

GREATER MANCHESTER POLICE AUTHORITY



ANTI-FRAUD AND ANTI-CORRUPTION STRATEGY

DECEMBER 08

ANTI-FRAUD AND ANTI-CORRUPTION STRATEGY

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1. Introduction

- 1.1 The Authority recognises that as well as causing financial loss, fraud is also detrimental to the provision of services and damaging to the reputation of, and confidence in, the Authority and public bodies in general. Thus the Authority is committed to a culture that is one of honesty and opposition to fraud and corruption, and making sure that the opportunity for fraud and corruption is reduced to the lowest possible risk. The Authority will not tolerate fraud and corruption in the administration of its responsibilities from inside or outside of the Authority. Where fraud, corruption and other problems occur, the Authority will deal with it in a firm and controlled manner.
- 1.2 An important part of this approach is introducing and maintaining an effective Anti-Fraud and Anti-Corruption Strategy. This document provides an overview of the Strategy and includes detailed guidance on how the Authority will deal with allegations of fraud and corruption.
- 1.3 This strategy is applicable to GMPA members, GMPA staff, police officers of all ranks, GMP police staff and all external staff with whom GMPA conduct business. The Authority expects all applicable persons to be fair and honest, and to provide any help, information and support necessary to deal with fraud and corruption.
- 1.4 The Strategy set out in this document covers the following areas:
 - Authority/Force Policies, Procedures and Rules
 - Expected levels of behaviour
 - Definition of Fraud and Corruption
 - Preventing Fraud and Corruption
 - Raising a Concern
 - How allegations of Fraud and Corruption will be dealt with
 - Detecting and investigating Fraud and Corruption
 - Searches
 - Action to be taken against fraudsters
 - Awareness
 - Sharing Information
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 - Conclusion
 - Contact Details

2. Authority/Force Policies Procedures and Rules

2.1 There are a number of procedures and rules to make sure that the Authority's/Force's financial, working and organisational procedures are properly controlled. These are an important part of the internal control process, and it is important that all members, staff, police officers and police staff know about them. To ensure transparency, many of these documents are available to view on the Internet / intranet.

2.2 The most important of these are as follows:

- **Standing Orders**

These are the formal rules made by the Authority to regulate the conduct of business, including the making of contracts

- **Financial Regulations**

These provide the framework for managing the Authority's financial affairs

- **Chief Constable's Financial Instructions**

These are the formal rules that apply to the day to day financial management of the Force

- **Code of Conduct for Employees**

The code of conduct provides a framework for all employees in terms of official conduct

- **Code of Conduct for members of the Authority**

The code of conduct provides a framework for members of the Authority in terms of official conduct

- **Chief Constable's Orders**

These are the formal rules that apply to various aspects of the day to day management of the Force

- **Local Disciplinary Procedure and Rules**

This procedure sets out to address the action of employees who do not meet the expected standards of conduct or performance

- **Scheme of Delegation**

A listing of all the powers and duties that have been delegated to facilitate effective administration of the Authority

- **Employees' Conditions of Service**

- **Recruitment and Selection Procedures**

- **Procurement Policy and Strategy**

2.3 Individual sections/units within GMPA and the Force have also introduced their own measures designed to control their activities, which include accounting control procedures, working manuals and operating procedures.

- 2.4 GMP Divisional Commanders and Branch Heads must make sure that all staff have access to the relevant rules and regulations and that staff receive suitable training.
- 2.5 GMPA members and employees must make sure that they read and understand the rules and regulations that apply to them, and act in line with them.
- 2.6 Contravention of these rules and regulations may lead to formal action being taken against the parties concerned. This may include terminating employment with the Authority/Force in respect of employees/police officers and police staff, and referral to Standards Board in respect of members. It will be the responsibility of the Monitoring Officer to report matters to the Standards Committee.

3. Expected levels of behaviour

- 3.1 The Force/GMPA expects all people and organisations that are in any way associated with them to be honest, fair and act with integrity in their dealings with the Authority/Force, its clients and customers. Members, employees, police officers and police staff are expected to lead by example in these matters.
- 3.2 The Codes of Conduct for members, employees, police officers and police staff set out an approach to work that is both honest and fair. Members, employees, police officers and police staff must act in line with the codes at all times.
- 3.3 Members, employees, police officers and police staff have an important part to play in dealing with fraud and corruption, and the Authority encourages them to act if a case of fraud is suspected. Members have a responsibility to report to the Standards Committee if they have a concern relating to another member.
- 3.4 Members, employees, police officers and police staff must ensure that they avoid situations where there is potential for a conflict of interest. Such situations can arise with tendering and externalisation of services etc. Effective role separation will ensure decisions made are seen to be based on impartial advice.
- 3.5 All information will be dealt with fairly and confidentially. The Authority operates an independent whistleblowing hotline and advertises the number in the community. An undertaking is given not to reveal the callers' names (where given) who provide the information, unless required by legislation.
- 3.6 The Nolan Committee sets out the seven guiding principles that apply to people who serve the public. The Authority will develop our working behaviour around these principles, which are:

THE SEVEN PRINCIPLES OF PUBLIC LIFE (NOLAN COMMITTEE)

Selflessness

Holders of public office take decisions in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in their performance of their official duties.

Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership

Holders of public office should promote and support these principles by leadership and example.

- 3.7 The Executive Director to the Police Authority Services, GMP Divisional Commanders and Branch Heads are expected to deal firmly and quickly with anyone who is involved in fraud or corruption. The Head of audit, Audit and Risk Management Unit in consultation with the Chief Executive to the Police Authority may refer matters to the local police or the Professional Standards Branch if criminal activity is suspected.
- 3.8 The investigative process should not be misused and, therefore, any abuse, such as raising unfounded malicious allegations, will be dealt with as a separate disciplinary matter/Standards Committee if staff, police officers, police staff/members are involved.
- 3.9 Employees are advised and should understand that they must not be directly involved in the processing of any type of application for work, services or other matters relating to Authority business in which they or any close relative or friend, have a personal interest. In this event employees must inform their manager/immediate supervisor, as soon as they are aware of the application or matter in question, and a formal record will then be maintained.

4. Definition of Fraud and Corruption

4.1 *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"

4.2 *Corruption* is defined as:

"The offering, giving, soliciting or acceptance of an inducement or reward, which may influence the action of any person".

4.3 Fraudulent or corrupt acts may include:

<i>Systems Issues</i>	i.e. where a process/system exists which is prone to abuse by either employees or public, (e.g. misuse of PNC)
<i>Financial Issues</i>	i.e. where individuals or companies have fraudulently obtained money from the Authority, (e.g. invalid invoices/work not done)
<i>Equipment Issues</i>	i.e. where Authority/Force equipment is used for personal use, (e.g. personal use of Authority/Force telephones)
<i>Resource Issues</i>	i.e. where there is a misuse of resources, (e.g. theft of cash/assets)
<i>Other Issues</i>	i.e. activities undertaken by officers of the Authority/Force which may be: unlawful; against the Authority's Standing Orders or policies, falls below established standards or practices; or amounts to improper conduct, (e.g. receiving unapproved hospitality)

This is not an exhaustive list. Advice and guidance can be obtained from the Authority's Internal Auditor, if there is any doubt about the seriousness of concerns.

- 4.4 Concerns or allegations that fall within the scope of other existing procedures (e.g. child protection or discrimination issues) will normally be referred for consideration under those procedures.

5. Preventing Fraud and Corruption

- 5.1 The Force/GMPA recognises that fraud and corruption can be costly in terms of financial loss and reputational risk. The prevention of fraud and corruption is therefore a key objective.
- 5.2 In order to combat fraud and corruption, it must be prevented from happening in the first place. It is essential that there are clear rules and procedures, within which members, employees, police officers, police staff, consultants and contractors can work. These include the main Authority/Force policies, which are set out in section 2.
- 5.3 The Anti-Fraud and Anti-Corruption Strategy will be reviewed on an annual basis to reflect any amendments to the Authority's/Force's rules, or changes in legislation and working practices.
- 5.4 In order to raise awareness of the Strategy and fraud and corruption in general, GMPA will, in conjunction with other police authorities/local authorities/agencies where necessary, actively promote regular publicity campaigns. It will also issue instructions/advice aimed at encouraging fraud awareness and reminding individuals of their responsibilities.
- 5.5 This strategy will be available on the Internet and the Intranet, and disseminated throughout the Authority/Force.
- 5.6 Where appropriate, the Authority will publicise the results of any investigation to promote awareness, to deter, and to demonstrate the need for preventative measures.

- 5.7 The Executive Director to the Police Authority, GMP Divisional Commanders and Branch Heads must make sure that suitable levels of internal check are included in working procedures, particularly financial procedures. It is important that duties are organised so that no one person can carry out a complete transaction without some form of checking process being built into the system.
- 5.8 The Authority/Force recognises that a key preventative measure in the fight against fraud and corruption, takes effect at the staff recruitment stage. The taking up of references including vetting checks is an essential control in establishing as far as possible the honesty and integrity of potential staff, whether for permanent or temporary employment. The recruitment and selection procedures contain detailed guidance, which should be followed in connection with securing references.
- 5.9 The Authority is committed to working and co-operating with other organisations to prevent organised fraud and corruption. Wherever possible, the Authority will be prepared to help and exchange information with other police authorities and organisations to deal with fraud.
- 5.10 There are confidential facilities available for people to provide information that may prevent fraud and corruption. These include an independent dedicated telephone line, which staff and members of the public can use to provide information about specific issues.
- 5.11 Internal Audit will ensure that details of reporting facilities are widely published to the public, members and employees, police officers and police staff, and that all information received is dealt with appropriately.
- 5.12 As part of the Authority's overall arrangements to deter the occurrence of financial irregularities and fraud, Internal Audit, based on an annual audit plan:
- Review designated systems and highlight control weaknesses which could increase the possibility of fraud/irregularities
 - Carry out sample testing on transactions
 - Act as a visible deterrent when performing a range of audit duties
 - Use data retrieval techniques to identify possible instances of irregularities
 - Investigate cases of suspected irregularity
 - Liaise with relevant management to recommend changes in procedure to prevent further losses in the Authority/Force
 - Work with the Professional Standards Branch as required.

6. Raising a Concern

- 6.1 In essence, employees/officers should approach the relevant manager/senior officer who, if they find the claim to be substantiated, will inform the Treasurer to the Authority and the head of Audit, Audit and Risk Management Unit, The nature of the complaint will determine the Authority's course of action.
- 6.2 Members of the public are encouraged to report any concerns. The Audit and Risk Management Unit will review all concerns and consider whether an investigation, action or a referral is required.

- 6.3 Concerns are better raised in writing. The background and history of the concern, giving names, dates and places where possible, should be set out and the reason why the individual is particularly concerned about the situation. Those who do not feel able to put their concern in writing can telephone or meet the appropriate officer.
- 6.4 The Authority's Whistleblowing Policy (See Section 8) is intended to encourage and enable staff/officers to raise serious concerns within the Authority/Force rather than overlooking a problem or blowing the whistle to the media or other external bodies.
- 6.5 Although staff are not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for concern. The earlier the concern is expressed, the easier it is to take action.
- 6.6 Individuals may invite their trade union or professional association to raise a matter on their behalf.
- 6.7 The Authority encourages members of the public who suspect fraud and corruption to contact the Chief Executive to the Police Authority or Internal Audit in the first instance.
- 6.8 Internal Audit is a unit that operates independently of all other Authority/Force Services, whose work includes establishing procedures with the following aims:
- To develop an Anti-Fraud culture
 - To deter, prevent, detect and investigate fraud and corruption
 - To seek appropriate action against those who commit or seek to commit some sort of fraud or corruption
 - To seek compensation in respect of any losses to the Authority/Force.
- 6.9 If either a member of the public or an employee feel it is right to take the matter outside these processes, the following are possible ways forward:
- **A Police Authority Member** – members contact details are contained on the GMPA website
 - **The Audit Commission** – who are the organisation appointed to scrutinise the Authority's finances and performance. By law, they must be completely independent from the Authority.
 - **A Trade Union/Police Federation** – employees may invite their trade union to raise a matter on their behalf.
 - **The Police** – suspicions of fraud or corruption may be reported directly to the Police.
 - **Public Concern at Work** – this is a charity that provides free and strictly confidential legal help to anyone concerned about a malpractice that threatens the public interest.
- 6.10 If staff/police officers/police staff do take the matter outside the Authority, they need to ensure that they do not disclose confidential information.

7. How allegations of fraud and corruption will be dealt with by the Authority

- 7.1 For issues raised by employees/officers or members of the public, the action taken by the Authority will depend on the nature of the concern. The matters raised may:
- Be reviewed followed by an investigation by Internal Audit if appropriate
 - Be referred to the local police
 - Be referred to the Professional Standards Branch
 - Be referred to the External Auditor
 - Result in the discipline and/or prosecution of offenders where appropriate
 - Result in Recovering assets/income for the Authority/Force
 - Continue as an internal investigation in some instances whilst police action is being considered.
- 7.2 In those instances where the complainant has provided a contact name and address, the Chief Executive, designated officer, or GMPA's Internal Audit Team will write to the complainant to acknowledge receipt of the concern within 10 working days of the complaint having been received.
- 7.3 The amount of contact between the body considering the issues and the complainant will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from the individual.
- 7.4 When any meeting is arranged, the complainant has the right, if they so wish, to be accompanied by a trade union or professional association representative or a friend who is not involved in the area of work to which the concern relates.
- 7.5 The Authority will take steps to minimise any difficulties that staff/officers or members of the public may experience as a result of raising a concern. Full protection will be provided to the whistleblower under the Public Interest Disclosure Act. If staff/officers or members of the public are required to give evidence in criminal or disciplinary proceedings, the Authority will advise them about the procedure and offer the appropriate level of support.
- 7.6 The Authority accepts that those people who reported the alleged fraud or corruption need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, they will receive information about the outcomes of any investigation.

Prosecution Policy

- 7.7 The Authority/Force is committed to preventing fraud and corruption and has developed the Anti-Fraud and Anti-Corruption Strategy in order to minimise its occurrence.
- 7.8 The Authority/Force will constantly monitor its systems and amend procedures as required.
- 7.9 This procedure does not supersede other internal disciplinary codes implemented by the Authority/Force and internal offenders will be liable to general disciplinary procedures as well as prosecution.

7.10 The Authority's policy on fraud is to:

- Deter it in the first instance
- Detect it quickly
- Investigate it efficiently, and
- Discipline and/or prosecute offenders when appropriate.
- Recover assets/income for the Authority/Force

7.11 The Treasurer to the Police Authority will decide if reporting the matter to the local police or the Professional Standards Branch is appropriate.

7.12 In deciding whether a fraud should be reported to the local police or the Professional Standards Branch the following factors will be taken into account:

- Whether offender is a member, staff member, police officer or police staff
- The extent of the fraud/corruption in financial terms
- The sufficiency and appropriateness of evidence
- Whether the public interest will be served

7.13 In general, all cases will be reported to the local police or the Professional Standards Branch.

8. Detecting and investigating Fraud and Corruption

8.1 All employees should read this section in conjunction with the Prosecution Policy set out above and sections 5 and 6.

8.2 Under the Codes of Conduct for Members, employees, police officers and police staff any suspected cases of fraud and corruption should be reported to designated persons. Financial Regulations/Chief Constable's Financial Instructions require that members and employees/police officers and police staff must report any similar instances to the Treasurer to the Police Authority. Reporting cases in this way is essential for an effective Anti-Fraud and Anti-Corruption Strategy.

Whistleblowing

8.3 Employees are often the first to realise that there may be something seriously wrong within the Authority/Force. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Authority/Force. They may also fear harassment or victimisation. In these circumstances, it may seem easier to ignore the concern rather than report what may just be a suspicion of malpractice.

8.4 For some minor issues staff/officers should normally raise concerns with their immediate manager or their superior. In general, however, the Whistleblowing procedure is expected to be used for potentially more serious and sensitive issues (e.g. corruption, fraud) and the first step will be to report the matter on the confidential Whistleblowing hotline on 0808 100 1235.

- 8.5 The Authority is committed to the highest possible standards of openness, probity and accountability. In line with that commitment the Authority expects members, employees, police officers, police staff and others with serious concerns about any aspect of the Authority's work to come forward and voice those concerns. It is recognised that certain cases will have to proceed on a confidential basis. This Strategy document makes it clear that staff/officers can do so without fear of reprisals.
- 8.6 This Whistleblowing Policy is intended to encourage and enable staff to raise serious concerns within the Authority rather than overlooking a problem or blowing the whistle to the media or other external bodies. Employees reporting concerns in this way are afforded rights through legislation (Public Interest Disclosure Act 1998). This policy has been discussed with the relevant trade unions and professional organisations and has their support.

Aims and scope of the Policy

This policy aims to:

- provide avenues for staff/officers and members of the public to raise concerns and receive feedback on any action taken
 - inform how to take the matter further if they are dissatisfied with the response, and
 - reassure whistleblowers that they will be protected from reprisals or victimisation for Whistleblowing in good faith.
- 8.7 There are existing procedures in place to enable employees to lodge a grievance relating to their own employment. This Whistleblowing Policy is intended to cover concerns that fall outside the scope of other procedures. That concern may be about something that:
- is unlawful, or
 - is against the Authorities standing orders or policies, or
 - falls below established standards or practices, or
 - amounts to improper conduct.

Safeguards

- 8.8 **Harassment or victimisation** The Authority recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The Authority will not tolerate harassment or victimisation and will take action to protect staff/officers when they raise a concern in good faith. This does not mean that if a member of staff is already the subject of disciplinary or redundancy procedures, that those procedures will be halted as a result of their Whistleblowing. Members of the public will be protected by the guarantee of confidentiality as detailed below.
- 8.9 **Confidentiality** The Authority appreciate that some whistleblowers do not wish their identity to be disclosed and thus will not reveal the names of the people who provide the information, unless required by legislation.

8.10 **Anonymous allegations** This policy encourages employees to put their names to allegations. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of the Authority. In exercising this discretion, the factors to be taken into account would include:

- the seriousness of the issues raised,
- the credibility of the concern, and
- the likelihood of confirming the allegation from attributable sources.

8.11 **Untrue allegations** If employees make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, individuals make malicious or vexatious allegations, disciplinary action may be considered and implemented.

8.12 **The responsible officer** The Treasurer to the Police Authority has overall responsibility for the maintenance and operation of this policy, maintains a record of concerns raised and the outcomes, and will report as necessary to the Audit Committee.

9. Searches

9.1 Where there is a belief that somebody is concealing Authority or Force property they will be asked to give their permission to a search. This express consent will be recorded on a Permission to Search form, together with specific details of the person and/or the property to be searched. In addition, any specific requests should be recorded on the form. The line manager should countersign the form. The Authority/ Force will endeavour to fulfil any reasonable request. The employee will be asked if they wish to be accompanied by a colleague.

9.2 The search of a person and/or personal portable belongings will be performed in a private location. All searches will be undertaken by a person of the same gender to respect the person's dignity. Overcoat, hat and/or footwear may be requested to be removed, if appropriate. A person's racial, sexual or religious requirements will be respected at all times. All searches will be performed in the least invasive manner possible. Two people will be present, one to conduct the search and one to observe that proper precautions are taken.

9.3 A full written report should be made of the search including the date, time, names of people present, and the result of the search. If consent to a search is refused, the Police may be contacted in order that a legitimate search could be conducted. Inferences may be drawn in a disciplinary from the fact that the employee did not consent to a search. Prior to a search being performed, Internal Audit should be contacted for advice.

10. Action to be taken against Fraudsters

10.1 For all instances of fraud the action taken will follow the prosecution policy outlined in Section 7. Any suspected fraud by members will also be referred to the Standards Committee. The Audit Commission also has powers to request or carry out an investigation into fraud and corruption.

10.2 All Authority staff, police officers and police staff accused of internal malpractice and wrongdoing will be subject to a disciplinary investigation. All interviews performed as part of the investigation will be tape recorded using a dual tape machine. The interviewee will be provided with a copy of the tape on request. If it is

concluded that the matter should be dealt with under the disciplinary procedure, the individual will attend a hearing, where, if found guilty, they will receive a warning, sanction, or dismissal. Any member who is the subject of allegations of wrongdoing must be referred to the Standards Committee, who will determine what action should be taken. All contractors, consultants and organisations receiving funding from the Authority who are accused of wrongdoing will be the subject of an investigation. If proven, an independent decision will be taken or terminate the agreement/grant.

- 10.3 The appointed investigator will work with the Authority/Force to decide on the type and course of the investigation. This will include referring cases to the local police and the Professional Standards Branch where necessary. The Authority/Force's policy is to prosecute offenders and undertake disciplinary procedures where appropriate. It will be ensured that any internal proceedings do not prejudice any criminal case.
- 10.4 The recovery of defrauded money is an essential part of the strategy to emphasise that fraud does not pay. The fraudster will be asked to repay all money illegally obtained. If no agreement is forthcoming, court action will be instigated to recover the outstanding debt.
- 10.5 Police authorities/police forces are expected in all cases of fraud to actively consider applying a sanction or prosecution.
- 10.6 The Authority/Force is committed to tackling fraud and corruption within their organisations whenever it happens. The response will be effective and organised and will rely on the principles included in this document.
- 10.7 The Authority/Force will continue to review their rules and procedures and will make sure that this Strategy document is regularly reviewed to make sure it stays current and appropriate.

11. Awareness

- 11.1 The Authority understands that the key to maintaining an effective Anti-Fraud and Anti-Corruption Strategy will depend on programmed training and the way members, staff, police officers and police staff respond.
- 11.2 The Authority supports the idea of providing training for members, staff, police officers and police staff who are involved in managing or reviewing internal control systems, to make sure that their responsibilities and duties are regularly reviewed and reinforced.
- 11.3 The Authority/Force are committed to training and developing personnel who are involved in investigating fraud and corruption, and suitable training will be provided.
- 11.4 The Authority will ensure that any non GMPA/Force personnel paid to investigate fraud and corruption on their behalf have been adequately trained to undertake investigations.

12. Sharing Information

- 12.1 The Authority/Force is committed to working with other agencies in the detection and prevention of fraud. This information will be shared in accordance with the principles of the Data Protection Act (1998)
- 12.2 The Authority participates in national data sharing exercises, i.e. the National Fraud Initiative to enable the proactive detection of fraud.

13. Review Procedures

- 13.1 All completed investigations resulting from the Whistleblowing procedure are reported quarterly by Internal Audit to the Audit and Inspection Committee.
- 13.2 An annual report detailing the results of all completed investigations and any changes to procedure/introduction of controls will be prepared by Internal Audit for the Audit and Inspection Committee. This will enable lessons learned as a result of investigations to be disseminated as best practice across the Authority/Force.
- 13.3 The Anti-Fraud and Anti-Corruption Strategy will be reviewed on an annual basis and all associated procedures will be updated as required to take account of changes in legislation and best practice.

14. Conclusion

- 14.1 The Authority/Force is committed to tackling fraud and corruption within their organisations whenever it happens. The response will be effective and organised and will rely on the principles included in this document.
- 14.2 The Authority/Force will continue to review their rules and procedures and will make sure that this Strategy document is regularly reviewed to make sure it stays current and appropriate.

15. Contact Details

- ***The Authority's Internal Audit Team***

By phone on 0161 793 2830, or via the confidential freephone 24 hour hotline on 0808 100 1235

In writing to the Audit Manager, GMPA Internal Audit Team, Audit & Risk Management Unit, Civic Centre, Swinton, M27 6BY.

- ***Public Concern at Work –***

Helpline 0207 404 6609

E-mail - whistle@pcaw.demon.co.uk

- ***Member Services***

Contact on 0161 793 3021 for advice

Member contact details are contained on the GMPA website www.gmpa.gov.uk