Freedom of Information Act Publication Scheme	
Protective Marking	**Official**
Publication Scheme Y/N	Yes
Title	Anti-Fraud, bribery and corruption policy and Equality Impact Assessment (EIA)
Version	1.0
Summary	This policy sets out standards expected of MPS and MOPAC staff in respect of Anti-Fraud, bribery and corruption
(B)OCU or Unit, Directorate	Corporate Finance
Author	Corporate Finance
Review Date	May 2023
Date Issued	15 May 2019

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Application

When? This Policy applies with immediate effect.

Who? All police officers and police staff, including the extended police family and those working voluntarily or under contract to the Mayor's Office for Policing and Crime (MOPAC) or the Commissioner must be aware of, and are required to comply with, all relevant Metropolitan Police Service (MPS) policy and associated procedures.

Policy Principles

The public expect the highest possible standards of all employees in public service. The Mayor's Office for Policing and Crime (MOPAC) and the Metropolitan Police Service (MPS) expect staff and officers at all levels to lead by example, act with honesty and integrity and ensure adherence to legal requirements, rules, policies and practices. Everyone who serves in MOPAC and MPS must be aware that they have to uphold and demonstrate high ethical standards of behaviour. MOPAC and the MPS will not tolerate fraud, bribery and corruption in the conduct of their business and all employees have a duty/responsibility as defined by the Code of Ethics to report any reasonable suspicions, including all the associated facts promptly and accurately.

All members of the MPS and MOPAC (including commercial partners) have a duty;

- to report any suspected fraudulent or corrupt practices; and
- to protect the assets of the MOPAC/MPS, which includes information as well as all MOPAC and MPS property

Where employees have reasonable suspicions that fraud and/or corruption has taken place then they should advise the appropriate person. This may be their Line Manager, Head of Department and Senior Managers. Alternatively they may contact the Directorate of Professional Standards (DPS), local Professional Standards Champion or the Directorate of Audit, Risk and Assurance (DARA). They should then be prepared to co-operate in any subsequent investigation. All employees can do this in the knowledge that such concerns will be treated in confidence and will be properly investigated.

Purpose and Benefits

The policy, strategy and response plan supports the Commissioner and the Mayor of London in discharging their responsibilities for ensuring proper financial practice and adherence to all codes of ethics and standards, protections of the assets of the organisation and avoid any suspicion of impropriety.

Health and Safety Impact Statement

Both MOPAC and the MPS are committed in ensuring genuine concerns can be raised without fear of victimization, harassment, discrimination or disadvantage the individual raising the allegation or the individual subject to the allegation. The Public Interest Disclosure Act (PIDA) provides protection for employees, making it automatically unfair to dismiss or otherwise penalise for making “protected disclosure”.

During any investigation all parties will be treated fairly and receive the appropriate support whilst the investigations in underway.

The policy does not directly impact on the health and safety of Police Officers, Special Constable, volunteers and staff employed by or under the direction and control of the Commissioner.

Associated Documents and Policies

- Anti-fraud, bribery and corruption strategy
- Anti-fraud, bribery and corruption response plan
- Chief finance officer’s instructions
- Gifts and hospitality
- Business interest policy
- Register of interests
- Whistleblowing and reporting wrongdoing policy
- Standards in public life – the Nolan principles
- Code of ethics
- Scheme of Devolved Financial Management

- MOPAC Scheme of Consent and Delegation
- MOPAC Financial Regulations
- MOPAC Contract Regulations

Notices to be Cancelled / Amended

None

Equality Impact Assessment

Research and consultation	
Review of research	The following documents were reviewed: • Chartered Institute of Public Finance and Accountancy (CIPFA) Guidance – Code of Practice on Managing Risk of Fraud and Corruption, • Greater London Authority (GLA) - Anti-Fraud and Corruption Policy and Response Plan, • Greater Manchester Police - Anti-Fraud and Anti-Corruption Strategy, and • Cabinet Office – Eliminating Public Sector Fraud.
Internal consultation	Directorate of Professional Standards. Safety and Health Risk Management, Directorate of Strategy and Governance, Directorate of Audit, Risk and Assurance and Directorate of Commercial Services
External consultation	External consultation was carried out with the Mayor's Office for Policing and Crime (MOPAC)
Protected characteristics (Equality Act 2010)	
Summary of Equality Impact assessment	The policy provides an overview of the arrangements in place to develop and maintain and anti-fraud, bribery and corruption culture within the MPS, which encourages prevention, promotes detection and provides an effective process for reporting and investigating suspected acts of fraud.
Age	No impact has been identified on people from this protected characteristic at this stage
Deaf/disability	No impact has been identified on people from this protected characteristic at this stage
Gender reassignment	No impact has been identified on people from this protected characteristic at this stage
Pregnancy and maternity	No impact has been identified on people from this protected characteristic at this stage
Race	No impact has been identified on people from this protected characteristic at this stage

Religion or belief	No impact has been identified on people from this protected characteristic at this stage
Sex	No impact has been identified on people from this protected characteristic at this stage
Sexual orientation	No impact has been identified on people from this protected characteristic at this stage
Other issues	There are no issues identified at this stage
Monitoring	
12 month implementation plan	This policy will be monitored by the Fraud Forum, which is made up of representatives from Directorate of Audit Risk and Assurance, Commercial Finance, Risk Assurance, Directorate of Professional Standards and Commercial Services.