



Fraud Bribery & Corruption Report

July 2023 D/Supt Jill Fowler

Head of Professional Standards

Joint Audit & Standards Committee

Fraud, Bribery & Corruption **Assurance**

Scope

This report seeks to detail how the JASC can achieve assurance that fraud, bribery and corruption is being appropriately managed within Warwickshire Police.

Policy

- 1.1 Is there a chief officer who is accountable for counter fraud, bribery and corruption?

DCC Franklin-Smith - as delegated Appropriate Authority (by the Chief Constable)

- 1.2 Is there a counter fraud, bribery and corruption policy and is it communicated to staff as part of a wider awareness and training process?

There are a number of policies which relate to fraud prevention and anti-corruption. Business Interests, Notifiable Associations and Gifts/Hospitality have been presented to JASC previously and combine to address potential fraud and corruption misconduct.

All new starters to the organisation receive an input directly from the Head of PSD. Student officers (and Special Constables) receive a 3 hour input around the Standards of Professional Behaviour which cover all of the above aspects of conduct and include:

Notifiable Associations – associates through family/friends exposing officers to potential vulnerability to corruption or reputational concerns

Business Interests – all vetted by Head of PSD to ensure no conflict of interests

Gifts and Hospitality – again all vetted by Head of PSD ensuring all officers are aware of the positive requirement to declare all gifts and offers of hospitality to promote transparency and prevent vulnerability to bribery/corruption.

Training is delivered by the Head of PSD to student officers during their first week of training and another shorter input prior to the conclusion of initial training and going to Patrol, emphasising the importance placed on standards of behaviour. Case studies are used to highlight outcomes for breaching standards of professional behaviour.

All non-warranted staff (new starters) receive a face-to-face briefing during their induction from the Head of PSD.

All staff are required to read policies relating to these areas of behaviour during the annual integrity health check which requires signing to acknowledge an understanding of policies covering these areas of behaviour.

- 1.3 Has a fraud, bribery and corruption risk assessment been carried out and is it integrated within the wider risk management process?

There is a risk assessment grading matrix attached to the Notifiable Association requirement enabling the ACU lead to grade the risk of harm to

the officer/staff member in respect of known/declared associations.

The People Intelligence Board gathers intelligence on officers and staff believed to be at risk of corruption/bribery and also operates within a grading system to enable scarce resources to be used effectively to target those officers/staff who pose a risk to the reputation of organisation, or to themselves/others. This is shared with Ch Supts for monitoring and intelligence gathering to promote accountability and assess whether any misconduct is identified.

Reporting is encouraged through the Professional Standards reporting routes including protected disclosures (so called 'whistle-blowers') and integrity lines. The Anti-Corruption Unit complete routine checks on the highest overtime earners and users of the Force issued mobile devices. High users are identified and further scrutiny applied to ensure Police Systems are not being targeted/used for unlawful purposes.

There are a number of other checks completed with regard to intelligence received from colleagues or members

of the public which highlight concerns relating to fraud/bribery/corruption including

Misconduct history

Email

Phone Usage

Athena

Address search

PNC

STORM

Radio Location

Body Worn Video

All Police systems checks and audits, radio/location audit checks and excessive contact with individuals are scrutinised where potential misconduct is identified. This extends to high overtime claims and expenses audits.

- 2.1 Are there documented procedures for staff, contractors and members of the public to report and record suspicions of fraud, bribery and corruption?

All staff members are encouraged to report suspicious activity either directly to PSD (via e-mail) on our new referral form, via the Integrity Line, via ACU email or direct to staff in ACU. Partners have been briefed on Operation Amethyst which encourages reporting by members of the public of officers exposing themselves or others to risk of harm/bribery/corruption. This could be either by anonymous referral (promotion of Crimestoppers route) or internal reporting. Warwickshire Police subscribes to the internal Integrity Line (facilitated by Crimestoppers) at an additional annual cost to the organisation which encourages PSD reporting.

The National Crime Agency also has a direct route to ACU in order to pass on any official Suspicious Activity Reports identified by banks and other financial institutions as being linked to officers and staff.

2.2 Are these incorporated within routine KPI/metrics?

A national risk assessment tool is used to measure level of risk known as MORILE. It is used to score and monitor all operations/investigations for local and national tracking and monitoring. All records of theft and fraud are MORILE scored on an annual basis to help identify strategic priorities. This category was included in Warwickshire Police's top three priorities during the Financial Year 21/22.

2.3 Are there methods for ensuring that allegations are recorded in a way that investigations can be collated and analysed for trends?

PSD operates a standalone intelligence system and case management system (Optio) which collates all necessary data to identify trends. In July 2023 the Force will be implementing Lawful Business Monitoring which will provide a rich new data source to identify

which systems are accessed by officers, how often and for what purpose. This system allows employee activity checks every 5 seconds and collates all data for investigative purposes. The implementation of LBM is a significant tool to audit system use across all applications of individual officers and staff.

2.4 Are financial losses and recoveries recorded and reported?

The Finance team work with a system called iTrent in order to process overtime and expenses claims. Each month the top 20 overtime claims are identified and scrutinised at Workforce Development Group (WDG) for any excessive claims/anomalies. The list is also sent to ACU for scrutiny and any trends/patterns are further scrutinised. The financial claims are assessed alongside the actual number of hours claimed to ensure consistency. Staff now have to add a supervisor name to claims to show authorisation for claims.

Where potential issues are identified either the finance team or ACU will

consider making a direct contact with the officer to rectify/recover mistakes. Where potential corruption is identified ACU will link in with the Economic Crime Unit (ECU) to conduct combined investigations.

The ACU has no independently accredited financial investigators as this is not a cost-effective use of resource. The training is protracted and requires both tutoring and completion of a portfolio which would entail staff from ACU being abstracted to ECU for prolonged periods. The Force is small enough to combine resources where appropriate to respond to any potential misconduct or criminality which is linked to financial loss.

- 3.1 Is there a response process for reacting to reports of potential instances of fraud, bribery and corruption?

The Force is at the point of implementation of a business monitoring system known as LBM. Staff in ACU will be trained to interrogate and respond to any potential misconduct/criminality identified through lawful business monitoring. This alongside the strict adherence to recording of Business

Interests, Notifiable Associations, Gifts and Hospitality will provide a response process for both proactively identifying potential corruption, and by subscribing to the national Crimestoppers Integrity Line encourage reporting either anonymously or overtly via other reporting mechanisms.

- 3.2 Are there nominated and trained investigators that meet agreed public sector standards and are they able to operate autonomously when investigating their colleagues?

The Force has appropriately trained investigators with accreditation to meet the required standard. As described above there is no dedicated ECU investigator within the ACU, however a combined approach where staff are indoctrinated to support any internal corruption investigation has been implemented successfully in previous operations. The Head of PSD has discussed sharing of resource where appropriate with ECU supervision. This co-investigation is acceptable

practice where staff sign a confidentiality clause.

- 3.3 Are any current officers who are still working under investigation for such allegations?

We currently have 4 fraud cases which are either in scope or under investigation with all individuals still working. None of these are believed to be linked to bribery or corruption.

**D/Supt Jill Fowler
Head of PSD**