

FRAUD, BRIBERY AND CORRUPTION RESPONSE PLAN

Stage 1 – Commencing an investigation
<p>Decisions to proceed with an investigation will be made by the appropriate director in conjunction with the chief internal auditor, and the chief finance officer. At this point the above officers will need to assess whether there is a requirement for any INTERNAL employee to be suspended.</p>
Stage 2 – Appointment of investigating officers
<p>For each investigation, the first step will be to appoint an investigating officer.</p> <p>The chief internal auditor may appoint a lead officer from Internal Audit and decide on the overall lead for the investigation (depending on its nature/significance).</p>
Stage 3 – Planning the investigation
<p>The investigating officer will need to liaise with the internal audit lead officer to ensure that a plan of action is drawn up. The internal audit officers will as a matter of priority ensure that all relevant evidence including documentary records pertaining to the investigation are immediately secured.</p>
Stage 4 – Referral to police
<p>If the investigation relates to a suspected criminal offence, the chief internal auditor will need to consider (in conjunction with the relevant member of management board and the chief finance officer) whether to inform the police. If they decide that a formal police investigation is necessary then liaison with the police will normally be via legal and the chief internal auditor.</p>
Stage 5 – Gathering evidence
<p>The investigating officer will ensure, in conjunction with the internal audit lead officer that all evidence of fraud or corruption relating to the investigation is gathered objectively, systematically and in a well-documented manner. Where this is being carried out in conjunction with a police investigation the internal audit lead officer will be responsible for preparing any required statement and assembling all evidence and exhibits. The internal audit lead officer will keep the investigating officer fully informed of all developments with any police investigation.</p>
Stage 6 – Progress reviews
<p>During the course of the investigation, the internal audit lead officer will produce confidential interim reports (which can be verbal reports) on progress and findings. These will normally be to the investigating officer.</p>
Stage 7 – Conclude investigation and improve system controls

The internal audit lead officer will produce a final report that may be used by management as a basis for disciplinary action, where necessary, in liaison with HR or termination of a contractor's contract where necessary in liaison with legal.

An issues report will identify any system weaknesses that enabled the fraud to occur and make recommendations for improvements. Managers are expected to take prompt action to implement recommendations.

The chief internal auditor will inform the external auditor as agreed in the joint working protocol.

Stage 8 – Recovering losses

The investigating officer will ensure that all opportunities are followed to obtain compensation for any losses to the council including insurance, voluntary restitution or by compensation claims.

Stage 9 – Release of information

Press Release

The decision to issue press statements about fraud or corruption cases that have been investigated and proven by the council will be made by the investigating officer, chief internal auditor and monitoring officer together with the chief executive. They will take account of, on a case by case basis, any sensitive and legal issues involved and the need for confidentiality.

Reporting to Audit and Governance Committee

The Audit and Governance Committee will be informed by the chief internal auditor if Internal Audit are requested to complete an investigation as part of the internal audit quarterly update to the committee. The chief finance officer, monitoring officer and chief internal auditor will consider on a case by case basis taking into account any sensitive and legal issues involved and the need for confidentiality the level of the information provided to the committee by the chief internal auditor.