

OFFICIAL

Fraud Response Plan

1. Why we have a Fraud Response Plan

- 1.1 Reports in the media suggest fraud is on the increase although fraud is not usually an everyday occurrence and most people are surprised to discover a potential fraud issue. Knowing what to do and taking the right steps when the fraud is discovered allows us to make sure the investigation is carried out properly.
- 1.2 Having a structured response plan helps everyone to handle any fraud issues in the same way and avoid potential problems like: inadvertently tipping off the suspect, enabling them to destroy incriminating evidence; failing to keep the matter confidential; and taking inappropriate action caused by having insufficient information.
- 1.3 A Fraud Response Plan ensures that incidents are handled in a systematic and efficient manner, not only to conclude a successful investigation, but also to show that the organisation acted in an effective and lawful manner; and that it does not tolerate fraud.

2. What you should do if you suspect fraud or corruption

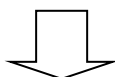
- 2.1 Our employees and councillors are often the first to realise when things may be going wrong, or fraud and corruption may be taking place. However, they may think that they would not be supported if they raised their concerns, or they may even be afraid of being harassed or bullied. In these circumstances, an individual may feel it would be easier to ignore their concerns, rather than report it. We want to tell you that this is not the case.
- 2.2 Our 'Whistleblowing' Policy is in place to encourage and enable individuals to raise legitimate concerns, rather than overlooking a problem. The policy applies to all Haringey employees, staff of Council contractors, agency staff and trainees.
- 2.3 If you suspect fraud or corruption, you should raise your concern with your line manager. Failing that, you should approach your Head of Service, or Assistant Director. If you cannot raise your concern within your own service area, you should approach the Head of Audit & Risk Management.
- 2.4 We want to encourage any member of the public, or a partner organisation, who suspects fraud and corruption to contact the Council's Head of Audit and Risk Management in the first instance.
- 2.5 **Remember:** tell some-one, don't keep it to yourself; make a note of anything which made you think a fraud was happening; keep things confidential initially; do not confront the suspect(s); only take away any evidence if there is any risk that it will be destroyed or thrown away. **Leave the investigation to Audit & Risk Management.**

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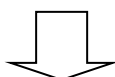
3. Investigations into allegations of fraud or corruption

Although we cannot say how each individual case is dealt with, the following process is outlined as a general guide.

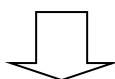
Fraud happens (or is suspected) by an employee



Issue(s) raised with a line manager, Director/Assistant Director



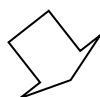
Referral made to Head of Audit & Risk Management (first stage for the public)



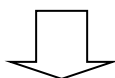
Risk assessment and initial fact finding review takes place by Audit & Risk Management



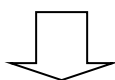
<p>Financial issues identified Case conference is held with investigator, HR and Assistant Director, to agree the next steps. Formal investigation commences – <i>a referral to the police may be made at this stage.</i></p>	<p>No financial issues identified Case closed, or referred for management investigation/follow up if other (non-financial) issues are identified.</p>
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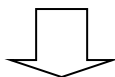
Investigator (or investigation team) is allocated to undertake the work and report within agreed timescales



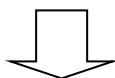
Conclusion of investigation and report to management (including any recommended changes to controls)



Disciplinary action taken where appropriate



Prosecution action taken where appropriate



Loss recovery procedures started where appropriate