

Witness Name: **Catherine Crawford**

Statement no: **First**

Exhibits: **CC15**

Date: 29 February 2012

THE LEVESON INQUIRY

Exhibit CC15 to the
Witness Statement of **Catherine Crawford**

Metropolitan Police Authority: Website archive

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Good conduct and anti fraud policy

Introduction

1.1 Policy statement

The Metropolitan Police Authority is committed to a culture that is one of honesty, integrity and propriety in the holding of public office and the use of public funds. The Authority will not tolerate fraud and corruption in the administration of its responsibilities from inside or outside the Authority.

1.2 Application of this policy

This policy is applicable to Members of the MPA, police officers of all ranks, police staff and all external persons with whom the MPA conduct business. It also applies to MPA employees.

1.3 Relationship with other documents

A number of other documents within government and the MPA interface with this policy. This is the highest-level policy covering the MPA and MPS in relation to good conduct and fraud and corruption. Other policies that should be read in conjunction with this document include:

- Nolan /Graham Committee reports on Standards in Public Life
- [Code of Conduct for Members' of the MPA](#)
- [MPA Financial Regulations](#)
- [MPA Scheme of Delegation](#)
- [MPA Contract Regulations](#)

Part A - policy statement

2.1 Policy

This policy in relation to good conduct and fraud and corruption has been endorsed by members of the Metropolitan Police Authority and is set out below. The Authority requires that:

- Everyone observes the principles set out in the Graham Committee report on standards in public life (see Part E of this policy).
- Members, police officers, police staff and MPA officers at all levels will lead by example in demonstrating good conduct and ensuring compliance with legal requirements, rules, procedures and practices, including those relating to acceptance of gifts and hospitality and outside business interests.
- Members will conduct themselves in accordance with the spirit and letter of the Code of Conduct for Members' of the MPA.

- Senior officers of the MPA and MPS are required, in accordance with agreed procedures, to deal swiftly and firmly with those who defraud the Authority or are corrupt.
- Individuals and organisations such as suppliers, contractors, service providers that it conducts business with, will act towards the Authority with integrity and a total absence of fraudulent or corrupt practices.
- All police officers paid by the MPA and employees of the MPA, including police staff, have a duty to report any suspected fraudulent or corrupt practice affecting the MPA or the MPS to the appropriate line manager or senior officer at the earliest opportunity.
- Members have a duty to report any fraudulent or corrupt practice coming to their notice that may affect the MPA or the MPS to the MPA monitoring officer at the earliest opportunity.
- All fraud and corruption affecting the MPA or the MPS, including suspected cases, will be reported immediately to the Director of Audit, Risk and Assurance irrespective of whether the matter is the subject of a criminal investigation. The Treasurer will bring to MPA member attention those cases he regards as sufficiently serious so to do.
- In those cases where sufficient evidence is available, criminal or disciplinary action will be taken.
- Civil recovery (including civil court action) of funds lost by fraud and corruption will be considered in all established cases.
- Managers at all levels will ensure that effective procedures, practices and controls are in operation in their areas of responsibility to minimise the opportunities for fraud and corruption.
- Effective arrangements will be maintained to enable staff of the Authority to report confidentially suspected fraud, corruption or wrongdoing.
- The memorandum of understanding that exists between MPA Directorate of Audit, Risk and Assurance and the MPS Directorate of Professional Standards to facilitate effective action in responding to cases of suspected fraud and corruption is to be maintained.

Part B - responsibilities under the policy

3.1 General duty

It is expected that every Member, police officer, member of the police staff and MPA staff conduct themselves ethically at all times in respect of their duties and will act in accordance with the Authority's policy as set out in Part A of this document.

3.2 Managers

Managers at all levels, both police and staff, have duties laid to them in the policy, particularly:

- To ensure that the areas for which they are responsible have effective controls in place to minimise the risk of fraud, deter fraudsters and detect fraud when it occurs. Advice on control is available from Directorate of Audit, Risk and Assurance.
- Taking action when fraud is detected in accordance with this policy.
- Taking decisions on the basis of the Authority's fraud policy set out in Part A of this document.

3.3 Suppliers and contractors to the MPA and MPS

Suppliers and contractors are required to conduct their business with the Authority with integrity and honesty and a complete absence of fraudulent behaviour. This includes the offering of inappropriate gifts and hospitality to the Authority's staff.

3.4 MPA Directorate of Audit, Risk and Assurance (DARA)

DARA has the primary lead in formulating the Authority's policy and the response to suspected fraudulent activity within the MPA and MPS including raising awareness of fraud and proactive research into areas of potential fraud. Also for contact with the Audit Commission in relation to this policy. All suspected fraud and corruption must be reported to DARA at the first opportunity, irrespective of any criminal investigation into the matter. DARA are also responsible for compiling statistics in relation to fraudulent behaviour to meet the needs of the Audit Commission or others and responding to the Audit Commission's National Fraud Initiative.

Part C - code of practice

4.1 Corporate governance

The Authority is determined to maintain the highest standard of corporate governance in the conduct of its business. In line with other public bodies it requires that codes of practice are in place to guide all those involved in the Authority's business to conduct themselves appropriately at all times.

The published codes of practice are intended to provide practical advice on the standard of conduct that is expected. Failure to follow the guidance may result in disciplinary action being taken or in the case of Members, the matter being referred to the Standards Board for England.

4.2 MPA staff

MPA staff are required to conduct themselves to the same standard as staff under the control and direction of the Commissioner and as set in the codes of practice below.

4.3 codes of practice

Codes of practice for specific groups or issues can be found in the following documents, which are available on the MPS Intranet or MPA website:

- Members' Code of Conduct for the Metropolitan Police Authority
- Code of Conduct for Police Officers
- MPS Police Staff Personnel Manual or MPA Staff Handbook
- MPS Code of Practice for the Acceptance of Gifts and Hospitality
- MPA Staff Handbook

4.4 reporting fraud and wrongdoing

The above codes of practice and the MPS Professional Standards Strategy establish a telephone facility, the Right Line, for the confidential reporting of fraud and wrongdoing. Callers to the Right Line have an option of reporting fraud and wrongdoing to Directorate of Professional Standards for matters concerning police officers and Directorate of Audit, Risk and Assurance in respect of police staff or contractors. Whilst the source of calls to the Right Line is in certain circumstances identifiable, all callers are treated on a confidential basis and nothing will be disclosed without their knowledge. Police officers and staff reporting suspected fraud or wrongdoing can expect the standards of the MPS reporting wrongdoing policy to be met.

4.5 Public Interest Disclosure Act

In respect of fraud and wrongdoing that staff feel unable to report within the MPA and MPS, an external reporting arrangement will be maintained with the Independent Police Complaints Commission (IPCC) and details of how to contact the IPCC will be published.

Part D - fraud response plan

5.1 reporting fraud and wrongdoing

All fraud or wrongdoing will be reported and investigated in accordance with this plan. Fraud and wrongdoing may be reported either to a direct line-manager, another manager, via the Right Line or to the external reporting point of contact. Arrangements for reporting fraud or wrongdoing will be published within the MPS. All cases or suspected cases of fraud must be reported at the first opportunity to DARA, whether or not there is a police investigation.

5.2 detection and investigation

5.2.1 Managers becoming aware of fraud will ensure that the matter is reported and investigated. All fraud and corruption affecting the MPA or the MPS, including suspected cases, will be reported immediately to the Director of Audit, Risk and Assurance, irrespective of whether the matter is the subject of a criminal investigation.

5.2.2 A memorandum of understanding will be maintained between the Directorate of Professional Standards and Directorate of Audit, Risk and Assurance to ensure that all reported allegations of fraud are appropriately investigated.

5.2.3 When an allegation of fraud is made a senior manager will be appointed to oversee the proper and timely conduct of the investigation and subsequent action.

5.2.4 The investigation and any managers involved will take account of the Authority's policy on fraud set out in this document when determining the action to take.

5.2.5 The investigation conducted into allegations of fraud or wrongdoing shall take account of the requirements of the criminal law, discipline arrangements set out in Police Regulations and the police staff disciplinary procedures.

5.3 Liaison between Directorate of Professional Standards and Directorate of Audit, Risk and Assurance.

5.3.1 The MPS will consult with DARA when revising their policies and procedures for dealing with fraud and wrongdoing; who will ensure that they comply with the Authority's Financial and Contract Regulations and the policy set out in this paper.

5.4 Liaison between the Authority and others

5.4.1 Serious cases of fraud or wrongdoing will be reported to the Treasurer, who will determine if the matter has to be drawn to the attention of the Authority. In the event that a Member is involved, the matter will be reported to the MPA monitoring officer.

5.4.2 Directorate of Audit, Risk and Assurance will maintain a link with the Audit Commission in order to keep them apprised of developments in serious cases.

Part E – standards in public life

6.1 standards in public life

Members, police officers of all ranks, police staff, officers and staff of the MPA and all those engaged in a voluntary capacity supporting the MPA and MPS (e.g. special constables, ICVs etc) are required to observe the principles laid down by Parliament for all who serve the public in any way.

The ten general principles of public life:

1. **Selflessness** – holders of public office should serve only the public interest and should never improperly confer an advantage or disadvantage on any person.

2. **Honesty and integrity** – holders of public office should not place themselves in situations where their honesty and Integrity may be questioned, should not behave improperly, and should on all occasions avoid the appearance of such behaviour.
3. **Objectivity** – holders of public office should make decisions on merit, including when making appointments, awarding contracts, or recommending individuals for rewards or benefits.
4. **Accountability** – holders of public office should be accountable to the public for their actions and the manner in which they carry out their responsibilities, and should co-operate fully and honestly with any scrutiny appropriate to their particular office.
5. **Openness** – holders of public office should be as open as possible about their actions and those of their authority, and should be prepared to give reasons for those actions.
6. **Personal judgement** – holders of public office may take account of the views of others, including their political groups, but should reach their own conclusions on the issues before them and act in accordance with those conclusions.
7. **Respect for others** – holders of public office should promote equality by not discriminating unlawfully against any person, and by treating people with respect, regardless of their race, age, religion, gender, sexual orientation or disability. They should respect the impartiality and integrity of the authority's statutory officers and its other employees.
8. **Duty to uphold the law** – holders of public office should uphold the law and, on all occasions, act in accordance with the trust that the public is entitled to place in them.
9. **Stewardship** – holders of public office should do whatever they are able to do to ensure that their authorities use their resources prudently, and in accordance with the law.
10. **Leadership** – holders of public office should promote and support these principles by leadership, and by example, and should act in a way that secures or preserves public confidence.