



## Anti-Fraud, Corruption and Bribery Surrey and Sussex (612)

### Supporting Documents/Procedures

- [Gifts & Hospitality Authorisation Pro-forma](#)

### 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 and Sussex Police in the first instance and ensure the receipt of gifts and hospitalities are recorded correctly and transparently 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
- 1.2 It complies with appendix XI of the National Police Chiefs' Council (NPCC) Guidance for the Investigation of Corruption within the Police Service and the National Crime Agency (NCA) tri - annual strategic assessment.
- 1.3 This policy applies to all persons working for us on our behalf in any capacity, including employees at all levels, officers, agency works, seconded workers, volunteers, interns, agents, contractors and external consultants or any other persons associated with us irrespective of where they are located.

## 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 restrictions around offers of gifts, hospitalities, discounts, gratuities and the requirement to declare if you have an interest in an existing or future business enterprise that Surrey and / or Sussex have or are considering.
- 2.2 It does not cover Sponsorship or individuals acting in their capacity as part of any approved **secondary** employment which are subject to individual Force Policy and Procedures.

## 3. Policy Statement

- 3.1 Surrey and Sussex Police are determined to protect ourselves and our police officers and police 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 and procedures.
- 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 and possibly a criminal report. Any non-employee who breaches this policy may have their contract terminated with immediate effect.
- 3.3 This policy does not form part of any employee's contract of employment and we may amend it at any time. It will be reviewed regularly.

## Procedure

### 1. Introduction

- 1.1 Surrey and Sussex Police are determined to protect ourselves 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 and procedures.
- 1.2 It is important that all police officers and police staff at all levels including the wider police family of consultants, voluntary, temporary and agency staff and IT contractors are aware of the Force's expectation regarding probity and accountability and lead by example in ensuring adherence to legal requirements, Police Regulations and Policy and Procedures.

## **2. Definition of Fraud and Corruption and Bribery**

- 2.1 **Corruption** is defined by the Independent Office for Police Conduct (IOPC), formerly the **Independent Police Complaints Commission (IPCC)/NPCC Counter Corruption Advisory Group (ACCAG)** as occurring where:

“A Law Enforcement official commits an unlawful act or deliberately fails to fulfil their role arising out of an abuse of their position, for personal or perceived organisational advantage, having the potential to affect a member of the public.”

**Fraud** is defined as: “The intentional distortion of financial statements or other records by persons internal or external to the authority 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.

## **3. Gifts, Gratuities and Hospitality Notification Process and Register**

- 3.1 The acceptance of gifts, discounts, gratuities or hospitality can undermine personal and professional integrity and can lead to allegations of corrupt practices or improper relationships with members of the public or corporate bodies.
- 3.2 Police officers and police staff must act with honesty and integrity and must not compromise or abuse their position. They should never solicit the offer of any gift, gratuity, favour or hospitality in any way connected to or arising from their role within the police service, whether on or off duty.
- 3.3 All offers, whether accepted or declined must be recorded on each [Force's Gifts & Hospitality pro-forma](#).
- 3.4 In Surrey the [Pro-forma](#) must be submitted to PSD Joint Force Vetting Unit (**JFVU**) via [e-mail](#) to [businessinterests.vetting@sussex.pnn.police.uk](mailto:businessinterests.vetting@sussex.pnn.police.uk) within seven working days of receipt of any gift or hospitality. All cases will then be centrally recorded within the **JFVU**.

In Sussex the pro-forma must be submitted to PSD JFVU via e-mail on [businessinterests.vetting@sussex.pnn.police.uk](mailto:businessinterests.vetting@sussex.pnn.police.uk) for all offers, whether accepted or declined. The e-mail should also be copied into the departmental or divisional Command Secretarial Assistant (CSA) for the information of the relevant command team. Details of all gifts and hospitality offers will be recorded on the

Gratuities Register which is stored on the Centurion Force Information System held within PSD

- 3.5 Details relating to the nature of the gift and the donor will be retained for a period of seven years.
- 3.6 All personal information relating to an officer or member of staff will be retained for a period ending seven years after their end of service.
- 3.7 The register will be reviewed by the Head of each Force's PSD in conjunction with the Joint Surrey/Sussex Procurement unit. It is also subject to regular scrutiny by the Office of the Police and Crime Commissioner (OSPCC) for each Force.
- 3.8 No police officer or member of police staff will produce a warrant card or ID card, or wear whole or part uniform, to obtain discounts, goods or services unless as part of an approved arrangement. For example, this includes using a warrant or ID card to gain free access to nightclubs, sporting events or other commercial premises.
- 3.9 Accepting free or discounted food or services whether on or off duty is unacceptable if the provision is because the donor is aware of the recipient's role.
- 3.10 There is a clear distinction between a gift, which may include something as simple as a hot beverage, creating an implicit obligation on the part of the police and refreshment that is an integral part of routine policing and builds public confidence. Police officers and police staff should be sensitive to accepting hospitality in commercial establishments where even the perception of an inducement might occur and adversely affect either Force's reputation.
- 3.11 On occasion, a police officer or member of police staff may be required to attend a conference hosted by a third party for the purposes of their role. At these events, subsistence based refreshment may be accepted if appropriate as they form part of the conference package and will not be perceived as compromising the officer's integrity. By way of contrast, corporate hospitality which extends to a fine dining experience or sporting event, could however be seen to be used as a tool of coercion and should be politely declined and declared accordingly.
- 3.12 These examples demonstrate two polar opposites which are easy to identify, there may be situations which are harder to categorise, in these situations an officer will need to apply their own professional judgement for which they would be willing to give an account under scrutiny and at the earliest opportunity, discuss with their line manager. If police staff you must contact your line manager for advice before making a decision and record discussions had.
- 3.13 This procedure should not be interpreted in a way that would, for example, prevent neighbourhood staff from accepting light refreshments as a common

courtesy when carrying out police duties, or inexpensive promotional products from partnerships or conferences. It is important however, that officers and staff be fully aware that in circumstances where an unsolicited offer of a personal gift or gratuity is made, the assumption should be that it will be politely declined.

3.14 Staff must not accept personal gifts of money (or gift vouchers) in the course of their duties or employment (including in any off duty situation) where the gift is related to, or may appear to have a connection to their duties or employment, under any circumstances, except as a donation to the Force. Where an offer of a gift of cash is made it will be declined, reported to a supervisor and a gift & hospitality pro forma document will be submitted.

#### **4. Discounts from Retailers**

4.1 Many large employers provide schemes whereby their staff can obtain discounted products from a variety of different businesses. 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 staff could be influenced by a deal offered by a particular company.

4.2 The following principles apply;

- All offers to be circulated through the Information Hub and the Surrey and Sussex Police Federation website will be subject to approval of the Head of PSD who has the right to request their withdrawal if deemed inappropriate.
- Discounts should apply to all Surrey and Sussex Police personnel 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 there is no likelihood of bringing the force into disrepute
- When applying for an approved discount personnel may use their staff ID/warrant card as identification.

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

4.4 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.

4.5 Where an offer is made it should not be exclusively for Surrey and Sussex Police 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

including military). There may be some cases where the discount is only applicable to Surrey and Sussex Police but this should be very rare and will only be applicable where the goods/service offered is directly relevant to the role.

## **5 Raffle Prizes**

- 5.1 No officer or member of staff should approach corporate bodies, local businesses or business partners seeking the donation of prizes for a raffle.

## **6 Uniform and Equipment as Gifts**

- 6.1 Requests for uniform items to be given as gifts to visiting Forces or to take as gifts when visiting other Forces will be refused due to the security risks linked to the impersonation of police officers.

## **7 Loyalty Cards/Point Schemes**

- 7.1 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.

## **8 Recording Requirements**

- 8.1 A single gifts and hospitality register for each Force will be maintained and will be available on the respective Surrey and Sussex Police website to demonstrate an open, accountable and transparent process and donors must be advised that their details may be published. There may be exceptions to this, for example if the donor is a victim of crime and exclusions will be determined by the Head of PSD.
- 8.2 Hospitality which is considered pre-planned, for example an event taking place at some point in the future, must be notified to PSD in advance of the event taking place. This allows for an assessment to be made regarding appropriateness. This is particularly relevant where the donor is a commercial organisation and may require approval by the Joint Procurement Team. The same pro forma and process is to be used for advance notifications.
- 8.3 In determining whether hospitality should be accepted the following should be considered:
- The value and significance of the gift/hospitality?
  - Who is offering the hospitality and what is the motive of the person offering the gift/hospitality?
  - What are the background circumstances?
  - What does the donor expect in return?
  - Would this compromise or could it create the perception of favour in the way a service is provided or is to be provided in the future?
  - Is there a business relationship in existence where the provision and acceptance would compromise an individual's impartiality or may give the impression of doing so?

- Is it considered to be in the interest of the Force to accept or attend?
- Is acceptance likely to damage the reputation of Surrey or Sussex Police?

8.4 If presented with a gift/hospitality, which it would be discourteous to refuse, it may be accepted and the donor should be advised that permission to retain the gift/accept the hospitality will be sought.

8.5 In Surrey and Sussex, all gifts and offers of hospitality will be subject to oversight from the Head of PSD.

## **9 Declaration of Interest**

9.1 Surrey Police and Sussex Police hold existing contracts with suppliers and at times will actively undertake ongoing procurement for goods and services.

9.2 The offer of a gift of hospitality perceived to be with the object of obtaining preferential treatment should be declined. In such instances the gifts and hospitality pro forma will be completed.

9.3 Any officer or 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 Surrey or Sussex Police must:

- Immediately declare that interest to their line manager and complete a hospitality, gifts and declaration of interest pro forma
- Immediately remove him/herself from the process

## **10 Reporting of Financial Irregularities**

10.1 Surrey Police & Sussex Police's Financial Regulations require that either Force reports any financial irregularity to their respective PCC as soon as they become aware of it.

10.2 In order for either Force to be able to do this all Surrey Police & Sussex Police Officers and Police Staff must report a financial irregularity as soon as they become aware of it.

### **10.3 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 Surrey or Sussex Police of its assets or any other non-Surrey/Sussex Police asset in the trust of an individual (e.g. assets of partners or other associated bodies); the unauthorised use of Surrey and Sussex Police'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.

#### **10.4 Assets include cash, stores, property, equipment or information.**

Financial irregularities can take many forms. When in doubt it is best to disclose information which officers and staff consider might fall into this category. Reporting methods are as set out in 'Methods of Making a report' below.

- 10.5 If the irregularity is reported to you as a manager, you must notify the Force's Director of Finance and Services Sussex (DFS) / Head of Finance Surrey (HoF) as soon as possible.
- 10.6 The DFS/HoF or his/her deputy will arrange for the Chief Constable to notify the Surrey and/or Sussex PCC Chief Finance Officer within 3 working days of being informed of the financial irregularity.
- 10.7 Where a crime or potential crime is suspected, the DFS/HoF will notify the Professional Standards Department (PSD). Otherwise the DFS/HoF will look into the case, and call in whatever audit services he/she considers necessary.
- 10.8 If PSD is notified of a financial irregularity via the anonymous contact system, or by any other means, it will immediately notify the DFS/HoF.
- 10.9 The Chief Constable will inform the Chief Finance Officer of the results of any investigation undertaken by the Force as soon as those results are available.

#### **11. Methods of Making a Report of Wrongdoing**

- 11.1 All members of staff of Surrey and Sussex Police have the responsibility to ensure that the Force Policy on corruption is upheld, irrespective of their rank or status.
- 11.2 Any individual who carries out a dishonest, corrupt or unethical action compromises the high standards of Surrey Police & Sussex Police, and potentially damages public confidence. Any individual, who knows or suspects a colleague to be acting this way and does nothing effectively condones the activity. This in turn opens up to criticism the reputation of every other colleague as well as that of him or herself and could lead to disciplinary action being taken.
- 11.3 This means that there will be times when a member of staff has to report concerns over the behaviour of a colleague and the following guidance sets out how this can be done.



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

## **12 Qualifying Disclosures**

12.1 The Enterprise and Regulatory Reform Act 2013\*\* amended both the Public Interest Disclosure Act 1998 and the Employment Rights Act 1996 in providing protection for workers who raise legitimate concerns about specified matters. These are called 'qualifying disclosures.' A qualifying disclosure is one made in the public interest by an individual who has a reasonable belief that:

- A criminal offence;
- A miscarriage of justice;
- An act creating a risk to health and safety;
- An act causing damage to the environment;
- A breach of any other legal obligation; or
- Concealment of any of the above;

is being, has been, or is likely to be committed. It is not necessary for the individual to have proof that such an act is being, has been, or is likely to be committed, having a reasonable belief is sufficient. The individual has no responsibility for investigating the matter – it is the organisation's responsibility to ensure that an investigation takes place.

12.2 An individual who makes such a protected disclosure has the right not to be dismissed or subjected to victimisation because they have made the disclosure.

12.3 This guidance is for disclosures about matters other than a breach of a police staff member's own contract of employment or police regulations/determinations. Where an individual feels their contract or police regulations/determinations have been breached, such matters should be dealt with by following the grievance resolution procedure.

12.4 An instruction to cover up wrongdoing is a disciplinary/misconduct matter. If told not to raise or pursue any concern, even by a person in authority such as a manager, individuals must not agree to remain silent.

**NB:** The Enterprise and Regulatory Reform Act 2013 has changed the law on whistleblowing. The government has closed what it considers to be a loophole created by the *Parkins v Sodexo* case in 2002. The defence has been changed

from “in good faith” to “public interest” and now whistle-blowers will only be protected if they reasonably believe the disclosure is in the public interest

### **13. Individual Responsibilities**

- 13.1 Individuals must ensure that they, read, understand and comply with this policy and procedures.
- 13.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of those working for Surrey Police and Sussex Police under their control. Individuals are required to avoid any activity that might lead to, or suggest, a breach of this policy and procedures.
- 13.3 Individuals must notify their line manager or one of the other reporting processes set out in these procedures as soon as possible if they believe or suspect that a conflict with this policy and procedures has occurred, or may occur in the future.

### **14. Internal Reporting**

- 14.1 The Police Code of Ethics 2014 provides a number of principles to guide and inform the actions and decisions of police officers and staff. This includes a section on challenging and reporting improper conduct and which makes the following statement of expectation; “I will report, challenge or take action against the conduct of colleagues which has fallen below the standards of professional behaviour.”
- 14.2 All staff must notify any concerns or complaints received from any source that Surrey Police or Sussex Police have breached or may have breached or may have breached the Bribery Act 2010 immediately to their line manager.
- 14.3 All staff may make confidential reports directly to line management they have anti-corruption concerns. These reports, however presented must be acted upon by the person receiving them and feedback provided, if appropriate.
- 14.4 If the line manager is believed to be involved, the report may be made to another manager.

### **15. Confidential reporting**

- 15.1 Anti-Corruption Units recognise the fact that there may be circumstances where the person is reporting an issue of concern may wish their involvement with PSD to remain on a confidential basis e.g. where there is a risk to personal safety, or where disclosure would have a serious detrimental effect on the quality of life in the domestic or workplace environment
- 15.2 Police officers and police staff should contact PSD so that matters of confidentiality can be discussed. Decisions regarding confidentiality will be managed sensitively by PSD and the person making the report will be kept fully informed of any decisions made in relation to the disclosure.

## **16. Anonymous Reporting**

16.1 There may be occasions where an officer or member of staff does not feel that they can openly report their concerns. An anonymous method of reporting concerns to either PSD Unit is provided as follows:

- Using the 'Break the Silence' section of the Sussex Police intranet or [Anonymous](#) section of the Surrey Police intranet, facilitates a 'two-way' communication between the PSD Anti-Corruption Unit (ACU) and the person making a report, while maintaining the user's anonymity. The systems are akin to text messaging where the 'conversation' will be available to both parties to view and make contributions whilst retaining their anonymity. This allows for the sharing of certain attachments such as Jpegs and new word document between the user and the ACU. The system will rename the attachment prior to displaying this to the ACU, who have absolutely no way of identifying the user details or the computer where the report has come from.
- To access the system, simply go to the front page of the intranet and scroll to the 'contacting PSD Anonymously' section and select 'break the silence' for Sussex or 'Anonymous' for Surrey.

## **17. Break the Silence/Anonymous Contact Systems**

17.1 This allows a secure method of communication that preserves anonymity but allows PSD Anti-Corruption Unit to communicate with the sender. The PSD Anti-Corruption Unit will respond to all contacts via the Break the Silence/Anonymous Contact System within 48 hours and in most cases will seek to develop the information by further contact with the sender in order to obtain additional information.

## **18. Through the Police Staff Association or Unison**

18.1 These organisations can and do act as an agent through which members can relay their concerns in a safe environment. Representatives are trained and used to dealing with information in a confidential way, and will offer advice on whether a particular set of circumstances need to be formally reported.

## **19. External Reporting**

### **19.1 Crimestoppers**

Crimestoppers provides a way for providing information anonymously regarding crime and is, therefore, considered to be a valid alternative in appropriate circumstances. To contact Crimestoppers telephone 0800 555 111.

### **19.2 Direct to the Independent Office for Police Conduct Report Line.**

If you are concerned about wrongdoing by a colleague and do not wish to use one of the other available means to make a report then you can report your concerns to the IOPC Report Line. The IOPC Report Line is a dedicated phone line and email

address for police officers and staff to report concerns of wrong doing in the workplace.

Police officers and staff can contact the dedicated IOPC report line on: [enquiries@policeconduct.gov.uk](mailto:enquiries@policeconduct.gov.uk) or 0845 8770061.

### **19.3 The Chartered Institute of Public Finance and Accountancy (CIPFA)**

The CIPFA have launched a forum (the Corporate Governance and Counter Fraud Forum) to deal with fraud and corruption issues in the public sector. The forum has produced a charter, which aims to develop a common fraud strategy across the public sector. The Accounts and Audit Regulations Act 1996, imposes responsibilities on the Treasurer in relation to accounting records and control systems.

### **19.4 Criminal Cases Review Commission (CCRC)**

The Public Interest Disclosure Act identifies the CCRC as the body to which any member of the police service can bring to notice any allegation of miscarriage of justice without fear of recrimination or retribution. The CCRC is the body designated by the Criminal Appeal Act 1995 for the review of miscarriages of justice.

Should employees choose to report information anonymously and continue to maintain their anonymity following disclosures they cannot be provided the full protections and support afforded to 'whistle-blowers' 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.

## **20. Choice of Method of Reporting Wrongdoing**

20.1 This 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 to should they wish. The Public Disclosure Act 1998 sets out a number of bodies to which qualifying disclosures may be made:

- HM Revenue & Customs
- The Financial Conduct Authority (formerly the Financial Services Authority)
- The Office of Fair Trading
- The Health & Safety Executive
- The Environment Agency
- The Director of Public Prosecutions
- The Serious Fraud Office

## **21. Arrangements for Supporting Personnel who make Reports Concerning Professional Standards**

- 21.1 When the identity of the individual and the fact that he or she has made a report is known to colleagues, appropriate support will be given from the outset and will continue for as long as necessary. This will include management support and action, staff association/trade union involvement and advice on access to professional support services.
- 21.2 Consideration will also be given in all cases to holding a meeting between the senior investigating officer and the senior local line manager. The purpose of this meeting will be to inform managers of the investigation, its scope and seriousness and to formulate an agreed way to proceed that will offer the originating member of staff support. If held, such meetings will be closed and confidential and will consider protection matters arising from a risk assessment, the information that can be shared outside the meeting and the details of what will be in a support plan.
- 21.3 In particularly sensitive cases the meeting is chaired by the Head of PSD. In all cases of this type an NPCC officer is appointed to ensure the appropriate support is given to the person making the report.
- 21.4 Any victimisation of an individual who has made a report relating to the actions of a colleague will be robustly managed.
- 21.5 In the most serious of cases, a threat assessment will take place at an early stage and, if appropriate, measures providing support and reassurance will be put in place.

## **22. Confidentiality**

- 22.1 Confidentiality will be given the highest priority. All members of staff 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.

## **23. Limitations on Discipline/Misconduct Proceedings**

- 23.1 Staff reporting wrongdoing, whether it turns out to be founded or not will not be subject to misconduct proceedings if they have acted in good faith. A distinction will be made in relation to any complaints/misconduct allegations that arise separately to the matters reported and both will be dealt appropriately, in accordance with the circumstances of the cases and relevant procedures.

## **24. Criminal Proceedings Following a Report**

- 24.1 In very limited circumstances, staff who are themselves guilty of discipline or misconduct offences may be afforded some protection if they are able and willing to give evidence of criminal activity or serious breaches of discipline. This will be a matter for consideration by the Crown Prosecution Service (CPS.) Criteria that will be considered include:

- The evidence being given is essential;
- The evidence is needed to support a successful prosecution;
- The member of staff concerned has not taken part in the criminal offence; or

- The individual has not gained from a serious breach of discipline.

24.2 The arrangements and facilities provided in criminal courts when a defendant has assisted the investigator will also be applied in suitable cases

## **25. Malicious Allegations**

25.1 It is recognised that the majority of reports will be made in good faith, if however, it is found that reports were made maliciously, the possibility of disciplinary/misconduct action against the originator will be considered.

**Team:** Professional Standards