

PFCC Decision Report

Report reference number: 102 - 23

Classification: Official

Title of report: The anti-fraud and anti-bribery commitment

Area of county / stakeholders affected: Countywide

Report by:

Janet Perry, Chief Financial Officer and Strategic Head of Performance & Resources

Chief Officer:

Janet Perry, Chief Financial Officer and Strategic Head of Performance & Resources

Date of report: 7 June 2023

Enquiries to:

Janet Perry, Chief Financial Officer and Strategic Head of Performance & Resources

1. Executive Summary

- 1.1. The existing anti-fraud and anti-bribery policy is part of the PFCC Constitution and requires updating. The attached revision is referred to as “the anti-fraud and anti-bribery commitment”.

2. Recommendations

- 2.1. That the PFCC approves and adopts the anti-fraud and anti-bribery commitment attached at Appendix 1.

3. Background to the Proposal

- 3.1. The PFCC and Essex Police promote a zero-tolerance approach towards fraud, bribery, and other malpractice for personal gain. To that extent, dishonesty, lack of integrity, avoidance of controls and failure to comply with agreed policies will not be tolerated.
- 3.2. The Anti-Fraud and Anti-Bribery Policy was last reviewed in 2019 and was subsequently considered by the Joint Audit Committee at its meeting on 22 March 2019.
- 3.3. The policy has been updated to the anti-fraud and anti-bribery commitment and is supported by the wider governance framework and the following interrelated policies, procedures, and regulations:
 - Professional Standards
 - Counter Corruption
 - Dealing with Complaints against the Police
 - Notifiable Association and Meeting Persons on Bail
 - Integrity Assurance
 - Hospitality, Gifts and Gratuities
 - Disclosure of Previous Convictions & Misconduct Findings
 - Use of IT Platforms and Social Media Websites
 - Lawful Business Monitoring
 - Reporting Wrongdoing
 - Managing External Media
 - Charging for Police Services
 - Information Management
 - ICT Acceptable Use
 - Incident Reporting and Management
 - Government Classification Scheme
 - Physical Security
 - Information Sharing Agreements
 - Transaction Monitoring and Audit
 - Appropriate Access and Use of Police Information
 - Police Staff Discipline
 - Employment and Business Interests

4. Proposal and Associated Benefits

- 4.1. The anti-fraud and anti-bribery commitment is key to promoting a strong ethical and counter fraud culture.

5. Options Analysis

- 5.1. We could decide not to update the 2019 policy, however it is due to be updated and there are a number of policies that it overlaps with, which the previous policy does not acknowledge.

6. Consultation and Engagement

- 6.1 The anti-fraud and anti-bribery commitment has been drawn up in consultation with the Deputy Chief Constable for Essex Police and the internal auditors.

7. Strategic Links

- 7.1 The PFCC's budget is invested to help support the achievement of the objectives outlined in the Police and Crime Plan. The anti-fraud and anti-bribery commitment will assist with keeping the PFCC's funds secure.

8. Police operational implications

- 8.1 There are no direct operational implications arising from the approval, adoption and publication of this commitment.

9. Financial implications

- 9.1 There are no direct financial implications, however this commitment will help to safeguard the funds and assets of the PFCC

10. Legal implications

- 10.1 There are no direct legal implications, however this commitment will be included as a schedule to the constitution.

11. Staffing implications

- 11.1 There are no direct staffing implications from the approval, adoption, and publication of this commitment.

12. Equality, Diversity, and Inclusion implications

- 12.1 There are no equality, diversity, or inclusion implications in the development of the commitment and no individual with a protected characteristic is likely to be disadvantaged by this commitment.

13. Risks and Mitigations

- 13.1 There are no risks associated with updating the policy. However, there is the potential risk to funds, assets, and reputation, if we do not update the policy.

14. Governance Boards

- 14.1 The commitment was recommended for approval by the Joint Audit Committee at its meeting on 16 December 2022.

15. Links to Future Plans

- 15.1 The strategy will impact future plans to the extent that it helps keep our assets secure and assists in safeguarding the funds in the 2023/24 to 2027/28 Medium Term Financial Strategy (MTFS) and the 2023/24 budget presented to the Essex Police, Fire and Crime Panel in February 2023.

16. Background Papers and Appendices

Appendix 1 – The anti-fraud and anti-bribery commitment

Report Approval

The report will be signed off by the PFCC's Chief Executive and Chief Finance Officer prior to review and sign off by the PFCC / DPFCC.

Chief Executive / M.O.

Sign: 

Print: P. Brent-Isherwood

Date: 9 June 2023

Chief Financial Officer

Sign: 

Print: Janet Perry

Date: 7 June 2023

Publication

Is the report for publication?

YES

NO

If 'NO', please give reasons for non-publication (Where relevant, cite the security classification of the document(s). State 'None' if applicable)

None

If the report is not for publication, the Chief Executive will decide if and how the public can be informed of the decision.

Redaction

If the report is for publication, is redaction required:

1. Of Decision Sheet? YES
NO

2. Of Appendix? YES
NO

If 'YES', please provide details of required redaction:

N/A

Date redaction carried out:

Chief Finance Officer / Chief Executive Sign Off – for Redactions only

If redaction is required, the Treasurer or Chief Executive is to sign off that redaction has been completed.

Sign:

Print:

Chief Executive / Chief Finance Officer

Decision and Final Sign Off

I agree the recommendations to this report:



Sign:

Print: ROGER HIRST

PFCC

Date signed: 22nd June 2023

I do not agree the recommendations to this report because:

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Sign:

Print: