary to the Council.

Whistleblowing Summary

If you suspect fraud or corruption at the Council, please follow the following simple guidelines.

Do:

- Make an immediate note of your concerns
- Convey your suspicions to someone with the appropriate authority and experience
- Deal with the matter promptly

Don't:

- Do nothing
- Be afraid of raising your concerns
- Approach or accuse any individuals directly
- Try to investigate the matter yourself
- Convey your suspicions to anyone other than those with the proper authority

Rules for Making a Disclosure

- Disclosures of information must be made in good faith
- You must believe the information to be substantially true
- You must not act maliciously or make false allegations
- You must not seek any personal gain.