



Anti-Fraud, Bribery and Corruption Policy (Surrey and Sussex) (612/2025)

Abstract

This policy defines corruption and fraud within the context of policing. It provides a framework for identifying and preventing corruption and details what actions should be taken by an individual where corruption and/or fraud is suspected or has been committed by colleagues.

Policy

1. Introduction

1.1 This policy is required to help prevent and reduce the risk of corruption and fraud within Surrey Police and Sussex Police (hereafter referred to as the Forces) by following an effective Anti-Fraud and Anti-Corruption Strategy designed to:

- Ensure prevention
- Facilitate detection
- Promote confidence in early reporting
- Identify a clear pathway for investigation and remedial action
- Comply with the new Anti-Fraud legislation issued in Nov 2024 under the Economic Crime and Corporate Transparency Act 2023 (ECCTA).

1.2 This policy applies to all individuals who represent and or work for the Forces including police officers, police staff, Special Constables, staff held in reserve, staff working at the Office of the Police and Crime Commissioner, volunteers, temporary staff, agency staff and strategic partners (hereafter referred to as staff).

2. Scope

2.1 This policy defines what amounts to corruption and fraud within the police service. It provides guidance on what steps to take if corruption or fraud is identified or suspected and includes the various ways suspected breaches can be reported, including financial irregularities. It also details the requirement to declare if you have an interest in an existing or future business enterprise that the Forces have or are considering having an association with.

It does not cover individuals acting in their capacity as part of any approved secondary employment which are covered within individual Force Policy and Procedures.

This policy should be read in conjunction with Gifts, Gratuities and Hospitality Policy (Surrey and Sussex) (1201) and Donations and Sponsorship Received from Members of the Public, Companies and other Bodies Policy (Surrey and Sussex) (489)

3. Policy Statement

3.1 The Forces are determined to protect ourselves and staff against fraud and corruption both from within the police forces and from external sources and our expectation regarding probity and accountability is that officers and staff at all levels will lead by example in ensuring adherence to legal requirements, Police Regulations, policy, procedures, and the Code of Ethics.

3.2 Everyone must ensure compliance with the Bribery Act 2010 including complying with the procedures in this policy. Any breach will be treated most seriously and may result in disciplinary proceedings. Any non-employee who breaches this policy may have their contract terminated with immediate effect. In either case, a criminal report may also be made.

Procedure

1. Overview

1.1 Whilst corruption is not seen as endemic in the police service, the threat from corruption is real. Many, including criminals, are keen to obtain police information or otherwise corrupt our staff in order to protect their own activities, to frustrate law enforcement activity or gain some other personal or commercial benefit.

1.2 It is important that our staff are aware of the Force's expectation regarding probity and accountability and lead by example in ensuring adherence to legal requirements, Police Regulations policy, procedures, and the Code of Ethics.

2. Definitions of Fraud and Corruption and Bribery

2.1 Corruption is defined by the National Police Chiefs' Council (NPCC) Counter Corruption Advisory Group (NPCCAG) as;

"Improper exercise of a power or privilege for the purpose of achieving a personal benefit, or a benefit or detriment of another person".

Fraud is defined as: "The intentional distortion of financial statements or other records by persons internal or external to the organisation which is carried out to conceal the misappropriation of assets or otherwise for gain".

Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit. Bribery includes offering, promising, giving, accepting or seeking a bribe.

All forms of bribery and fraud are strictly prohibited.

Associate (Senior officers and employees, corporate connection of the Forces).

3. Discounts or Concessions from Retailers

3.1 Many large employers provide schemes whereby their staff can obtain discounted products from a variety of different businesses or suppliers. This is a common practice and is often seen as part of an incentive or retention package. The police service must guard against any suggestion that individuals could be influenced by a deal offered by a particular company.

3.2 The following principles apply;

- All offers to be circulated through the People Services Benefits Hub and the Surrey and Sussex Police Federation website will be subject to the approval of the Head of Professional Standards Department (PSD) who has the right to request their withdrawal if deemed inappropriate.
- Discounts should apply to all individuals irrespective of rank or position (although there can be geographically targeted offers in individual cases).
- The discounts should not be disproportionate.
- Agreements will only be approved where the likelihood of bringing the Force into disrepute has been considered and assessed as low risk.
- When applying for an approved discount personnel may use their staff ID / warrant card as identification.

Use of Surrey Police or Sussex Police email address should be avoided as a form of identification unless specifically asked for.

3.3 The Head of PSD for the relevant Force will assess any offers as to whether there is potential (either perceived or actual) for it to be detrimental to public confidence.

3.4 Where an offer is made by a single business (i.e. not part of a chain) it will generally not be accepted; this would effectively be a more 'personal' offer where there is a greater opportunity for direct contact and more risk of the personnel providing a different service as a result. While it is accepted this could benefit larger retailers rather than small local businesses, consideration must be given to potential risks of corruption.

3.5 Where an offer is made it should not be exclusively for the Forces personnel but should be part of a wider scheme where other local businesses or services also receive the same benefit (i.e. all emergency services personnel). There may be some cases where the discount is only applicable to both Forces, but this should be very rare and will only be applicable where the goods / service offered is directly relevant to the role.

4. Raffle Prizes

4.1 The Force's staff should not use their association or employment with the Forces (unless authorised e.g. Chief Constable's Charities) to approach corporate bodies, local businesses or business partners seeking the donation of prizes for a raffle.

5. Uniform and Equipment as Gifts

5.1 Requests for uniform items to be given as gifts to visiting Forces, to take as gifts when visiting other Forces or for nostalgic purposes, i.e. retirement, must be considered

and approved by a Chief Inspector / police staff equivalent M1 / L1 or above due to the security risks linked to the impersonation of police officers and police staff. Requests should then be submitted through the Awards and Ceremonies team as they have procedures in place and standard items they use.

6. Loyalty Cards / Point Schemes

6.1 There can be no individual gain when purchasing items or fuel for work purposes. Advantages such as reward point schemes / air miles etc. cannot be collected.

7. School Application Process

7.1 The Force's staff must comply with Local County Council admissions policy when applying for a school place for your child. Any appeal or representations employees as parents wish to make in respect of the awarding of school places that are unconnected with their employment can be undertaken in the normal way and are not covered by this procedure.

7.2 The fact that you are a member of staff must not be used as part of the general application process and should not be given consideration when deciding admissions.

7.3 When in exceptional circumstances an operational role has created a high-risk situation for staff or their family, which may prevent a child from attending the local school, the officer or employee should submit an application to their line manager for corroboration that they meet the criteria to be permitted to apply for alternative schooling. If supported by the line manager, the application will be submitted to the Head of Department for consideration and once approved, will be passed to the Head of PSD for authority to allow the employee to apply to the County Council for Community and voluntary controlled schools, or directly to Own Admission Authorities for their personal circumstances to be considered in respect of alternative schooling.

7.4 The application for school's admissions does not require parents / guardians to provide details of their employment. Staff should not include details of their employment as part of the general application process. This will prevent any perception that an officer or employee is attempting to use their position to influence admission decisions.

7.5 If staff provide details of their employment as part of the general school's admissions process it may be considered as a disciplinary offence.

8. Declaration of Interest

8.1 The Forces hold existing contracts with suppliers and at times will actively undertake on-going procurement for goods and services.

8.2 The offer of a gift or hospitality perceived to be with the object of obtaining preferential treatment should be declined. Refer to Gifts, Gratuities and Hospitality Policy (Surrey and Sussex) (1201).

8.3 Any member of staff who has either a potential or established commercial or private interest in any contract or agreement placed or to be placed for or on behalf of the Forces must: -

- Immediately declare that interest to their line manager

- Immediately remove themselves from the process

Any declarations of interest by those involved in awarding contracts should be sent to the Procurement Department. Refer to the Procurement Policy (Surrey and Sussex) (596)

9. Your Responsibilities

9.1 Staff must ensure that they read, understand and comply with this policy and procedures.

9.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Forces. Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy and procedures.

9.3 The Force's staff must notify their line manager or one of the other reporting processes set out in these procedures as soon as possible if you believe or suspect that a conflict with this policy and procedures has occurred or may occur in the future.

9.4 The College of Policing Code of Ethics sets out the workforce's responsibility to 'report, challenge or take action against the conduct of colleagues which has fallen below the standards of professional behaviour'

10. Whistleblowing and Protected Disclosures

10.1 The Forces will support anyone who refuses to accept or offer a bribe or honestly raises a genuine concern of a breach of the Standards of Professional Behaviour even if this turns out to be incorrect. The Forces will not tolerate discrimination or victimisation or any other detrimental treatment against anyone who makes a disclosure of improper conduct or wrongdoing in good faith. If as a matter of law the disclosure is a 'protected disclosure' within the meaning of the Public Interest Disclosure Act 1998 the person making the disclosure has the right not to be subjected to any detriment as a consequence. Please see the Whistleblowing and Protected Disclosure Procedure.

11. Methods of Making a Report of Wrongdoing

11.1 All persons serving with the police have a duty to report any improper conduct or wrongdoing they witness or become aware of regarding another person serving in policing regardless of their rank or status.

11.2 Whilst outlining how to make a report about the professional standards of a colleague, it is understood that there is, in the police, a culture of protecting each other against unjust or false allegations. The guidance, therefore, outlines how an individual making a report will be supported and helped through any investigation and subsequent criminal or disciplinary process. Nevertheless, those who make a report about professional standards must be aware that they may be required to give evidence at a hearing.

11.3 The choice of method of reporting is a matter for the individual. There may be other routes by which information can be brought to notice or an external authority body that the individual could report the matter should they wish. The Public Interest Disclosure Act 1998 sets out a number of bodies to which qualifying disclosures may be made in certain circumstances.

12. Internal Reporting

12.1 For police officers, the Standard of Professional Behaviour 'Challenging and Reporting improper Conduct', states;

"Police officers report, challenge or take action against the conduct of colleagues which has fallen below the Standards of Professional Behaviour.

Please see the Internal Reporting Guidance.

13. Financial Irregularities

13.1 A financial irregularity is defined as:

Any act or omission by a member of staff or a third party, undertaken for personal gain, which has resulted or could result in a loss to the Forces of their assets or any other non-Surrey Police / Sussex Police asset in the trust of an individual (e.g. assets of partners or other associated bodies); the unauthorised use of the Force's resources for personal gain without necessarily any direct loss to the Force or Authority. It could also mean any breach of Financial Regulations; and/or the result of carelessness or incompetence on the part of a member of staff resulting in the records, stores, funds etc. being in a state that either makes it difficult to determine whether all assets have been accounted for or makes it easy for someone else to misappropriate.

Assets include cash, stores, property, equipment or information.

13.2 Financial irregularities can take many forms. When in doubt it is best to disclose information which officers or staff consider might fall into this category. Reporting methods are as set out in section 12.

13.3 If the irregularity is reported to a manager, they must notify their Force's Service Director, Finance and Regional Services and Chief Finance Officer (CFO) as soon as possible.

13.4 The Service Director, Finance and Regional Services and CFO or their deputy will arrange for the appropriate Chief Constable to notify the Surrey and/or Sussex Police and Crime Commissioner (PCC) Chief Finance Officer within 3 working days of being informed of the financial irregularity.

13.5 Where a crime or potential crime is suspected, the Service Director, Finance and Regional Services and CFO will notify the PSD. Otherwise, the Service Director, Finance and Regional Services and CFO will look into the case and call-in whatever audit services they consider necessary.

13.6 If PSD is notified of a financial irregularity via the anonymous contact system, or by any other means, it will immediately notify the Service Director, Finance and Regional Services and CFO.

13.7 The Chief Constable will inform the Service Director, Finance and Regional Services and CFO of the results of any investigation undertaken by the Force as soon as those results are available.

14. External Reporting

14.1 There are a variety of means to make external reports regarding fraud, corruption, or bribery. Please see the External Reporting Guidance.

15. Confidentiality

15.1 Confidentiality will be given the highest priority. All individuals should be aware that the legal rules governing “disclosure” will apply to cases under this procedure. When confidential information has been received, this will be handled for disclosure purposes in a similar way to criminal intelligence.

15.2 All reasonable efforts will be made to prevent disclosure of the reporters’ identity. Where this is not possible arrangements will be made as outlined at section 16.

15.3 Should individuals choose to report information anonymously and continue to maintain their anonymity following disclosures, they cannot be provided the full protections and support afforded to ‘whistleblowers’ as outlined in this policy, irrespective of whether it is assessed to be a qualifying disclosure. The rationale for this statement is obvious: if the informant cannot be identified by those charged to provide them support or determine whether to allow them protection, such as amnesty from discipline / misconduct proceedings, then it is clear that no support or amnesty is possible.

16. Arrangements for supporting personnel who make reports concerning Professional Standards

16.1 Reporting a concern can be a stressful process, and it is essential that support mechanisms are in place for those who decide to come forward. The Forces are responsible for ensuring appropriate support is provided to those who come forward. Where someone comes forward, the organisation should value their actions. For information refer to

Whistleblowing and Protected Disclosure Procedure

Internal Reporting Guidance

External Reporting Guidance

Guidance is also available for those officers and staff under investigation and is available on the intranet Guidance for officers and staff under investigation

17. Malicious Allegations

17.1 Reports of alleged misconduct that are made in good faith, even if subsequently shown to be mistaken, will not result in any repercussion against the individual making them. Some officers or staff members may be reluctant to come forward and report wrongdoing, believing that doing so could lead to unfair treatment by their Force or colleagues. The Government has amended the Police (Conduct) Regulations 2020 to state that action should not be taken against an individual for raising a concern (provided it is not done maliciously or is knowingly false). Anyone making a reprisal against a person reporting concerns will be liable for disciplinary action.

17.2 If, however, it is found that reports were made maliciously, the Forces retain the right to consider the possibility of disciplinary / misconduct action against the originator.

Team: Professional Standards Department