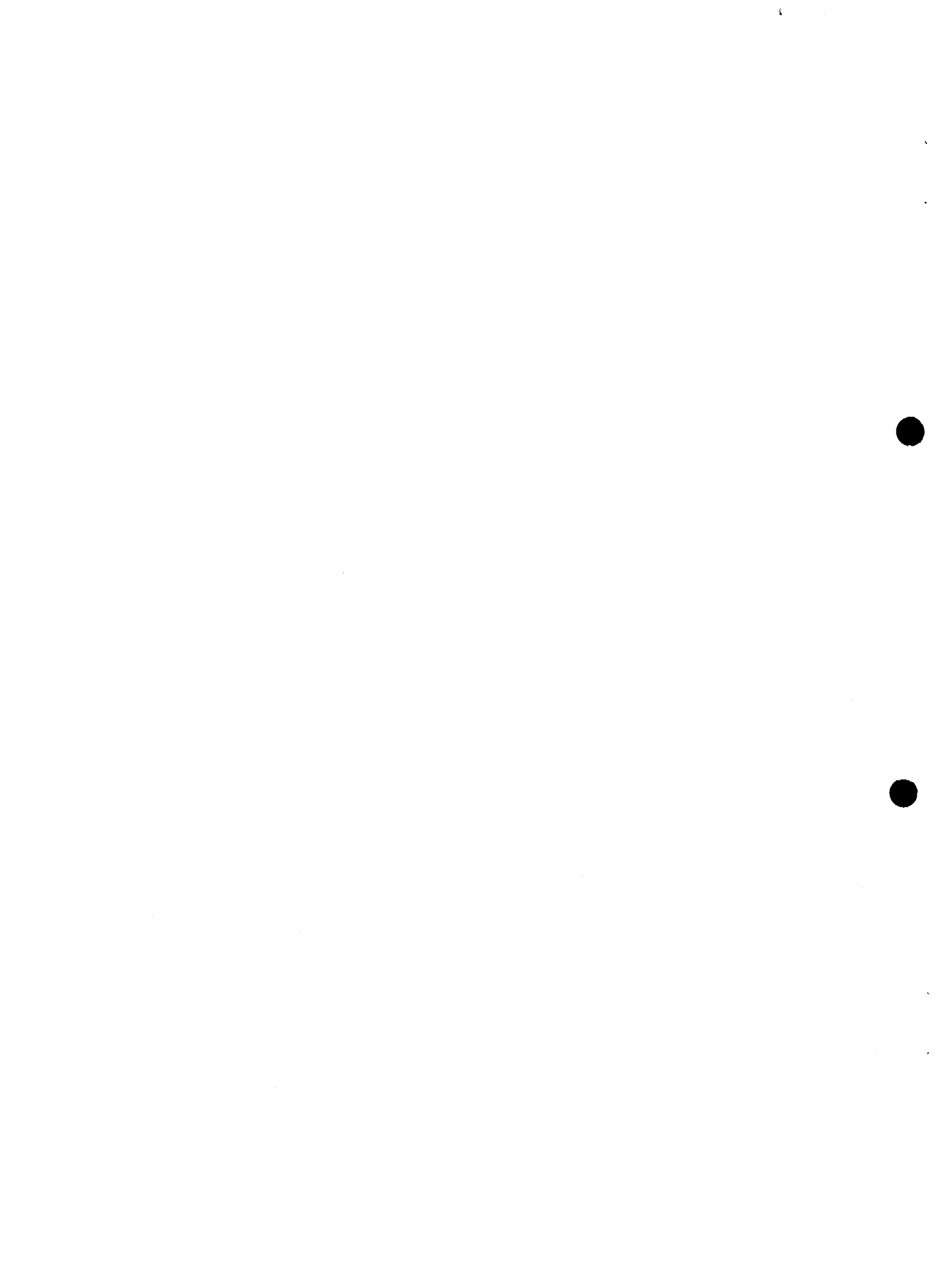




**Anti-Fraud
and
Anti-Corruption
Strategy**

**DRAFT DOCUMENT
FOR
CIRCULATION & DISCUSSION**

23 November 2000



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ANTI-FRAUD AND ANTI-CORRUPTION STRATEGY

1. INTRODUCTION

- 1.1 We (the Council) employ approximately 6,500 staff and have a revenue and capital budget of over £206 million gross. As with other large organisations, the size and nature of our services puts us at risk to loss due to fraud and corruption both from within the council and outside it.
- 1.2 We are committed to making sure that the opportunity for fraud and corruption is reduced to the lowest possible risk, and we will deal with the risks in a firm and controlled manner
- 1.3 An important part of this approach is introducing an anti-fraud and anti-corruption strategy, which we will use to advise and guide members and staff on our approach to the serious issues of fraud and corruption. This document provides an overview of our policy in this matter and includes a 'fraud response plan' which provides more detailed guidance on how to deal with fraud and corruption.
- 1.4 The main message is that we expect all members, employees, consultants, contractors and service users, to be fair and honest, and to give us any help, information and support we need to deal with fraud and corruption.
- 1.5 The strategy set out in this document covers the following areas:
 - Our written rules
 - How we expect our members and employees to behave
 - Preventing fraud and corruption
 - Detecting and investigating fraud and corruption
 - Training

2. OUR WRITTEN RULES

- 2.1 We have a number of procedures and rules to make sure that our financial, working and organisational procedures are properly controlled. These are an important part of our internal control process, and it is important that all members and staff know about them.
- 2.2 The most important of these are as follows:
 - Contract Standing Orders
 - Financial Regulations
 - Code of Conduct for Councillors
 - Code of Conduct for Employees
 - Public Interest Disclosure Procedure ("Whistleblowing" Procedure)

- The Code of Governance for DLO/DSOs
 - Defalcation Procedures
 - Employees' Conditions of Service
 - Scheme of Delegations
- 2.3 Individual departments have also introduced their own measures, which are designed to control their activities. Examples include accounting control procedures, working manuals and operating procedures.
- 2.4 Directors must make sure that all staff have access to these rules and regulations and that staff receive suitable training.
- 2.5 Members and employees must make sure that they have read and understood the rules and regulations that apply to them, and act in line with them.
- 2.6 If anyone breaks these rules and regulations the Council may take formal action against them. In respect of employees this may include terminating their employment with the Council and it will be the responsibility of the relevant manager to investigate and to initiate any such process. In respect of Members, it will be the responsibility of the Monitoring Officer to report matters to the Standards Committee.

3. HOW WE EXPECT COUNCIL MEMBERS AND EMPLOYEES TO BEHAVE

- 3.1 We expect all people and organisations who are in any way associated with us to be honest and fair in their dealings with us and our clients and customers. We expect our members and employees to lead by example in these matters.
- 3.2 Our Codes of Conduct for members and employees set out an approach to work that is both honest and fair. Members and employees must act in line with the codes at all times.
- 3.3 Our Members and employees have an important role in dealing with fraud and corruption and we will encourage our staff and members to inform us if they suspect a case of fraud.
- 3.4 We will deal with all information fairly and as far as possible confidentially. Our fraud response plan attached (Appendix 1) gives more advice on this issue for staff.
- 3.5 The Committee on Standards in Public Life set out seven guiding principles that apply to people who serve the public. A number of our Codes already incorporate these principles (which are attached at Appendix 2) and we will develop our working behaviour around these principles.

- 3.6 We expect our Directors to deal firmly and quickly with anyone who is responsible for fraud or corruption. The Council's Financial and Security Regulations already provide for this and also that the Chief Executive in consultation with the Director of Corporate & Legal Services and the Director of Finance may refer matters to the police if he suspects any criminal activity has been carried out.

4. PREVENTING FRAUD AND CORRUPTION

- 4.1 We believe that if we are to beat fraud and corruption, we must prevent it from happening in the first place. It is essential that we have clear rules and procedures, within which members, employees, consultants and contractors can work. These include the main corporate rules, which are set out in section 2.
- 4.2 We must regularly review and update our written rules.
- 4.3 Directors must make sure that suitable levels of internal check are included in working procedures, particularly financial procedures. 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.
- 4.4 We must follow our procedures when employing new staff. If possible, we must check the previous employment records of anyone we are considering employing. This applies to both temporary and permanent staff.
- 4.5 We are committed to working and co-operating with other organisations to prevent organised fraud and corruption. Wherever possible, we will be prepared to help and exchange information with other Councils and organisations to deal with fraud.
- 4.6 This kind of work needs to be tightly controlled particularly in relation to data protection issues. The Internal Audit Section will control exchanges of information.
- 4.7 We have confidential facilities available for people to give us information that may prevent fraud and corruption. These include a dedicated telephone, which members of the public can use to give us information about specific services.
- 4.8 We will make sure that full details of reporting facilities are widely published to the public, members and employees, and that all information we receive in this way is investigated and dealt with.

5. DETECTING AND INVESTIGATING FRAUD AND CORRUPTION

- 5.1 You should read this section with our fraud response plan (Appendix 1) and our Prosecution Policies (Appendices 4 and 5).
- 5.2 Under our Codes of Conduct and Financial Regulations employees must report any suspected cases of fraud and corruption to the appropriate manager, or, if necessary, direct to the Head of Internal Audit. Reporting cases in this way is essential to the anti-fraud and corruption strategy and makes sure that:

- suspected cases of fraud and corruption are investigated properly;

- The fraud response plan is carried out properly;
 - There is a standard process for dealing with all suspected cases of fraud and corruption; and
 - People and our interests are protected.
- 5.3 In addition, the Council’s Public Interest Disclosure Procedure (“Whistleblowing” Policy) (Appendix 3) is intended to encourage and enable staff to raise serious concerns which may relate to fraud or corruption or other matters. Where matters of fraud are concerned the procedure provides for the Monitoring Officer to refer matters to or involve Internal Audit. Employees reporting concerns in this way are afforded certain rights of protection as set out in the policy.
- 5.4 In relation to matters of fraud or corruption the head of Internal Audit will work with the Monitoring Officer and, where necessary, the Chief Executive to decide on the type and course of the investigation. This may include reporting the matter to the relevant prosecuting authorities. We will carry out our disciplinary procedures where appropriate, but we will ensure that any internal proceedings do not prejudice any criminal investigation.
- 5.5 In cases relating to Housing Benefits and Council tax Fraud the action taken will follow the prosecution policy outlined in Appendix 5. All other instances of fraud the action taken will follow the prosecution policy outlined in Appendix 4.
- 5.6 The Accounts Commission has powers to request or carry out an investigation into fraud and corruption.

6. TRAINING

- 6.1 We understand that the key to introducing a successful anti-fraud and anti-corruption strategy and making sure it continues to apply will depend on programmed training and the way all our employees respond.
- 6.2 We support the provision of training for our employees who are involved in, or managing, internal control systems to make sure that their responsibilities and duties are regularly reviewed and reinforced.
- 6.3 We are also committed to training and developing our employees who are involved in investigating fraud and corruption, and we will provide suitable training.

Appendix 1

Fraud Response Plan





Compiled by Internal Audit

1. INTRODUCTION

- 1.1 Argyll and Bute Council is committed to the highest possible standards of openness, probity and accountability in all affairs. It is determined to develop a culture of honesty and opposition to fraud and corruption.
- 1.2 In line with that commitment, the Council's Anti-Fraud and Anti-Corruption Policy outlines the principles we are committed to in relation to preventing, reporting and managing fraud and corruption.
- 1.2 This Fraud Response Plan reinforces the Council's robust approach by setting out the ways in which employees or members of the public can voice their concerns about suspected fraud or corruption. It also outlines how the Council will deal with such complaints.

2. WHAT DO WE WANT TO KNOW ABOUT?

- 2.1 This Plan is intended to be implemented where suspicions of fraud or corruption have been raised.

Fraud is defined as:

"The intentional distortion of financial statements or other records by persons internal or external to the authority which is carried out to conceal the misappropriation of assets or otherwise for gain".

Corruption is defined as:

"The offering, giving, soliciting or acceptance of an inducement or reward, which may influence the action of any person".

- 2.2 Fraudulent or corrupt acts may include:

Systems Issues	ie, where a process/system exists which is prone to abuse by either employees or public, (eg Housing Allocations)
Financial Issues	ie, where individuals or companies have fraudulently obtained money from, or which properly belongs to, the Council, (eg invalid invoices/work not done, Housing Benefit fraud)
Equipment or Resource Issues	ie, where Council material or equipment is misappropriated or misused other than for Council purposes (eg Council vehicles, computer equipment, building materials).

APPENDIX 2

The Seven Principles of Public Life

Selflessness

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

Integrity

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

Objectivity

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

Accountability

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

Openness

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

Honesty

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

Leadership

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

PUBLIC INTEREST DISCLOSURE POLICY

1. INTRODUCTION

1.1 Argyll & Bute Council is committed to the highest standards of openness, probity and accountability. These high standards are coupled with a positive approach to enabling employees and others who become aware of wrongdoing, improper conduct or other failures of a substantive nature to bring attention to their concerns. The Council's Public Interest Disclosure Policy is, therefore, designed –

- To set out a process for the investigation of certain disclosures of information which are made in the public interest;
- To provide protection from reprisal or victimisation for individuals who make such disclosures in good faith; and
- Thus to provide a genuine recourse for legitimate representations without encouraging a climate in which they become malicious, trivial or routine.

1.2 There are existing procedures in place which enable employees of the Council to raise a grievance relating to their own employment. The Public Interest Disclosure Policy is designed to deal with matters which fall outwith the scope of the Grievance or Disciplinary Procedures

2. SCOPE

2.1 In the context of the work of Argyll & Bute Council, a “qualifying disclosure” means any disclosure of information which, in the reasonable belief of the person making the disclosure, tends to show one or more of the following –

- (a) That a criminal offence has been committed, is being committed or is likely to be committed,
- (b) That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he/she is subject,
- (c) That a person has failed, is failing or is likely to fail to comply with any obligation as to their conduct or otherwise imposed on that person by –
 - The National Code of Local Government Conduct
 - The Argyll & Bute Council Code of Conduct for Members
 - The Argyll & Bute Code of Conduct for Officers

- The Argyll & Bute Council Protocol governing relations between Members and Officers
 - The Council's Standing Orders, Contract Standing Orders, or Financial and Security Regulations.
- (d) That the health or safety of any individual has been, is being or is likely to be endangered.
- (e) That the Council has committed, is committing or is likely to commit to a course of action which is unlawful
- (f) That the Council has taken, is taking, or likely to take a course of action, or there has been a corresponding failure, which is likely to give rise to a finding of maladministration on the part of the Council
- (g) That information tending to show any matter falling within any of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

A qualifying disclosure is made in accordance with this policy if the person –

- (a) Makes the disclosure in good faith
- (b) Reasonably believes that the information disclosed, and any allegation contained in it, are substantially true
- (c) Does not make the disclosure for purposes of personal gain
- (d) In all the circumstances of the matter, believes it is reasonable for the person to make the disclosure.

3. SAFEGUARDS

- 3.1 The Council recognises that taking a decision to report a concern of the type covered by this policy can be a difficult one, not least because of the fear of reprisal. The Council makes it clear that it will not tolerate any reprisals under any circumstances and will take action to protect a person who makes a qualifying disclosure.
- 3.2 If a disclosure is made in good faith but is not confirmed by subsequent investigation, no action will be taken against the person making the disclosure. The Council will, however, protect itself, its Members and Employees against malicious allegations and will take appropriate action against any person who makes such an allegation. The Council will also take such reasonable steps which may be open to it to minimise the impact on any of its Members or Employees of an allegation which is either malicious or unfounded.

- 3.3 Nothing in this Policy means that if a person is already the subject of any action or procedure against them (including in the case of employees, disciplinary procedures) that those procedures will necessarily be halted as a result of a disclosure made under this policy.

4. CONFIDENTIALITY

- 4.1 In a culture of openness, and against the Council's stated policy that it will protect a person who may make a disclosure in good faith and in the public interest, and to assist any investigative process, it is clearly desirable that the person who makes a disclosure should be prepared to do so on an attributable basis. The Council will, however, take reasonable steps, but cannot guarantee, to protect the identity of a person who makes a disclosure and does not wish his or her name to be disclosed, subject to the following factors –
- (a) The seriousness and nature of the issues raised
 - (b) The likelihood of confirming any allegation from other attributable sources
 - (c) The need for evidential statements as part of any investigation
 - (d) The credibility of the allegation, and, in all the circumstances, the need to allow a person against whom an allegation is made to test the veracity and substance of it
 - (e) The likelihood, in all the circumstances, of unwarranted reprisals being directed against a person who makes a disclosure.
- 4.2 The Officer conducting the investigation will, however, take all necessary steps to ensure that the name of a person who makes a disclosure is not disclosed to others within the Council except, strictly, on a need to know basis in order to further the due completion of the investigation and the Council's response to it. (See paragraph 5 below)
- 4.3 The Council will not disclose in any public document the name of any person who makes a disclosure, nor will the Council disclose that person's name to any third party outside the Council except –
- Where an offence may have been committed and there is considered to be an obligation to report that to the Police or Procurator Fiscal, or to co-operate with enquiries instituted by the Police or the Fiscal
 - Otherwise where there would be any failure on the part of the Council to comply with any legal obligation on them.
- 4.4 Allegations expressed anonymously will not normally be considered. In exercising any discretion to consider any anonymous allegation, the factors which will be taken into account are –

- The seriousness and nature of the issues raised
- The credibility of the concerns
- The likelihood of confirming the allegations from other attributable sources

5. DISCLOSURES AND THEIR INVESTIGATION

- 5.1 As noted earlier, this Policy is designed to provide recourse for legitimate representations to be made about wrongdoing, improper conduct or other failure of a substantive nature. Any person making a disclosure in terms of this Policy should do so to the Council's Monitoring Officer. The Monitoring Officer will decide –
- (a) Whether the matter is one which should be dealt with under the Council's Grievance or Disciplinary Procedures, and, if so, will refer the matter to the appropriate Officer.
 - (b) Whether the matter is one which should be dealt with under any Complaints or other procedure of the Council, and, if so, will refer the matter to the appropriate Officer.
 - (c) Whether the matter is one which should be investigated in terms of this Policy and, if so, will conduct an investigation in terms of this Policy.
 - (d) In the absence of an investigation in terms of this Policy, what other action, if any, should be taken.
- 5.2 Notwithstanding and without prejudice to the statutory obligations placed on the Monitoring Officer, for the purposes of this Policy the function of the Monitoring Officer is to investigate a disclosure of information, and any allegation contained in it, relating to any matter contained in paragraph 2 of this Policy.
- 5.3 The purpose of an investigation under this Policy will be to determine which of the following findings is the case –
- (a) That there is no evidence of any failure to comply with any of the matters set out in paragraph 2 above,
 - (b) That no action needs to be taken in respect of the matters which are the subject of the investigation
 - (c) That any matter which is the subject of investigation can be remedied by compliance with any recommendations which are made in the report of the investigation

- (d) That there is evidence of a failure on the part of a Member of the Council in relation to any of the matters referred to in paragraph 2 above in which case, with the exception of a matter in respect of which a criminal offence may have been committed, the report of the investigation will be referred to the Council's Standards Committee which will consider what action, if any, should be taken
- (e) That there is evidence of a failure on the part of an Officer of the Council in relation to any matter referred to in paragraph 2 above, in which case the report of the investigation will be referred to the Chief Executive who will determine what action, if any, should be taken
- (f) That the matters which are the subject of the investigation should be referred to the Council's Standards Committee, otherwise.

5.4

For the purpose of conducting an investigation in terms of this Policy, the Monitoring Officer –

- (a) May conduct the investigation personally, or may authorise another person to do so
- (b) May obtain information from such persons and in such manner, and make such enquiries, as she/he thinks fit
- (c) May require any Officer or Member to provide such information or explanation as may be necessary for the purpose of conducting the investigation
- (d) Must give any person who is the subject of any allegation which is being investigated the opportunity or opportunities to respond to and comment on any allegation and must, in the course of any interview, allow that person to be accompanied by any other person
- (e) May require any Officer or Member holding or accountable for any document or record (held in any medium) relating to the investigation access to such document or record.
- (f) May, to assist the investigation, obtain advice from any person inside or outside the Council who is qualified to give it.

5.5

A copy of any report of any investigation must be given to any Member or Officer of the Council who is the subject of the report before the report is finally disposed of by the Monitoring Officer as set out in paragraph 5.3 above.

6. CONSIDERATION OF REPORTS BY STANDARDS COMMITTEE

6.1 In considering any report brought before it in terms of Paragraph 5.3(d), the Standards Committee will –

- (a) Provide the opportunity for the Member, together with any other person whom the Member wishes to accompany or represent him/her, to appear before the Committee;
- (b) Hear oral or consider written evidence from persons who may have provided evidence in the course of the investigation, and any other witnesses whom either the Member concerned or the Standards Committee consider it desirable to hear or receive evidence from;
- (c) Consider such written documents as may be brought before them, including any so brought by the Member concerned, or any other document which the Committee considers it necessary for them to consider.

The Standards Committee will hold any hearing(s) in private unless the Member concerned requests that it be held in public.

7. DECISIONS AND RECOMMENDATIONS OF STANDARDS COMMITTEE

7.1 The Standards Committee is to decide whether or not there has been a failure on the part of any Member who is the subject of a report in terms of Paragraph 5.3(d), with the exception of a matter in respect of which a criminal offence may have been committed until any criminal proceedings have been disposed of.

7.2 Where the Committee decides that there has been no such failure on the part of any Member of the Council it will give notice to that effect to the Member concerned.

- 7.3 Where the Committee decides that there has been such a failure as is mentioned in Paragraph 7.1 above, the Committee must decide whether the nature of the failure is such that either –
- (a) The Committee is to advise the Member concerned that there has been a failure on his or her part, and specify the details of that failure; or
 - (b) Submit a report to Council, which report will be considered in public, advising that there has been a failure on the part of a Member concerned, specifying the details of that failure, which report may include a recommendation that any one of the following courses of action should be taken by the Council –
 - (i) That a Member concerned be afforded the opportunity of apologising to the Council in respect of the failure; or
 - (ii) That a Member concerned should be the subject of a resolution of censure expressing the Council's disappointment that there has been a failure on the part of a Member concerned; or
 - (iii) That the Council remove a Member concerned from any one or more positions of office to which the Member was appointed by the Council or any of its Committees or Sub-Committees, and/or that the Member be removed from membership of any one or more Committee or Sub-Committee of the Council; or
 - (iv) That the Council passes a resolution that it has no confidence in a Member concerned, and inviting that Member to consider his or her position as a Member of the Council.
- 7.4 Before submitting a recommendation in terms of paragraph 7.3(b) to the Council, the Standards Committee will provide a copy of their report, including any recommendation contained in it, to a Member concerned.
- 7.5 In considering a recommendation in terms of paragraph 7.3(b) the Council will afford an opportunity to a Member concerned to make a statement to the Council, and it will not be open to the Council to pass a resolution which would, in respect of a Member concerned, be more onerous than the course of action recommended by the Standards Committee.



PROSECUTION POLICY

The Council is committed to preventing fraud and corruption and has developed an 'Anti-Fraud and Anti-Corruption Policy' in order to minimise its occurrence.

The Council will constantly monitor its systems and amend procedures as required.

This procedure does not supersede other internal disciplinary codes implemented by the Council and internal offenders (eg Council employees or Councillors) will be liable to general disciplinary procedures as well as prosecution.

General

The Council's policy on fraud is to:

- deter it in the first instance;
- detect it quickly;
- investigate it efficiently; and
- prosecute offenders when appropriate.

In most cases, the Chief Executive in consultation with the appropriate Director, will decide if reporting the matter to the Police is appropriate. In exceptional circumstances the Internal Audit Manager may refer matters to the Police direct without prior consultation with the Chief Executive.

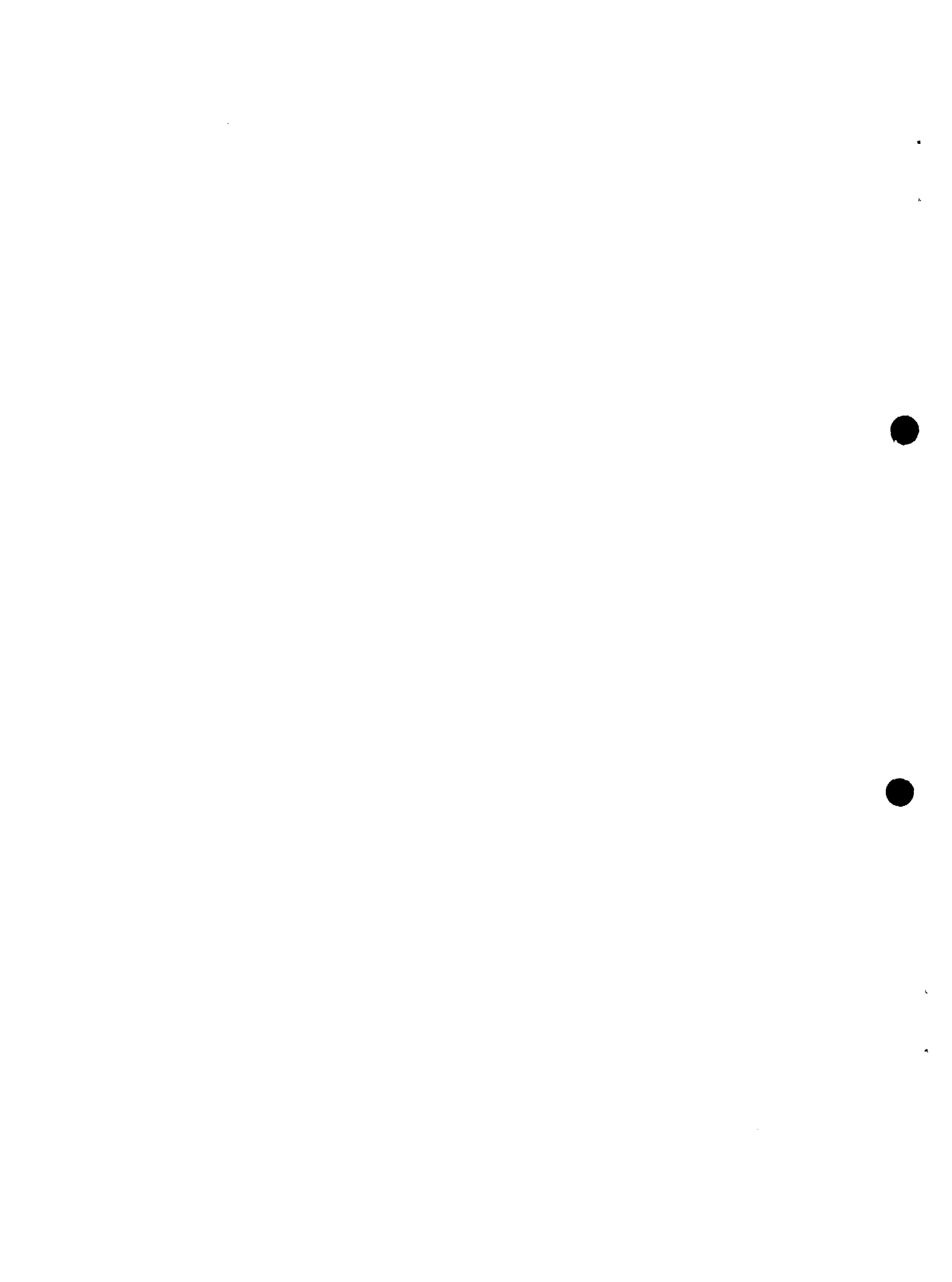
In deciding whether a fraud should be reported to the Police the following factors will be taken in to account.

1. The extent of the fraud/corruption in financial terms
2. The sufficiently and appropriateness of evidence
3. Whether the public interest will be served

In general, all cases will be reported to the Police.

Housing Benefit and Council Tax Benefit Fraud

To assist staff involved in this area, specific procedural guidelines have been established. (See Appendix 5).



APPENDIX 5

HOUSING BENEFIT AND COUNCIL TAX BENEFIT FRAUD

FRAUD DETECTION AND PREVENTION

1. Argyll and Council is fully committed to ensuring that Housing Benefit and or/or Council Tax Benefit is awarded only to those claimants who have an entitlement and that reasonable procedures and processes are in place to verify the circumstances of claimants before making any awards.
2. The Council is committed to developing and implementing measures to prevent and detect benefit fraud.
3. The Council has invested resources in establishing a team of Benefit Fraud Officers dedicated to the identification, investigation and prevention of benefit fraud. That team will work with and, where appropriate under the terms of the Data Protection Act, make use of information available from other agencies such as the Benefits Agency, Department of Social Security, Inland Revenue as well as other departments of the Council to detect and prevent benefit fraud.
4. All Council staff involved in the administration of benefits will periodically be given fraud awareness training with a view to them having a role in the identification of potentially fraudulent claims which must be passed to the team of Benefit Inspectors for investigation.

BENEFIT FRAUD PROSECUTION

5. The Council recognises that the submission of incorrect or incomplete information by an individual or individuals in order to fraudulently obtain benefit is a criminal offence and that consideration will be given to preparing cases for submission to Strathclyde Police or direct to the Procurator Fiscal's Office for prosecution.
6. Where payments of benefit have been considered as having been fraudulently obtained the Benefit Fraud Team Leader will, where the value of the benefit obtained exceeds a threshold level, submit the papers relating to alleged fraud to the Unified Benefits Section for consideration as to whether the case should be referred to Strathclyde Police or direct to the Procurator Fiscal's Office. In considering further action the Benefit Fraud Team Leader will use the following criteria
 - a) Has a good prima facie case been established
 - b) That there is sufficient evidence of false information
 - c) That there is sufficient evidence of criminal intent
 - d) There is a clear record of the investigation:
 - clear reports have been compiled at every stage in the investigation
 - all information provided by the external sources has been recorded in a manner which is acceptable as evidence
 - supporting documentary evidence has been obtained
 - all information has been obtained fairly
 - e) A prosecution would be in public interest because of its deterrent value.

- f) Social factors to be considered include the age and disability of the offender or of a close relative , family circumstances, etc.
- g) Health problems to be considered include any serious/terminal illness or disability of the claimant, partner or other member of the household.
- h) Literacy problems to be considered include, illiteracy, dyslexia, language/learning difficulties.
- h) Also taken into consideration would be any previous offences against the Council.

ADMINISTRATION PENALTIES

- 7. The Council will consider financial penalties, as an alternative to a criminal prosecution, in cases where the criteria for prosecution have been fulfilled but the offender's personal circumstances indicate that a financial penalty would be a suitable solution.
- 8. This provision is in accordance with the Social Security Administration (Fraud) Act 1997 which allows the Authority to administer a penalty (currently 30% of the amount of benefit fraudulently obtained). The Council will recoup the administrative penalty payments in addition to any repayments of the overpaid benefit.
- 9. If the financial penalty is not accepted by the offender as the alternative remedy, then the matter will be referred back by pursuit of a criminal prosecution as will any case where a claimant had agreed to pay an administrative penalty but subsequently fails to keep to the agreement.
- 10. The Benefit Fraud Team Leader with the delegated responsibility for authorising administrative penalties shall be the Unified Benefits Manager.

A FRAUDULENT CLAIM BY AN EMPLOYEE OR MEMBER OF THE COUNCIL

- 11. Any identified case of benefit which involves an Employee of the Council will, in addition to the actions outlined above, also be a subject of the Council's Disciplinary Procedures. In such instances, the case will be brought to the attention of the Internal Audit Manager who may consider whether or not to have his/her section participate in the investigation and disciplinary process.
- 12. Any identified case of fraud which involves a Member of the Council will be referred immediately to the Internal Audit Manager who will arrange for the participation of Internal Audit Section in the investigation. The Internal Audit Manager will then refer the case to the Chief Executive. The Monitoring Officer will refer the matter to the appropriate Committee.

13. It will be the responsibility of the Unified Benefit Manager to advise the Internal Audit Manager immediately it becomes apparent that a fraudulent act may have been committed by an Employee or Member of the Council.

The Council will ensure that all persons who are the subject of an investigation into suspected benefit fraud will be treated fairly and courteously at all times.

