

**POLICE, FIRE AND CRIME
COMMISSIONER FOR ESSEX**

&

ESSEX POLICE

**The anti-fraud and anti-bribery
commitment**

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1. Purpose

- 1.1. This document sets out the commitment of the Police, Fire and Crime Commissioner for Essex (PFCC) and the Chief Constable of Essex Police in relation to ensuring their staff adhere to the highest standards of ethical conduct, having particular focus on the determination to prevent fraud, bribery and other forms of financial malpractice.
- 1.2. Listed within Annex 1 are twenty-two policies, procedures and protocols which collectively address matters related to professional standards of behaviour, misconduct and counter-corruption. This document is not intended to provide additional procedural guidance. Rather, it aims to provide a lens over the twenty-two documents listed within Annex 1 (“the relevant policies”), drawing together the key themes and overarching strategic approach to ensuring the probity of the workforce and preventing, identifying, and investigating corruption.

2. Application

- 2.1. This document and the relevant policies apply to all police officers and police staff employed by Essex Police and to all those employed by the PFCC, regardless of the position held. For the purposes of this document, this collective group shall be referred to as “employees”. The relevant policies are equally applicable to those instructed or engaged as consultants, vendors and contractors or indeed any other party having a business relationship with either the PFCC or Essex Police.
- 2.2. In implementing the relevant policies, managers must ensure that all employees and engaged third parties are treated fairly and within the provisions and spirit of the Equal Opportunities in Employment Protocol¹. Special attention should be paid to ensuring the policies are understood where there may be barriers to understanding caused by an individual’s circumstances.
- 2.3. All employees should adhere to the College of Policing Code of Ethics, and the Essex Police Professionalism Strategy², which collectively set out and define the expected standards of behaviour, as well as adhering to any additional codes of conduct related to either a professional body to which they are registered, or which are relevant to their specific post.
- 2.4. There is a special responsibility on senior management to lead by example. The PFCC, Chief Constable, chief officers and senior management are expected to conduct themselves in ways which are beyond reproach, and which abide by the Seven Principles of Public Life as laid down by the Committee on Standards in Public Life³.

¹ Contained within Annex 2

² As above

³ As above

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- 2.5.** It is the responsibility of the PFCC, Chief Constable, chief officers and senior management to be aware of the relevant financial and anti-fraud regulations and to ensure the necessary organisational compliance. The Financial and Procurement Regulations⁴ set out the responsibilities of the PFCC, Chief Constable and s.151 Officers in regard to preventing fraud and bribery.
- 2.6.** It is expected that non-executive directors and representatives of external organisations appointed to memberships of management committees within the PFCC and Essex Police at all levels will lead by example in acting with the utmost integrity and ensuring adherence to all relevant regulations, policies, and procedures.
- 2.7.** Organisations undertaking work on behalf of the PFCC or Essex Police, or who are concerned in the supply of agency staff, are expected to espouse strong anti-fraud and anti-bribery principles.

3. Commitment

- 3.1.** The PFCC and the Chief Constable are committed to the promotion of the highest standards of conduct, including the prevention of fraud, bribery, and other forms of corruption.
- 3.2.** In recognising both the responsibility to protect and properly administer public funds, as well as the need to maintain the public's trust and confidence in policing, the PFCC and Chief Constable are jointly committed to a zero-tolerance approach to fraud and other forms of criminal misappropriation.
- 3.3.** The PFCC and Chief Constable will not be afraid to tackle difficult or uncomfortable cases of dishonesty and malpractice and – where misconduct is proven - will take a robust approach, seeking the maximum sanction that is appropriate in the circumstances.
- 3.4.** Instances of fraud and bribery are costly, both in terms of reputational risk and the associated financial losses. The PFCC and the Chief Constable are therefore equally committed to preventing occurrences of financial malpractice in the first place.
- 3.5.** In addition to the moral and ethical case for having strong anti-fraud and anti-bribery policies, the PFCC and Chief Constable recognise the legal requirement imposed on commercially active public bodies to prevent corrupt practices⁵, and the need therefore to have clear, practical and accessible procedures which are effectively implemented and understood by all employees.
- 3.6.** The PFCC and Chief Constable commit to ensuring the relevant policies are monitored and reviewed for effectiveness, and that amendments to

⁴ Contained within Annex 2

⁵ Bribery Act 2010, section 7

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those policies are implemented where necessary to improve the safeguards afforded by them.

4. Anti-Fraud / Anti-Bribery Framework

4.1. The strategic approach to fraud and bribery is based on six key themes:

- Culture
- Prevention
- Deterrence
- Reporting
- Investigation and Detection
- Awareness and Training

4.2. Culture

4.2.1. The PFCC and the Chief Constable recognise that a key component in the prevention of fraud and bribery is the establishment of a clear set of standards, well known to and understood by all employees. This includes reinforcing national models, such as the Code of Ethics, as well as establishing local frameworks for ethics, such as the Essex Police Professionalism Strategy. These ethical frameworks ought to be well publicised within the organisation and regularly emphasised e.g., during recruitment, training and through continuing professional development.

4.2.2. There is a collective role to play for all employees in the prevention and detection of fraud and bribery. This requires a culture where employees are encouraged to raise concerns regarding fraud and bribery, immaterial of seniority, rank, or status, and where employees trust that the concerns they raise will be treated in confidence.

4.2.3. There must equally be clear routes through which members of the public and other third parties are able to report concerns relating to the activities of any employee, and encouragement that such concerns are reported.

4.3. Prevention

4.3.1. In addition to the specific responsibilities placed on the Chief Financial Officers in both Essex Police and the PFCC (s.151 officers) to ensure that there are robust systems of risk management in place to minimise the potential for fraud and financial misconduct, all departments should be challenged to identify related risks applicable to their individual areas, with formal risk registers being used to record risks and mitigations.

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- 4.3.2.** Internal Audit Teams have a role in testing the various controls and highlighting any weaknesses or opportunities for further risk mitigation.
- 4.3.3.** The relevant policies detail the package of measures aimed at preventing instances of fraud and bribery, including vetting procedures, IT security and lawful business monitoring.
- 4.3.4.** Understanding that factors outside of the workplace can give rise to fraud and bribery, the role of staff support mechanisms is recognised, along with the need for managers to appropriately refer staff to support services, such as the Essex Police Financial Wellbeing Hub.

4.4. Deterrence

- 4.4.1.** In instances where an employee has been found to have used their position to act fraudulently, dishonestly manage finances or to corruptly accept or offer monies, the PFCC and Chief Constable will seek the strongest appropriate sanctions against the individual(s) concerned. This may include disciplinary action, criminal prosecution, civil proceedings, financial penalties, or a combination. Where the conduct is committed by an employee of a contractor or partner organisation, the PFCC and Chief Constable will request that the organisation takes appropriate disciplinary action against the individual(s) in addition to the instigation of any criminal proceedings as may be required.
- 4.4.2.** In all cases, the PFCC and Chief Constable will seek to utilise all methods available to recover any fraudulently obtained assets.
- 4.4.3.** Publishing details of criminal sanctions and making available the statistical information relating to disciplinary action taken are further tools to deter others from future misconduct.

4.5. Reporting

- 4.5.1.** All employees and third parties to whom the relevant policies relate have a duty to report any concerns they may have concerning fraud or bribery, and positive action ought to be taken in relation to any suspected corrupt activity.
- 4.5.2.** Financial irregularities can take many forms and can occur without dishonest intent or misconduct-related negligence. Employees should however be encouraged to appropriately report information where there is any cause to suspect fraud or financial misconduct has occurred.

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- 4.5.3.** Given the importance of intelligence and information in identifying corrupt practices, employees should feel able to report concerns, and ought to have confidence that those concerns will be properly investigated and with the welfare of the individual reporting in mind.
- 4.5.4.** The Essex Police Professional Standards Department has a number of methods by which employees can report a concern, including via anonymous means. There are routes by which an individual can report concerns without involving their immediate line manager, which caters for scenarios where the line manager is the subject of the concern.
- 4.5.5.** There are appropriate protocols in place within the relevant policies in relation to protected disclosures and '*whistleblowing*', applicable equally to contractors. Partner organisations are expected to have their own adequate whistleblowing procedures in place.

4.6. Investigation and Detection

- 4.6.1.** Any allegations received in any way, including by anonymous letters or phone calls, will be taken seriously, and investigated in an appropriate manner.
- 4.6.2.** Disciplinary procedures will always be considered where improper behaviour is indicated, and any evidence of criminal behaviour will be appropriately investigated by the Professional Standards Department or the most appropriate investigative agency (e.g., the IOPC). There will be no distinction made in terms of the investigative action taken between cases that generate financial benefits and those that do not.

4.7. Awareness and Training

- 4.7.1.** The PFCC and Chief Constable recognise that the success of the relevant policies will depend on employees being aware of their contents. In addition to bringing the relevant policies to the attention of staff through training and new-starter inputs, this document and all relevant policies are contained within an easily accessible online library.

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5. Review

- 5.1.** This commitment document will be subject to regular review to ensure that it supports the strategic objectives of the PFCC and Chief Constable.
- 5.2.** This commitment document will be formally reviewed every three years.

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Annex 1

The Relevant Policies






Number	Title	Type
C3000	Professional Standards	Policy
C3002	Counter Corruption	Procedure
C3001	Dealing with Complaints against the Police	Procedure
C3004	Notifiable Association and Meeting Persons on Bail	Procedure
C3006	Integrity Assurance	Procedure
C3008	Hospitality, Gifts and Gratuities	Procedure
C3009	Disclosure of Previous Convictions & Misconduct Findings	Procedure
C3011	Use of IT Platforms and Social Media Websites	Procedure
C3014	Lawful Business Monitoring	Procedure
C3015	Reporting Wrongdoing	Procedure
G0600	Managing External Media	Policy
G1901	Charging for Police Services	Procedure
W1000	Information Management	Policy
W1001	ICT Acceptable Use	Procedure/SOP
W1004	Incident Reporting and Management	Procedure/SOP
W1006	Government Classification Scheme	Procedure/SOP
W1008	Physical Security	Procedure/SOP
W1014	Information Sharing Agreements	Procedure/SOP
W2011	Transaction Monitoring and Audit	Procedure
W2013	Appropriate Access and Use of Police Information	Procedure
L01200	Police Staff Discipline	Protocol
L11060	Employment and Business Interests	Protocol

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Annex 2

Policies and Frameworks Referred to

The following policies and frameworks are referred to within this commitment document and are appended here for reference:

	Policy / Framework	Source	Document
2.2	Equal Opportunities in Policing Protocol	Essex Police	 Protocol - Equal Opportunities in Err
2.3 4.2	The Code of Ethics	College of Policing	 Code of Ethics.pdf
2.3 4.2	Professionalism Strategy	Essex Police	 Professionalism Strategy 2022-2025.1
2.4	Seven Principals of Public Life	Committee on Standards in Public Life	 Standards Matter.pdf
2.5	Financial and Procurement Regulations	PFCC for Essex	 Financial and Procurement Regula