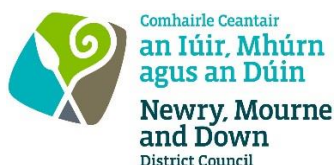


Policy title: Fraud Policy



Policy Control

Policy reference:	CS18
Title of Policy:	Fraud Policy
Version:	2.0
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1. Title of policy

Fraud Policy

2. Statement

The Council is committed to the prevention of fraud by developing, implementing and maintaining effective procedures and controls throughout the organisation. The Council is also committed to the promotion of an anti-fraud culture and expects all employees, agency staff, elected members, contractors, consultants, suppliers and service users to be fair and honest.

The Council takes a **zero tolerance** approach and will not therefore tolerate any level of fraud or corruption. All allegations will be dealt with in a fair and equitable manner and in the strictest confidence. Our approach has been developed and based on current best practice and is compatible with the Chartered Institute of Public Finance & Accountancy (CIPFA's) *Fighting Fraud and Corruption Locally Strategy, 2020-2025*.

The Council's approach is divided into 5 main areas of focus:



3. Aim

The aim of the policy is to set out the Council's stance on fraud, corruption or other dishonest acts and reinforce an open and honest culture. The Council is committed to the highest possible standards of openness, probity and accountability.

Specifically, the policy aims to:

- promote a culture of honesty; an anti-fraud culture.
- define and explain the roles of key parties to this framework.
- promote the prevention of fraud and corruption.
- aid the detection of fraud and corruption.

- ensure the effective investigation in all cases where suspected fraud or corruption has occurred.
- explain what we will do if we identify any cases of fraud and corruption and what action we will take.

4. Scope

This policy is concerned with:

- external fraud committed against the Council, for example by suppliers of goods and services, contractors in the course of their work or other persons;
- internal fraud committed against the Council, for example travel and subsistence fraud;
- internal fraud committed against Council employees, for example theft of personal property; and
- theft and bribery.

5. Related policies and legislation

Whilst the Anti-Fraud Policy forms part of the Council's wider governance arrangements, there are a number of policies and procedures that are particularly relevant:

- Financial Regulations and Procurement Procedures
- The Raising Concerns Policy
- The Grievance Policy and Procedures
- The Employee Code of Conduct
- The Northern Ireland Code of Conduct for Members
- The Complaints Policy
- Disciplinary and Dismissal Procedure
- Gifts & Hospitality Policy

Staff provide the best protection against fraud and financial impropriety. It is important that staff are aware of the Policies & procedures of the Council. The lack of clear guidance and ignorance of procedures will often be the first excuse used by offenders.

Council recognises that a key preventative measure in the fight against fraud, theft and corruption is to take effective steps at the recruitment stage. The recruitment of suitable staff is the Council's first defence in preventing fraud. Best practice recruitment policies such as detailed application forms including a statement on criminal records, references and verification of educational and professional qualifications will be strictly adhered to.

6. Definitions

Fraud

The term fraud is commonly used to describe the use of deception, to deprive, disadvantage, or cause loss to another person or party. The key legislation which may be used to prosecute fraud is the Fraud Act 2006. The Act refers to three main offences of fraud. An individual can be prosecuted under the Fraud Act 2006, if they are in breach of any of the following:

- *Fraud by false representation*, if someone dishonestly makes a false

representation and intends by making the representation to make a gain for themselves or another, or to cause loss to another or expose another to risk of loss. A representation is false if it is untrue or misleading, and the person making it knows that it is, or might be, untrue or misleading;

- *Fraud by failing to disclose information*, if someone dishonestly fails to disclose to another person information which he/she is under a legal duty to disclose and intends, by failing to disclose the information, to make a gain for themselves or another, or to cause loss to another or expose another to risk of loss; and
- *Fraud by abuse of position*, if someone occupies a position in which they are expected to safeguard, or not to act against, the financial interests of another person, and he/she dishonestly abuses that position, and intends, by means of the abuse of that position, to make a gain for themselves or another, or to cause loss to another or to expose another to a risk of loss.

Theft

Fraud is different to theft, which is defined in the 1968 Theft Act as: 'A person shall be guilty of theft if he dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it'.

Put simply, theft offences are again a dishonesty offence where an individual deliberately and dishonestly takes something (this can be something physical such as cash or an item or an intellectual property item such as an idea or design), that is not theirs to take and uses it for their own purposes without permission.

Examples of theft include the stealing of assets / goods / stocks, misuse grants and public funds for purposes other than they were made available or theft of cash or equipment.

Bribery

Bribery is defined in the Bribery Act 2010 as "giving or receiving a financial or other advantage in connection with the "improper performance" of a position of trust, or a function that is expected to be performed impartially or in good faith".

Put simply, bribery is the offering or acceptance of an incentive in order to do something that you know that you shouldn't, or not do something that you know you should. Bribery does not have to involve cash or an actual payment exchanging hands and can take many forms such as a gift, lavish treatment during a business trip or tickets to an event. The act created 4 main bribery offences:

- Bribing another person
- Requesting or accepting a bribe
- Bribing a foreign official
- Failure of a commercial organisation to prevent bribery

Whilst the Council is not normally considered to be a "commercial organisation", the term is used to describe any organisation in the UK that engages in commercial activities regardless of whether it pursues charitable, education aims or purely public functions. For the purposes of applying the Bribery Act 2010, the Council is treated as a commercial organisation and, therefore, needs to take appropriate steps, including the provision of appropriate procedures, to prevent bribery taking place.

a) Govern

The bedrock of the Fraud Policy is that those who are charged with governance support the activity by ensuring that there are robust arrangements and executive support to ensure counter fraud, bribery and corruption measures are embedded throughout the Council. Beating fraud is everyone's business. The internal arrangements that are put in place should be communicated throughout the organisation and publicly available to demonstrate the culture and commitment to preventing fraud.

b) Key Element - Acknowledge

Recognising that fraud exists is key to tackling fraud and corruption in any organisation. The Council acknowledges its responsibility for combatting fraud and corruption from both within and external to the organisation.

The Council is committed to creating an environment that is based on the prevention of fraud, bribery and corruption and the protection of public money by promoting a culture of openness and honesty in all Council activities.

The Councillors and Employees are encouraged to raise concerns regarding suspected fraud, bribery or corruption, regardless of seniority, rank or status, in the knowledge that such concerns will wherever possible be treated in confidence.

The Seven Principles of Public Life (also known as the Nolan Principles) apply to anyone who works as a public office-holder. All public office-holders are both servants of the public and stewards of public resources.

c) Key Element – Prevent

The Council has adopted a Constitution which shows responsibilities for decision making and includes various contract and financial procedure rules. All Members and officers are required to act in accordance with these rules and requirements when carrying out their duties. **Appendix 1** highlights the key roles and responsibilities for staff, members and other bodies in relation to fraud. **Appendix 2** provides examples of the key indicators of fraud.

The Council aims to have in place efficient and effective systems of control that as far as possible prevent fraudsters from exploiting weaknesses. The prime responsibility for maintaining such systems lies with Management. Support is given by the Council's Internal Audit Team, which provides an independent appraisal of the integrity of all internal control systems. The way in which the Council will seek to prevent and detect fraud or other financial impropriety is through:

- Effective risk management
- Effective internal controls
- Ensuring compliance with key policies and procedures
- Promoting fraud awareness through training
- Co-operating with other statutory agencies e.g. Police Service of Northern Ireland (PSNI)

Deterring fraud is a large part of fraud prevention. The Council is committed to taking all viable steps to prevent, deter, detect and remedy instances of fraud and corruption whether the threat is internal to the organisation or external to it. Key to this is the development and maintenance of an anti-fraud culture. Key anti-fraud/deterrent measures include:

- a commitment to pursue sanctions against those who commit fraud, bribery and corruption through the use of internal disciplinary arrangements.
- clear and active disciplinary and grievance arrangements.
- publicising the anti-fraud message on the intranet and Council website and on other interactions with the staff and public.
- planned fraud awareness campaigns.
- anti-fraud and corruption training.
- confidential reporting (Raising Concern) procedures.

Risk Management

A major element of good corporate governance is a sound assessment of the Council's business risks. The key to managing the risk of fraud is the same in principle as managing any other business risk and should be approached systematically at both the organisational and the operational level. The assessment of risk should be part of a continuous cycle rather than a one off event: as systems and the environment change, so do the risks to which departments are exposed.

Managers need to ensure that:

- Fraud risks have been identified;
- Each risk has been assessed for likelihood and potential impact and adequate and effective controls have been identified;
- Controls are being complied with and risks are reassessed as a result of the introduction of new systems or amendments to existing systems; and
- Where a fraud has occurred, or has been attempted, controls are reviewed and new controls implemented, as necessary, to reduce the risk of fraud reoccurring.

Internal Controls

At a basic level four elements are normally necessary for a fraud to occur:

- People to carry out the fraud. They may be individuals or group of people working inside or outside the Council;
- Assets of some form to acquire fraudulently;
- Intent to commit the fraud; and
- Opportunity.

The prevention and detection of fraud and corruption is only possible where strong internal controls are present and constantly applied. Routine checks and monitoring by management to ensure that procedures are being followed are therefore essential. Advice on the efficiency and effectiveness of various internal controls is available from the Internal Audit. The types of controls that should be in place include:

- Segregation of Duties - The functions of authorising transactions, recording the transactions and custody of the associated assets should be undertaken by separate staff.
- Organisation - There should be a clear organisation chart and all staff should have up to date job descriptions that clearly indicate their responsibilities.
- Authorisation and Approval - All transactions and decisions should be formally authorised by nominated staff.

- Physical - There should be suitable controls over access to offices, assets, equipment, vehicles, controlled stationery and computer systems.
- Management - This includes production of suitable financial and operational management information, use of exception reports, critical review and enquiry by management.
- Arithmetical and Accounting - This includes checking or re-performing tasks carried out by others, reconciliation between the bank and accounting records and control of accounts. It also covers costing (adding up) of orders, invoices, payroll etc.
- Personnel - Appointment of staff should be adequately controlled. All staff should be suitably trained for their post. Both Members and Officers must adhere to the NI Local Government Code of Conduct for Councillors and employees respectively.
- Supervision - All staff and activities should be adequately supervised by someone who understands the process and will detect deviations from accepted practice.
- Registers of Interests – Legislation requires that a register of both Councillors and Officers pecuniary interests are recorded. These interests maybe direct or indirect and maybe in contract other matters. Any queries regarding pecuniary and non-pecuniary interests should be addressed to the Director of Corporate Services. A register of Gifts and Hospitality must also be held.

The responsibility for preventing and detecting fraud lies with all staff. However, internal auditors are alert in all their work to risks and exposures that could allow fraud. Individual audit assignments, therefore, are planned and prioritised to assist in deterring and preventing fraud by examining and evaluating the effectiveness of control commensurate with the extent of the potential exposure/risk.

Policies and Procedures

The Council has in place a range of Policies and Procedures which detail specific measures and processes to be followed in the key areas where there is a potential risk of fraud. These are periodically reviewed in line with best practice and legislative requirements. Management at all levels shall ensure that their staff are aware of these Policies and Procedures and that the requirements of each are being met.

In respect of financial statements and transactions, the Council has in place a number of procedures and processes to mitigate the risk of misappropriation of funds and the risk that financial statements may be materially misstated due to fraud. These include:

- Manager review and sign off of individual transactions;
- Systems processing controls including multi-level user access and authorisation rights across all financial systems;
- Segregation of duties in all key areas;
- Monthly reconciliation of key control accounts;
- Frequent budget reporting to highlight significant variances or unusual transactions for investigation.

Training

The Council provides training to Members and employees both in a routine structured manner and on an ad hoc basis as the requirement becomes apparent. This training is focused on the role that each person fulfils within the organisation.

Co-operating with Statutory Agencies

The Council is committed to working and co-operating with other organisations to prevent fraud. Wherever possible, Council will be prepared to help and exchange information with other councils and organisations to deal with fraud in line with relevant Data Protection legislation.

The Council participates in the National Fraud Initiative, an exercise that is overseen by the Northern Ireland Audit Office (NIAO) that matches electronic data within and between public sector bodies to prevent and detect fraud.

Common Methods and Types of Fraud are included in **Appendix 3**, with examples of Good Management Practices which may assist in combating fraud detailed in **Appendix 4**.

d) Key Element - Pursue

Pursuing suspected fraud and error is also a key factor in the success of counter fraud activities across any organisation. The Council has a Fraud Response Plan which provides detailed fraud-response arrangements to enable any information gained or allegations made to be properly and effectively dealt with. The plan explains how any fraud allegations will be dealt with and who is responsible for carrying out the investigation.

It is the responsibility of every member of staff to report details immediately to Line Manager, Assistant Director, Director or Chief Executive if they suspect that a fraud has been attempted or committed, or see any suspicious acts or events. The requirement to report suspicions also includes any concerns you may have about employees, agency workers, contractors, consultants, suppliers and service users.

In addition to the above, it is recognised that the Council's Corporate Complaints Procedure has a part to play. Often, the complaints process is the first port of call for non-employees wishing to raise a concern about a process or event. It is important that concerns being raised through this route are dealt with properly and that it is recognised that where concerns are about fraud and corruption, that they are dealt with through the Raising Concerns Policy and the Fraud policy rather than the corporate complaints procedure. The route map at **Appendix 5** shows the relationship between the raising concerns, fraud, corporate complaints and grievance policies/procedures.

Staff should not be discouraged from reporting suspected fraud or financial impropriety, as all cases will be treated in the strictest confidence. The Council is fully committed to supporting and protecting staff who raise legitimate concerns and the anonymity of individuals who report any suspicions will be preserved if requested unless this is incompatible with a fair investigation or legal imperative.

The Council's Raising Concerns Policy is intended to encourage and enable staff to raise serious concerns. If an allegation is made in the public interest, but is not confirmed by the investigation, no action will be taken against the originator. It will always be assumed that concerns have been raised in good faith unless there is evidence to the contrary. If however the allegation is demonstrably made for an ulterior and undesirable purpose it will be deemed not to have been made in good

faith and disciplinary action may be considered against the individual making the allegation.

During any investigation, it is important to consider whether the PSNI or any other statutory agencies need to be involved and at what stage this involvement should start. The Council will work in partnership with the PSNI or any other statutory agencies to investigate and prosecute detected fraud and corruption. The extent of the involvement by the PSNI or any other statutory agencies will depend on what is being investigated, its size and complexity. Referrals to the PSNI or external agencies will be made at a suitable point in the case by the Fraud Response Group (FRG). The Assistant Director of Finance and Performance is responsible for the external reporting of all discovered fraud, proven or suspected, including attempted fraud within the Council to the NIAO and the PSNI.

Sanctions

The final stage in the pursue element is to take action against those where fraud has been confirmed. Action will be taken against those responsible for fraudulent acts wherever it is in the public interest to do so. Where the PSNI have been involved in any case and there is sufficient evidence to proceed, the Council will assist with any investigation. Where the PSNI have not been involved and it is in the Public interest, civil actions may be considered and taken by the Council.

The Council seeks to work with its partner agencies and other government agencies to take action against those that commit fraudulent acts. The Council will share information as appropriate with partner agencies wherever there is a clear and legal path for doing so. Generally, information required for the prevention and detection of fraud is exempt from the requirements of the Data Protection Act although any information requested must always be proportionate to the issue being investigated. The Council will comply with the requirements of the Data Protection Act and with the Regulation of Investigatory Powers Act in all its fraud investigations.

Details of action taken and investigations of any suspected frauds within the Council are reported quarterly to the Audit Committee and the NIAO.

e) Protect

Protecting against serious and organised crime, protecting individuals from becoming victims of crime and protecting against the harm that fraud can do to our community. For Council, this will also cover protecting public funds, protecting Council from fraud and cyber-crime and also protecting itself from future frauds.

7. Department and Officer responsible

Directorate / Department	Corporate Services, Finance and Performance
Officer(s) responsible for developing the policy	Assistant Director of Finance and Performance

8. Policy approval process

Meeting	Date
<i>CMT</i>	<i>16 May 2024</i>
<i>SMT</i>	<i>14 May 2024</i>
<i>Relevant Committee(s) e.g. Strategy, Policy and Resources Committee</i>	<i>Audit Committee – 23 May 2024</i>
<i>Monthly Council Meeting</i>	<i>3 June 2024</i>

9. Review Date

The policy will be reviewed in line with the Council's agreed policy review cycle i.e. every 4 years (as per Council's Equality Scheme commitment, refer to 4.31 of the Scheme), or sooner to ensure it remains reflective of legislative developments.

10. Procedures and arrangements for monitoring the implementation and impact of the policy

NMDDC has established guidelines on how Council staff and others should report suspicions or allegations of fraud and how the Council will handle them. A copy of the Fraud Response Plan can be found on the Internal Drive. This plan forms part of NMDDC Anti-Fraud policy.

11. Equality Screening

The policy has been screened, and it is not subject to an EQIA (with no mitigating measures required)

12. Rural Needs Impact Assessment

This policy has been subject to rural needs impact assessment.

Roles and Responsibilities

Fraud, Bribery and corruption flourishes where there are deficiencies in management control systems. It follows therefore that the primary responsibility for prevention and detection lies with management. Management is charged with taking all reasonable steps to limit the possibility of bribery, fraudulent and corrupt practices.

Elected Members

Members, in particular through Audit Committee, will give clear support to the Council's arrangements. The Council's Senior Management Team (SMT) will provide strong leadership by advocating the Council's arrangements. There is a strong correlation/relationship between good governance and good counter fraud operations. The Audit Committee will:

- Approve the policy and Fraud Response Plan;
- Provide adequate resources to assist officers to discharge their responsibilities on countering fraud and corruption;
- Receive and consider progress updates at Audit Committee on investigations (as appropriate); and
- In conjunction with the SMT, develop and maintain an anti-fraud culture throughout the organisation.

Chief Executive

The Chief Executive, through Council is responsible for;

- Developing and maintaining effective controls to prevent fraud, bribery or corruption;
- Carrying out vigorous and prompt investigations if suspected fraud, bribery or corruption occurs;
- Taking appropriate legal and/or disciplinary action against managers where management failure has contributed to the commission of the bribery, fraud/corruption.

Directors / Assistant Directors / Heads of Service

Fraud risk is managed through the existence, and application, of appropriate policies and procedures and through the introduction of relevant control systems. These systems are the overall responsibility of Management throughout the Council. Consideration of fraud risks must be an integral part of everyday business decisions, project and change management and overall strategy.

Management has overall responsibility for acknowledging, assessing and managing the individual fraud risks relevant to their service areas. The primary responsibility for preventing fraud lies with management through:

- Identification of risks to which systems and procedures are exposed
- The implementation, documentation and operations of internal controls
- Establishing an environment that promotes compliance with internal controls
- Promoting fraud awareness amongst staff and fostering an 'anti-fraud' culture.

Management is responsible for ensuring that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively. It is generally desirable that:

- Wherever possible, there is a separation of duties so that control of a key function is not vested in one individual;

- Backlogs are not allowed to accumulate; and
- In designing any new system, consideration is given to building in safeguards to prevent and/or detect internal and external fraud.

Management should inform the Assistant Director of Finance & Performance or Chief Executive if they suspect fraud or financial impropriety.

Staff

All Council staff are responsible for:

- Acting with propriety in the use of official resources and the handling and use of public funds in all instances. This includes cash and/or payment systems, receipts and dealing with suppliers;
- Conducting themselves in accordance with the seven principles of public life detailed in the first report of the Nolan Committee 'Standards in Public Life', i.e. selflessness, integrity, objectivity, accountability, openness, honesty and leadership; and
- Being vigilant to the possibility that unusual events or transactions could be indicators of fraud and alerting their Manager where they believe the opportunity for fraud exists.

Staff must assist any investigations by making available all relevant information, by co-operating in interviews and if appropriate provide a witness statement.

Fraud Response Group

The Fraud Response Group is responsible for;

- referring cases, where necessary, to the PSNI for further investigation.
- providing advice and guidance to the Assistant Director of Finance and Performance on the reporting of investigations to Council Committee(s) and next steps in the investigation process, if required.

Assistant Director of Finance and Performance

The Assistant Director of Finance and performance will;

- Offer advice and assistance in relation to cases of fraud or suspected fraud;
- Offer advice or participate in fraud investigations;
- Report as appropriate to the Audit Committee on investigations;
- Share organisational learning with relevant Managers and staff;
- Ensure anti-fraud awareness training is provided as appropriate and, if necessary, more specific anti-fraud training and development is provided to relevant staff;
- Inform the NIAO of all suspected fraud and whistleblowing cases; and
- Coordinate the Council's input into the National Fraud Initiative.

Internal Audit

The responsibility for the development and maintenance of appropriate systems and controls lies with Management. However, Internal Audit can play an important role by assisting in the deterrence and prevention of bribery, fraud and corruption by examining and evaluating the effectiveness of those systems and controls.

Internal audit work will be planned and carried out in such a way that there is a reasonable expectation of detecting fraud or irregularities. At the request of the Chief Executive, Internal Audit may be asked to conduct or participate in an investigation. They may also be asked to make recommendations regarding the nature and extent of investigation considered necessary, if such is to be carried out internally.

Indicators of Fraud

- Missing expenditure vouchers and unavailable official records
- Profitability declining
- Excessive variations to budgets or Contracts
- Refusals to produce files, minutes or other records
- Increased employee absences
- Borrowing from fellow employees
- Covering up inefficiencies
- No supervision
- Staff turnover is excessive
- Figures, trends or results which do not accord with expectations
- Bank reconciliations are not maintained or can't be balanced
- Excessive movement of cash funds
- Multiple cash collection points
- Unauthorised changes to systems or work practices
- Large outstanding bad or doubtful debts
- Employees suffering financial hardships
- Placing undated/post-dated personal cheques in petty cash
- Employees apparently living beyond their means
- Heavy gambling debts
- Signs of drinking or drug abuse problems
- Conflicts of interest
- Lowest tenders or quotes passed over with scant explanations recorded
- Employees with an apparently excessive work situation for their position
- Managers bypassing subordinates
- Subordinates bypassing managers
- Excessive generosity
- Apparent personal problems
- Poor morale
- Excessive control of all records by one Office
- Unusual working hours on a regular basis
- Non taking of leave
- Excessive overtime
- Absence of controls and audit trails
- Altering contract specifications
- Contractor paid for work not done
- Socialising with clients – meals, drinks, holidays
- Favourable treatment of clients – e.g. allocation of work

This list is not exhaustive.

Common Methods and Types of Fraud

- Payment for work not performed
- Forged endorsements
- Abuse of flexi
- Altering amounts and details on documents
- Collusive bidding
- Overcharging
- Writing off recoverable assets or debts
- Unauthorised transactions
- Selling information
- Altering stock records
- Altering sales records
- Cheques made out to false persons
- False persons on payroll
- Working whilst on sick leave
- Theft of official purchasing authorities such as order books
- Unrecorded transactions
- Transactions (expenditure/receipts/deposits) recorded for incorrect sums
- Cash stolen
- Supplies not recorded at all
- False official identification used
- Damaging/destroying documentation
- Using copies of records and receipts
- Using imaging and desktop publishing technology to produce apparent original invoices
- Charging incorrect amounts with amounts stolen
- Transferring amounts between accounts frequently
- Delayed terminations from payroll
- Bribes
- Over claiming expenses
- Fraudulent use of office resources- claiming more time than incurred; use of office time for personal purposes (eg. Inappropriate Internet usage)
- Time recording- claiming more time than incurred
- Skimming odd pence and rounding
- Running a private business with official assets
- Using facsimile signatures
- False compensation and insurance claims
- Stealing of discounts
- Selling waste and scrap

This list is not exhaustive.

Examples of Good Management Practices which may assist in combating fraud

- All income is promptly entered in the accounting records with the immediate endorsement of all cheques
- Regulations governing contracts and the supply of goods and services are properly enforced
- Accounting records provide a reliable basis for the preparation of financial statements
- Controls operate which ensure that errors and irregularities become apparent during the processing of accounting information
- A strong internal audit presence
- Management encourages sound working practices
- All assets are properly recorded and provision is made known or expected losses
- Accounting instructions and financial regulations are available to all staff and are kept up to date
- Effective segregation of duties exists, particularly in financial accounting and cash/securities handling areas
- Close relatives do not work together, particularly in financial, accounting and cash/securities handling areas
- Creation of a climate to promote ethical behaviour
- Act immediately on internal/external auditor's report to rectify control weaknesses
- Review, where possible, the financial risks of employees
- Issue accounts payable promptly and follow-up any non-payments
- Set standards of conduct for suppliers and contractors
- Maintain effective security of physical assets; accountable documents (such as cheque books, order books); information, payment and purchasing systems
- Review large and unusual payments
- Perpetrators should be suspended from duties pending investigation
- Proven perpetrators should be dismissed without a reference and prosecuted
- Query mutilation of cheque stubs or cancelled cheques
- Store cheque stubs in numerical order
- Undertake test checks and institute confirmation procedures
- Develop well defined procedures for reporting fraud, investigating fraud and dealing with perpetrators
- Maintain good physical security of all premises
- Randomly change security locks and rotate shifts at times (if feasible and economical)
- Conduct regular staff appraisals
- Review work practices open to collusion or manipulation
- Develop and routinely review and reset data processing controls
- Regularly review accounting and administrative controls
- Set achievable targets and budgets, and stringently review results
- Ensure staff takes regular leave
- Rotate staff
- Ensure all expenditure is authorised
- Conduct periodic analytical reviews to highlight variations to norms
- Take swift and decisive action on all fraud situations
- Ensure staff are fully aware of their rights and obligations in all matters concerned with fraud

Routemap

The diagram below provides an overview of the relationship between the complaints, fraud and raising concern policies and the grievance procedure. Note that only employees and workers are protected by whistleblowing legislation.

