



Anti-Fraud, Bribery / Corruption & Raising Concern Policy

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1	<p>SUMMARY</p> <p>This policy provides a comprehensive framework for staff, workers and the public to report any type of malpractice thereby fostering an open, ethical and accountable culture.</p> <p>It aims to reassure workers that they can raise concerns safely in the workplace without fear of detriment and protect the interests of people who communicates genuine concerns.</p>
2	<p>INTRODUCTION</p> <p>Mid Ulster District Council is committed to achieving high standards of openness, probity and accountability throughout the organisation. In line with that commitment the Council strongly encourages anyone with serious concerns about danger, wrongdoing or illegality in any aspect of Council's operations/processes to come forward and voice their concerns.</p> <p>The Council requires all staff, to always act honestly and with integrity, and to safeguard the public resources for which they are responsible. The Council will not accept any level of fraud or corruption; consequently, any case brought to the Council's attention will be thoroughly assessed and dealt with appropriately.</p> <p>The policy has regard to relevant legislation – Public Interest Disclosure (NI) Order 1198, Fraud Act 2006, Theft Act (NI) 1969, Bribery Act 2010, codes (e.g. Elected Member Codes of Conduct) and guidance issued by the NIAO / CIPFA.</p>
3	<p>AIMS / OBJECTIVES</p> <p>The policy aims to:</p> <ul style="list-style-type: none"> • Promote an open and ethical culture where individuals feel confident to raise serious concerns about wrongdoing without fear of victimisation or reprisals. • Provide clear procedures to report suspected misconduct, illegal acts, fraud, or other unethical conduct at the earliest opportunity. • Ensure concerns are addressed promptly, objectively, and consistently through a proper assessment / investigation process. • Impose appropriate penalties or sanctions where incidents of malpractice or wrongdoing are proven, while also ensuring fairness and proportionality. • Learning from mistakes and implementing improvements to prevent recurrence and drive better outcomes and higher standards of service. • Protecting the public interest by ensuring high standards of accountability and service provision.
4	<p>SCOPE</p> <p>This policy applies to all employees, contractors, agency staff, voluntary workers, consultants, elected members and the public. All workers (employees / contractors) are protected under the Public Interest Disclosure Act 1998 (PIDA), which makes it unlawful for the council to victimise or dismiss a worker for making a protected disclosure in good faith and in the public interest.</p>

5 DEFINITIONS

Whistleblowing / raising concern occurs when someone raises a concern about danger or illegality that affects others and which has a **public interest** dimension to it. The person blowing the whistle is usually not directly, personally affected by the danger or illegality. Consequently, the whistle-blower rarely has a personal interest in the outcome of any investigation into their concerns.

The **Public Interest Disclosure (Northern Ireland) Order 1998 (PIDO)** is the specific legislation that provides legal protection for workers who make such disclosures.

A worker is protected if they have a **reasonable belief** that their disclosure tends to show one or more of the following "relevant failures" have occurred, are occurring, or are likely to occur:

- A **criminal offence** (e.g., fraud or corruption).
- A failure to comply with a **legal obligation**.
- A **miscarriage of justice**.
- The **health or safety** of any individual is, has been, or is likely to be endangered.
- Actual or likely **damage to the environment**.
- The **deliberate concealment** of information relating to any of the above.

Protection applies to workers who have disclosed the information in the correct way. This should be to your employer first, or where you have felt unable to do so, to a prescribed person. Protection applies to any form of detriment from an employer or colleagues, including victimisation, harassment, bullying or dismissal.

Grievances may be defined as concerns, problems or complaints that employees raise with your employers about a range of issues such as:

- Pay/ hours of work or holidays;
- application of the organisation's policies e.g. provision of sick pay;
- new working practices / implications of organisational change;
- health, safety and welfare;
- equal opportunities and discrimination e.g. part time workers; and
- workplace relationships (including harassment and bullying).

Complaints - When someone complains, you are saying that you have personally been poorly treated, for example, through receiving an unsatisfactory level of service, and the complainant is seeking redress or justice for themselves. The person making the complaint, therefore, has a vested interest in the outcome of the complaint and, for this reason, is expected to be able to prove your case.

FRAUD - an intentional deception made for personal gain or to damage another individual. The Fraud Act 2006 provides for a general offence of fraud, with three defined ways of committing fraud. These are:

- **Fraud by false representation** – if a person dishonestly makes a false representation and intends by making the representation to make a gain for himself 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 a person 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 himself or another, or to cause loss to another or expose another to risk of loss; and

- **Fraud by abuse of position** – if a person occupies a position in which he/she is 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 himself or another, or to cause loss to another or to expose another to a risk of loss.

BRIBERY - is 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. 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 provision of tickets to an event (regardless of whether paid for or not). A potential example of bribery could be an individual offering to make a payment to a Council employee in order to secure or keep a contract for the provision of works, goods or services.

The Bribery Act 2010 effective from July 2011 defines four new criminal offences:

- Offering or paying a bribe;
- Requesting or receiving a bribe,
- Bribing a foreign public official; and
- Failure of commercial organisations to prevent bribery by persons associated with them.

CORRUPTION - including all acts demonstrating a lack of integrity, including bribery. Corruption covers matters such as:

- Accepting bribes, gifts or undue hospitality from other parties in return for favourable treatment.
- Failure to follow Council procedures without satisfactory explanation and/or approval regarding quotations and tenders to knowingly benefit a particular supplier, whilst not necessarily corruption per se, represents a breakdown in application of Council procedures and will be investigated as such.

THEFT - dishonestly appropriating the property of another with the intention of permanently depriving them of it (Theft Act (NI) 1969). This may include the removal of misuse of funds, assets or cash.

FALSE ACCOUNTING - dishonestly destroying, concealing or falsifying any account, record of document required for any accounting purpose, with a view to personal gain for another, or with intent to cause loss to another or furnishing information which is or may be misleading, false or deceptive (Theft Act (NI) 1969).

CONSPIRACY TO DEFRAUD – is a common law crime which has been preserved in Statute. It is an offence for two or more persons to agree by dishonesty to embark on a course of conduct which, if the agreement is carried out in accordance with their intentions, will necessarily amount to or involve some third party being deprived of something which is his or to which he is entitled or might be entitled.

MONEY LAUNDERING – while public sector organisations are not normally covered within the list of 'relevant persons' to which the Money Laundering Regulations 2007 apply, as a matter of good practice bodies should consider the risk that their systems and processes are at from being used to launder money. Where there is considered to be a risk of such activity

	bodies should take appropriate actions which may include appointing a money laundering reporting officer and complying with other elements of the Money Laundering Regulations.
6	<p>PREVENTION AND DETECTION</p> <p>There are a number of ways in which the council will seek to prevent wrongdoing example:</p> <ol style="list-style-type: none"> Anti-fraud culture – culture of honesty, integrity and transparency. Policies and procedures e.g. Constitution, Standing Orders, Financial Regulations. Internal controls including Segregation of duties, Organisation chart, Physical security. Corporate governance and ensuring compliance with the Nolan principles; Risk management and fraud risk assessments; Training and awareness of policies and procedures; Raising Concern Champion: Co-operating with other statutory agencies, including the NIAO through the National Fraud Initiative; and Internal / external Audits, data analytics, monitoring and surveillance.
7	<p>HOW TO RAISE CONCERN / SUSPECTED FRAUD / MALPRACTICE</p> <p>Workers should not be dissuaded from reporting suspected fraud, financial impropriety or malpractice. Any action to prevent the reporting or any attempts at intimidation will be treated seriously; the person(s) involved may be subject to disciplinary action.</p> <p>If an allegation is made in good faith, but is not confirmed by the investigation, no action will be taken against the originator. If, however the allegation is demonstrably made for an ulterior 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.</p> <p>If anyone in Council becomes aware of any instance which is not direct fraud against the Council (i.e. Council is not a direct complainant) but where Council services, facilities or documentation has been used by a Third Party in a manner to make false or illegal misrepresentation to a member of the public. In such instances Council may wish to directly express its concern to the PSNI and allow them to decide how this should be progressed.</p> <p>How to raise a concern / suspected fraud via by email, telephone, post or in person to the:</p> <ul style="list-style-type: none"> Internal Audit Manager / Line Manager / Director / HR or Trade Union representative / Elected Member. Raising Concern Champion - catriona.mcgin@midulstercouncil.org or Catriona McGinn, Private & Confidential, Council Offices, Circular Road, Dungannon BT71 6DT. 03000132132. Regulator / Northern Ireland Audit Office. <p>It is important for the worker to state at the time of raising the concern if they wish to raise the matter in confidence so that appropriate arrangements can be made during any investigation.</p> <p>The earlier a concern is raised, the easier it is for the Council to act. Although an individual raising a concern is not expected to prove the truth of an allegation, they will need to demonstrate that there are reasonable grounds for their concern.</p> <p>In addition, individuals considering raising a concern can get confidential, independent advice from the charity, Public Concern at Work.</p>

If an employee is not satisfied with the way in which the concern has been handled or feels that it is appropriate to take the matter further, they should be aware that there are **strict criteria** which must be satisfied for a disclosure to be **protected** under the legislation. Employees are therefore encouraged to seek appropriate advice before taking their concerns to an external party.

Employees can **invite** their trade union (recognised union), or an interpreter if necessary to be present during any meetings or interview in connection with the concerns you have raised. As stated in the relevant legislation, concerns can be raised through your trade union.

Some concerns may be resolved by agreed action without the need for an investigation. If urgent action is required, this will be taken before any investigation is conducted. Within **ten working days** of a concern being raised, the person who received notification of the concern will:

- Acknowledge receipt of the concern;
- Indicate how Council proposes to deal with the matter; and
- Provide information on staff support mechanisms (where appropriate and practicable).

In deciding to take the matter to a **third party** outside the Council, the following are possible contacts:

- the Council's external auditors – NIAO;
- the individual's trade union;
- the PSNI; and
- other relevant bodies prescribed by legislation (<https://www.legislation.gov.uk/nisr/1999/401/schedule/made>) – the Public Concern at Work will be able to advise you who you can contact. If you raise concerns **outside** the Council, you should ensure that it is to one of the prescribed contacts.

A public disclosure to anyone else could take you outside the protection of the Order and of this policy.

How Council will respond

The Council will respond to individuals raising concerns, but it is important for individuals who may wish to raise a concern, to be aware that, in investigating a concern that has been raised, the Council is not initially accepting or rejecting the concern as a matter requiring action. The action taken by Council will depend on the nature of the concern. The Council could decide that the matter raised may require:

- No action and provide rationale for same;
- Investigation by a team of Senior Officers (if fraud is suspected, the Council will consider deploying a Fraud Response Team);
- Referral it to the PSNI;
- Referral it to the Local Government Auditor; or
- Engagement of such independent adviser(s) or support as it deems appropriate.

After the concern is raised, the amount of **contact** between the individual who raises a concern and the officer(s) investigating the issue will depend on the nature of the concern raised, the potential issues involved and the clarity of the information provided initially.

The Council will do what it lawfully can to **support** and minimise any difficulties that workers may experience as a result of raising a concern. For instance, if you are required to give

	<p>evidence in criminal or disciplinary proceedings, the Council will advise about the procedure. The Council accepts that the individual raising the concern is likely to want to be assured that the matter has been properly addressed. Thus, subject to relevant legal and any other relevant constraints, the Council will attempt to provide relevant information about the outcome of any investigations.</p> <p>The decision to inform the PSNI will ordinarily not be taken unless the Chair of the AC has been consulted.</p> <p>If an allegation leads to the investigation of the conduct of any Council Officer(s), that aspect of the investigation will be conducted in accordance with the Council's Disciplinary Procedures.</p> <p>All investigations will be conducted as a matter of urgency with a report of the matter and its findings being submitted initially to the CEO / Chair of the AC (as appropriate). If fraud is attempted, suspected or proven it will be reported to the NIAO and the Department for Communities and any other key stakeholders (if required).</p>	
8	Roles & responsibilities	
Members	<p>Act in the public interest, protect public funds and foster a culture of honesty and integrity with zero tolerance for fraud / wrongdoing.</p> <p>Ensure the public interest is served and that the concerns are heard and addressed at the appropriate level in Council.</p>	
CEO	<p>Full responsibility and accountable for establishing and maintaining a sound system of internal control, including the prevention, detection, and handling of wrongdoing and is crucial in creating a culture where workers feel safe to raise concerns (whistleblowing).</p> <p>Role is paramount in fostering a culture of openness, integrity and accountability.</p>	
Strategic / Assistant Directors (SD)/(AD)/ Head of Services (HoS)/ Managers	<p>Management have direct responsibility within their area of responsibility for operational direction, oversight and reporting of wrongdoing through:</p> <ul style="list-style-type: none"> • Implementation, documentation, operation of adequate internal controls; • Effective identification and management of risks; • Fostering an open culture and lead by good example; • Receiving / acting upon concerns followed by any lessons learnt; • Providing training / awareness on policies / procedures; • Support and direct anyone raising a concern and ensure equitable and fair treatment for all concerned. 	
Staff / Workers	<p>All staff must have, and be seen to have, the highest ethical and personal standards and be honest and objective in their work. Staff will often be the first to notice the potential for wrongdoings and should escalate any suspicions involving staff, contractors, suppliers and users. All staff should:</p> <ul style="list-style-type: none"> • Be aware of fraud / bribery / corruption / malpractice; • Be alert to the potential for fraud or misconduct / negligence; • Escalate their concerns if they suspect issues; • Act in accordance with the 7 Nolan principles of public life - selflessness, integrity, objectivity, accountability, openness, honesty and leadership; • Assist in the investigation of suspected fraud; • Maintain confidentiality in all circumstances, except where required; 	

		<ul style="list-style-type: none"> • Avoid discussing their suspicions with anyone other than the relevant Manager / Investigator(s). Under no circumstances should anyone attempt to investigate any matter on their own. • Care should be taken, by anyone who suspects fraud, to record and retain any evidence (where possible) and make an immediate note of the issues and concerns. Clearly record all activities witnessed or information received or what led to the suspicion.
	Internal Audit Manager (IAM) / Raising Concern Champion	<p>IAM (nominee) plays an important role in fostering a culture of openness and ensuring that genuine concerns about fraud, malpractice, or wrongdoing are handled correctly and without fear of reprisal.</p> <p>Provide a safe, confidential space for individuals to discuss concerns and signpost support throughout the process.</p> <p>Carry out an initial assessment (or source specialist services if required) in strictest confidence in order to establish what action is required to be taken and the results reported to the relevant channels.</p> <p>Main point of contact with the PSNI.</p>
	Audit Committee (AC)	<p>Provides independent oversight and scrutiny of the risk management framework, control environment, and anti-fraud/corruption arrangements.</p> <p>Reviews internal/external audit reports and monitors actions.</p> <p>Oversight and approval of relevant policies and oversee effectiveness and receive assurance that concerns are handled correctly.</p>
9	LINKAGE TO CORPORATE PLAN	
	<p>The policy contributes towards the delivery of corporate value Honest and Trustworthy – we will be open and accountable in developing our plans and delivering services as set out within Mid Ulster District Council's Corporate Plan 2024- 2028. This policy contributes to the transaction of corporate business of Council and will have a positive impact on the Council's strategic themes.</p>	
10	IMPACT ASSESSMENT	
	<p>Equality Screening / Rural Needs Assessment and Impact – A completed Screening Questionnaire has been completed.</p> <p>Staff and Financial Resources - There will be no impact on staff and financial resources as a result of this Policy.</p>	
11	SUPPORT AND ADVICE	
	<p>Support & Advice - Advice and guidance on how matters of concern may be pursued can be obtained from the SD, IAM and HR.</p> <p>Risk Management - Failure to effectively implement this Policy increases the risk of the Council not achieving the highest possible standards in terms of openness, probity and accountability. This Policy will be monitored regularly to ensure that it is being implemented.</p>	

12	<p>COMMUNICATION</p> <p>All Elected Members, Council workers/employees, agency staff and consultants will have access to a copy of this Policy. Staff will be advised if further information is required to relation to the Policy to contact the IAM for advice and guidance. In addition to this training will be organised for staff.</p>
13	<p>CONFIDENTIALITY AND ANONYMITY</p> <p>The Council encourages individuals to raise concerns openly but appreciates they may wish to raise it confidentially in some cases. The Council will do its best to protect an individual's identity. In some circumstances however, an identity may need to be disclosed as part of an investigation or where legally required by the police. The Council will ensure if this is the case it will only be to those who need to know and the individual will be informed about it.</p> <p>Individuals should be assured that the council will focus on the message not the messenger and anyone with a genuine concern has no reason to fear identifying themselves. If we know who you are we can find out more information but more importantly, we can help to ensure your wellbeing and provide you with contacts for additional support. Anonymous concerns however will still be looked into, as far as reasonably possible, based on the information provided.</p>
14	<p>DATA PROTECTION</p> <p>In certain circumstances during the course of investigating a complaint we may share information e.g. PSNI. This will usually only occur if it is believed that some form of a criminal offence has been committed or possible systemic issue across other Councils.</p> <p>A common basis for sharing information with other public authorities is "substantial public interest," particularly if the concerns relate to safeguarding, public safety, or preventing fraud or serious crime.</p>
15	<p>EMPLOYEE RIGHTS</p> <p>It is important in any investigation that enquiries are conducted in accordance with relevant laws and regulations. Employees have statutory rights, which if infringed, may impact on the potential for future disciplinary action and/or criminal prosecution.</p> <p>It is essential, therefore, that any interviews with employees are undertaken strictly in accordance with Council policy and with due regard to the potential need for the interviews to be carried out under caution.</p> <p>Officers conducting such enquiries must first satisfy themselves that they are aware of all protocols and procedures relevant to proper conduct of investigations and subsequently adhere to these protocols and procedures.</p> <p>The policy is designed to ensure that the process is fair, managed professionally and that those who are the subject of the concern are not unfairly or negatively treated and are also supported. The primary protection for the accused is the legal requirement that the wrongdoing must be in the public interest to qualify as a protected disclosure.</p>

16	<p>COMMUNICATING OUTCOMES</p> <p>Reports on the results of investigations will be considered by the Senior Executive Team (where applicable). The summary reports and implementation of all recommendations shall be reported to the AC.</p> <p>The individual raising the concern receives acknowledgment of receipt of the concern, and who will perform the initial assessment with an indication of how the matter will be dealt with, and a general update (e.g., "action taken" or "concern not upheld"), but not specific confidential details.</p> <p>From 01 April 2016, local government bodies should report a fraud proven or suspected including attempting fraud to prescribed stakeholders using an official form 'Initial Notification of Frauds to the Local Government Auditor'.</p> <p>The prescribed stakeholders are as follows:</p> <ul style="list-style-type: none"> • The Local Government Auditor; and • Department for Communities. <p>The Internal Audit Manager will maintain a log of concerns and will present an update on an annual basis.</p>
17	<p>MONITORING AND REVIEW ARRANGEMENTS</p> <p>This Policy will be kept under review and reviewed 4 years from its effective date.</p>

APPENDICES 1– Informal / Formal stage of reporting a concern / fraud

Raising a concern is a mechanism within the overall anti-fraud framework. The two processes share some stages. Below is a table mapping out the typical key stages:

Stage	Raising a Concern (Whistleblowing)	Fraud
Purpose/ Scope	To provide a safe and confidential avenue for workers to report a broad range of wrongdoing, risk, or malpractice (e.g., health & safety, illegality, abuse, financial malpractice) in the public interest.	To establish a framework for managing the specific risk of financial fraud, bribery, & corruption, including prevention, detection and investigation.
Detection / Reporting	Public / worker raises concerns verbally or in writing to Line Manager, Raising Concern Champion (RCC) or HR representative. Can be confidential or anonymous.	Suspicious of fraud / bribery / corruption are reported to different channels e.g. Line Manager, Internal Audit Manger (RCC), HR. Fraudulent activity is suspected, often via tip-off, audit or data analysis.
Initial Assessment	The designated person listens, offers support, and decides if it falls under the Raising Concern policy or other policy and can consult with IAM / HR. The focus is on the public interest, if made in good faith and if an investigation is required.	An initial assessment is performed. Initial steps involve securing evidence, assessing the immediate risk/loss, and determining next steps.
Investigation	The investigation process will determine the facts of the concern. The focus is on addressing the wrongdoing and improving practices. Appropriate follow-up action is taken based on investigation findings, which could involve disciplinary action, process improvements, or referral to external authorities.	A formal, structured investigation aims to gather evidence for potential disciplinary, civil, and/or criminal action. The clear objective is to prove or disprove the fraud, quantify losses, and identify the source of harm.
Outcome & Feedback	The individual raising the concern receives acknowledgment of receipt of the concern, and who will perform the initial assessment with an indication of how the matter will be dealt with, and a general update (e.g., "action taken" or "concern not upheld"), but not specific confidential details.	Outcomes include sanctions (e.g., dismissal, prosecution), maximising recovery of losses, and implementing lessons learned to improve controls.
Protection	Strong emphasis on protecting the individual from detriment or victimisation under Public Interest Disclosure legislation.	Focuses on sanctions for the perpetrator and protection of the organisation's assets and reputation.
Policy Driver	Promoting an open and accountable culture where workers feel safe to speak up without fear of repercussions.	Risk management, prevention, and deterrence of financial crime.

Informal Stage - notification of potential/alleged wrongdoing

On notification of a potential/alleged fraud, the recipient of the notification will refer the matter to the “appropriate individual”.

Although it is anticipated that the “appropriate individual” will generally be the SD, who will, in conjunction with the IAM, carry out and document an initial assessment which will seek to establish the basic facts in relation to the matter, the appropriate individual may, depending on the nature and substance of the potential/alleged fraud, be the CEO or the Chair of the Audit Committee (If it is considered that the potential/alleged fraud could involve the CEO).

If it is alleged that the SD / IAM may or could be implicated in the potential/alleged fraud, the recipient should refer the matter to the CEO / Chair of the AC.

In circumstances where the matter is referred to the Chair of the AC, the Chair will consider the matter and may, with or without consultation with the AC, consult with such officer(s) of the Council that they deem appropriate, such as the Council Solicitor and/or a member of the Senior Executive Team prior to nominating an appropriate person(s) (the CEO’s nominee) to conduct an independent assessment.

The initial documented assessment should, except in exceptional circumstances, be completed and the findings reported to the CEO (or the Chair of the AC) within 10 working days.

After the initial assessment, if the SD and the IAM (or the CEO’s nominees, where applicable) feel that the case does not constitute fraud or financial impropriety, no further action is required.

If, on assessment, it is found that there may be a case to be answered, immediate steps should be taken to safeguard any evidence and prevent any further losses, without compromising the quality of evidence or alerting the fraudster(s) and all records.

Formal Stage

After the initial assessment, the SD and the IAM (or the CEO’s nominee, where applicable) feel that the case does or could constitute wrongdoing, fraud or financial impropriety, the outcome of the assessment will, following review by the CEO and / or the Chair of the AC (depending on the complexity of the issue), be referred for further investigation to either:

- A Fraud Response Team - FRT (if suspected fraud);
- The IAM (unless potentially implicated in the alleged fraud);
- An external specialist; or
- The PSNI

The decision to inform the PSNI should ordinarily not be taken unless the Chair of the AC has been consulted.

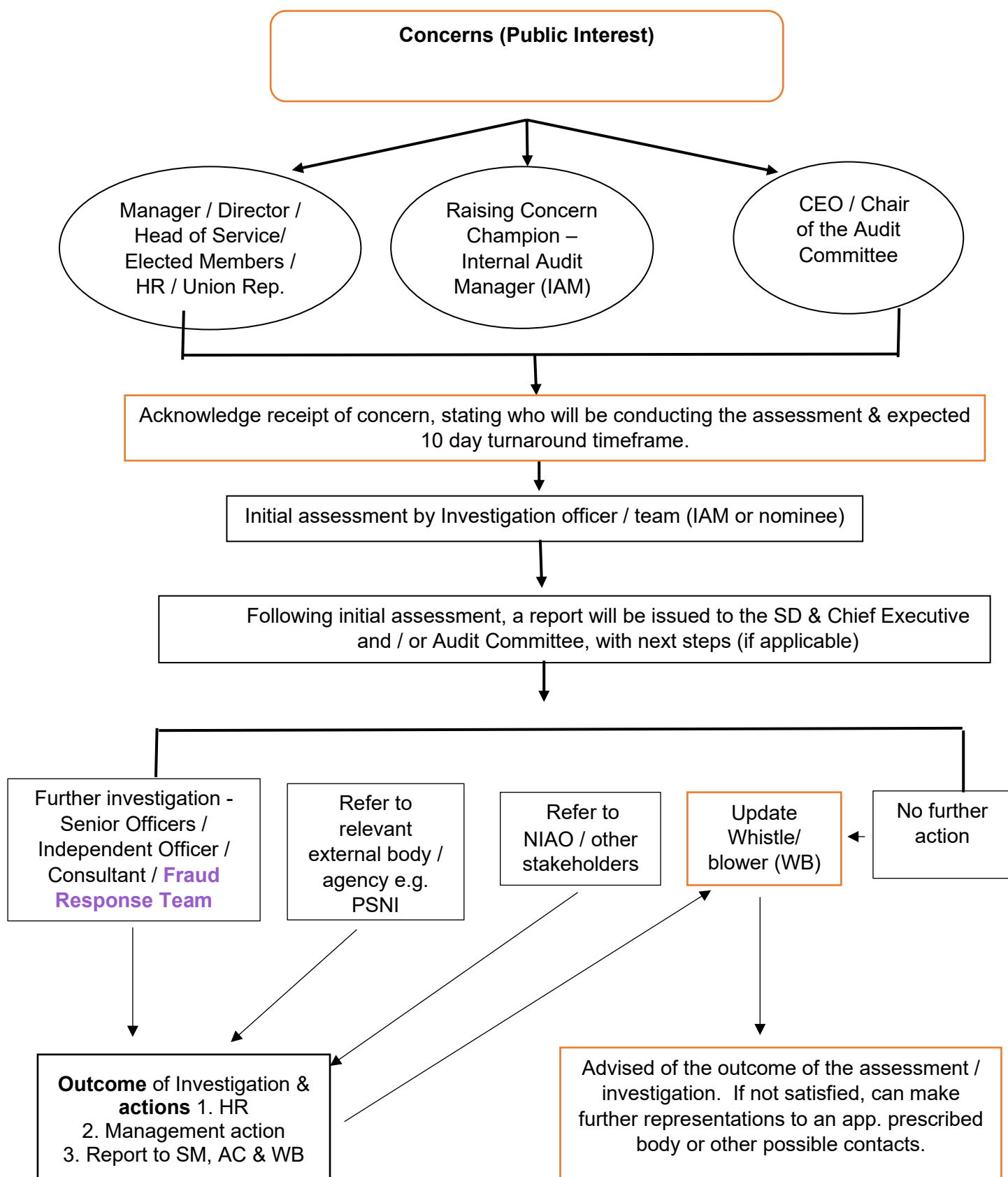
If an allegation of potential/alleged fraud leads to the investigation of the conduct of any Council Officer(s), that aspect of the investigation will be conducted in accordance with the Council’s Disciplinary Procedures.

The Fraud Response Team (FRT) generally consist of the SD, Council Solicitor, a representative from Human Resources and the Assistant Director / Head of Service from the Directorate involved. The FRT should not include any Council management or staff where any conflict of interest (actual or perceived) exists and to deal firmly and quickly with the allegations.

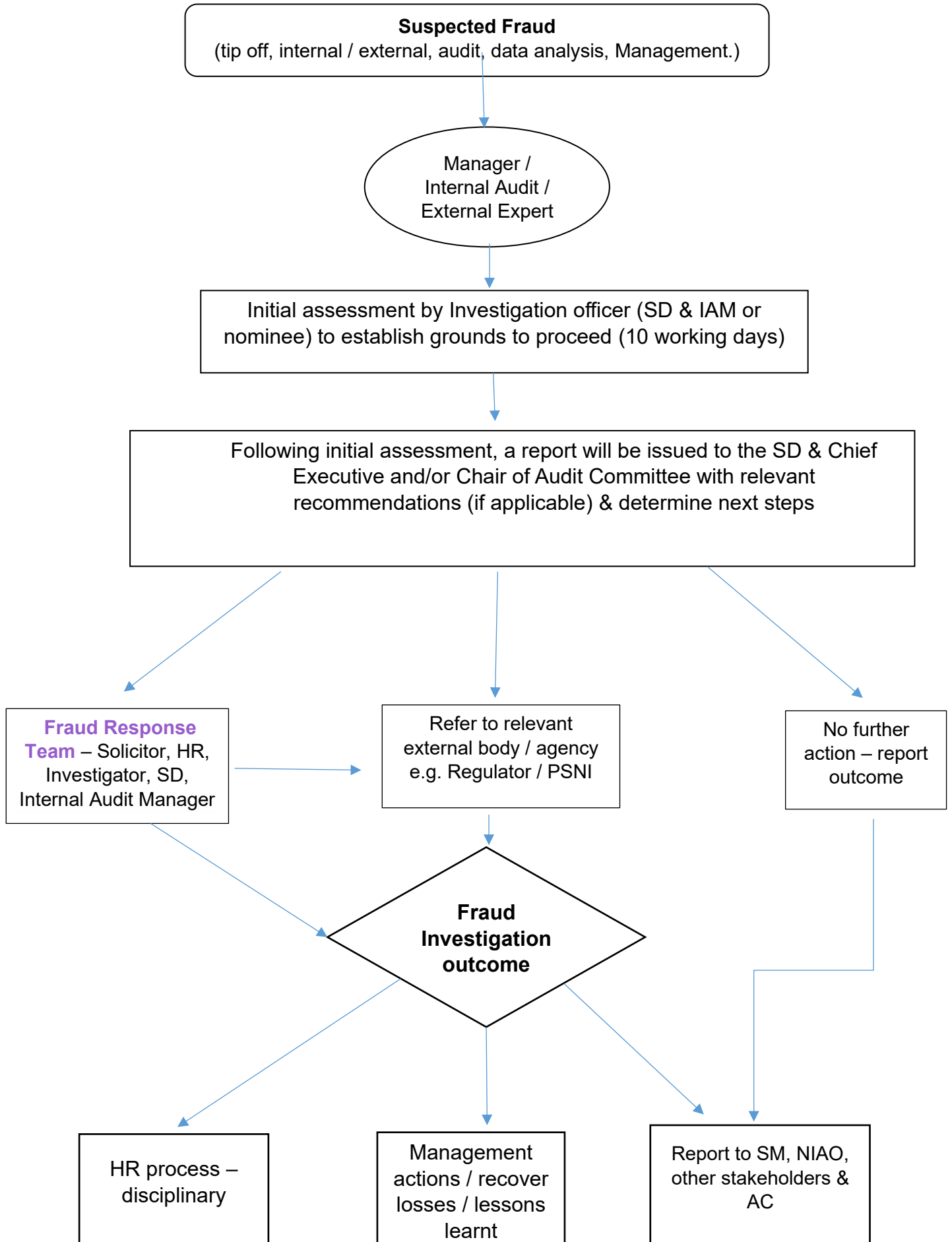
All investigations should be conducted as a matter of urgency with a report of the matter and its findings being submitted initially to the CEO and/or Chair of the AC, prior to formal reporting to the AC and the Local Government Auditor.

The Senior Executive Team will be advised of the outcome of the investigations with appropriate regard being had to any relevant protocols in relation to communicating fraud and other such matters to relevant stakeholders, including the Department for Communities, the NIAO and any other relevant Funded Body.

Appendix 2 – Raising concern process map



Appendix 3 - Fraud Process Map



Appendix 4 – EXAMPLES OF FRAUD

The (not exhaustive) list of different kinds of fraudulent activities:

- **Cash Handling**
 - Theft;
 - Income received not brought into account;
 - Illegal transfer or diversion of money;
 - Changes and additions to payee details through BACS;
 - Accounting records are falsified or amended to allow unauthorised payments;
 - Invoices are falsified or duplicated in order to generate false payment;
 - Supplier bank account details are changed in order to divert payments; and
 - Unauthorised use of cheques and payable orders.

- **Payroll / Travel & Subsistence**
 - Creating fictitious employees who pay is then obtained by the fraudster or by someone in collusion, or obtaining pay that is not consistent with the grade;
 - Making false claims for allowances, travel and subsistence; and
 - Misuse of corporate credit cards.

- **Grant Payments**
 - Grant funds are misappropriated.

- **Contracting**
 - A contractor could be selected as a result of favouritism or who does not offer best value for money; and
 - Payments made for work not carried out as a result of collusion between contractor and employee.

- **Purchasing**
 - Unauthorised use of purchasing systems in order to misappropriate goods or use services for personal gain;
 - Short deliveries of goods or services;
 - Acceptance of unsolicited goods or expanded orders as a result of fraudulent acceptance of attractions such as free gifts; and
 - Orders placed on the internet are not delivered or goods received are not of the desired quality.

- **Assets**
 - Theft or unauthorised use of assets.

- **Information / ICT**
 - Theft of sensitive / restricted documentation or information.
 - Cyber attacks / phishing emails etc.

- **Money Laundering**
 - Individuals or groups pass money transactions through organisational systems.