

# WELSH GOVERNMENT FRAUD & CORRUPTION RESPONSE PLAN

**If you have a Suspicion of Fraud or Corruption**

**You MUST report it as soon as reasonably practicably**

**Do**

**Do Not**

**PREVENT**

- ❖ **Record key facts** e.g. dates, times, locations, names and keep secure;
- ❖ **Secure** any relevant documentation that you are in possession of or identify where it is held:

- ❖ **Ignore**;
- ❖ **Discuss** with anyone other than reporting officers below;
- ❖ **Investigate** yourself.

**Report All suspicion of fraud / corruption immediately to one of the below:**

- ❖ Head of Counter Fraud – Steve Tooby 03000 256408
  - ❖ Deputy Director Assurance – XXXXXXXXXXXXXXXXXXXX or
  - ❖ Member of the External Assurance Panel or Whistle Blowing Panel; and
  - ❖ Complete a summary of your suspicions attaching any documentary evidence;
- Confidentiality will be maintained at all times. You may also wish to report through whistleblowing procedures or via your trade union representative.**

**PURSUE  
&  
PROTECT**

- ❖ Your summary/suspicion will be considered by the relevant panel;
- ❖ You may be asked or choose to attend and present the suspicion or allegation;
- ❖ **External Fraud:**
- ❖ The policy area or department will have the responsibility/decision to continue or suspend funding; although advice may also be drawn from the EAP;
- ❖ Consider lessons and action that can be taken to stop/mitigate any weakness now;
- ❖ If the matter is to be overseen/ investigated by the Head of Counter Fraud you may be asked to assist and provide evidence in the investigation;
- ❖ The EAP needs to consider if early advice from Legal Services is required;
- ❖ The Head of Counter Fraud will gather evidence and exhibits and if there is a case to answer will produce an evidential package;
- ❖ Whoever is tasked by the EAP to lead will regularly update the EAP on progress.

**PREPARE**

**Criminal**

**Disciplinary**

**Recovery**

**No Further Action**

Criminality is suspected:

- Counter Fraud /IAS Investigates;
- Evidential package;
- Refer to the police.

If there is a breach of policy/procedure/ staff Terms and Conditions then it will go to HR.

Issue an invoice and seek recovery through claw-back or civil procedure.  
  
Advice from LS /Debt Team

If no case to answer it will be closed.  
  
If breach of Award letter and not criminal consider civil recovery/claw back.

## **'The 4 P's'**

<b>PREVENT</b>	<b>Challenge, report and stop people from committing fraud.</b>
<b>PURSUE &amp; PROTECT</b>	<b>Stop and deter fraud with zero tolerance by investigating and detecting fraud.  Strengthen protection against fraud, act now and strengthen weaknesses in controls immediately.</b>
<b>PREPARE</b>	<b>Take positive action to deter future attempts and debrief the case to learn lessons to mitigate further attempts.</b>