



**POLICE & CRIME
COMMISSIONER**
for Leicester,
Leicestershire & Rutland
Your Communities - Your Commissioner



Joint Anti-fraud, Bribery and Corruption Policy

Title:	Joint Anti-Fraud, Bribery and Corruption Policy
Purpose:	The aim of this policy is to prevent fraud and corruption within Leicestershire Police and the OPCC, assisting individuals and their line managers in ensuring that their actions can withstand scrutiny. The policy also provides an overview of our response to any incidents of fraud or corruption.
Author:	OPCC Chief Finance Officer
Other Relevant Legislation:	Human Rights Act 1998 (in particular A.14 Prohibition of discrimination) Equality Act 2010 Crime and Disorder Act 1998 H&S legislation Data Protection Act 2018 Freedom Of Information Act 2000
Other Relevant Policies/procedures:	Business Interests and Additional Occupations Gifts, Gratuities and Hospitality Whistleblowing Anti Money laundering Code of Ethics Code of Conduct
Security Classification:	Policy to be published on Intranet: Yes Policy to be published on Leicester Police Website and PCC website: Yes
Responsible Officers:	PCC Chief Finance Officer (PCCCFO) CC Chief Finance Officer (CCCFO)
Target Audience:	All Staff Agency and Partnership Staff Third Party Organisations and Suppliers
Date:	23 rd September 2024
Review Date:	23 rd September 2026

1. Introduction

- 1.1. Fraud, bribery and corruption can have a severe impact on the operation, status and reputation of an organisation, particularly the Office of the Police and Crime Commissioner for Leicester, Leicestershire and Rutland (OPCC) and Leicestershire Police and should therefore be opposed at every opportunity.
- 1.2. The Police and Crime Commissioner (PCC) for Leicester, Leicestershire and Rutland and Leicestershire Police are committed to a culture of honesty, integrity and propriety in the holding of public office and the use of public funds.
- 1.3. Fraud, bribery and corruption are an ever-present threat to our organisations. They undermine our ability to police in a professional and cost-effective way and may affect the way we utilise our finite resources. Neither the Leicestershire Police nor the PCC will tolerate fraud, bribery or corruption in the administration of our responsibilities, whether they are from inside or outside our organisations. Both will seek to apply all available sanctions, including civil, criminal, and disciplinary in the case of fraud or corruption being identified. The current world economic climate is putting pressure on our society and there is an ever-growing need to be robust in deterring and detecting fraud and corruption within the organisations. There is untold damage that can be caused to our reputation by any of our employees being involved in fraud or corrupt practices, as it can be seen by our public as a diversion of public funds for personal gain.

2. Aims and Objectives

- 2.1. The aim of this policy is to prevent fraud, bribery and corruption within Leicestershire Police and the OPCC. The policy will assist individuals and their line managers in ensuring that their actions can withstand scrutiny. The policy also provides an overview of our response to any incidents of fraud or corruption. The overall aim is to maintain the reputation and integrity of Leicestershire Police and the PCC.

3. Scope

- 3.1. The integrity of the force has a massive impact upon public confidence. In order to discharge its duties to the public members of the organisation need to act within the national policing Code of Ethics.
- 3.2. The introduction of The Bribery Act 2010 places an obligation on the organisation to have in place policies that ensure all transactions it undertakes are carried out with integrity.
- 3.3. This policy will go some way to address the standards expected and should be read in conjunction with
 - The Business Interest and Additional Employment Policy
 - The Gifts and Hospitality Policy
 - Anti-money Laundering Policy,
 - Whistleblowing Policy/Confidential Reporting Procedure
 - National Policing Code of Ethics
 - Code of Conduct Policy
 - Corporate Governance Framework (including Financial Regulations)

- 3.4. The Criminal Justice and Courts Act 2015 introduces legislation to bring criminal prosecutions against police officers who have acted corruptly.
- 3.5. Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) conducts inspections of the anti-corruption capability of police forces in England and Wales including the ability of professional standards departments to gather regular, actionable, intelligence on corruption matters.
- 3.6. Integrity is part of the core values of policing and its importance is made clear to every officer and staff. At the beginning of their service, a police officer is required (Police Act 1996, section 29) to make an attestation to serve with fairness, integrity, diligence and impartiality.
- 3.7. More generally, the importance of integrity is reinforced in a number of ways, including through The Police (Conduct) Regulations 2020 standards of professional behaviour, the Police Staff Council (PSC) standards of professional behaviour, the Code of Ethics, the OPCC Code of Conduct, and HR/PSD procedures.
- 3.8. The Code of Ethics makes clear that any form of unprofessional behaviour up to and including criminal and corrupt behaviour not only detracts from the service that the police provide to victims of crime and the public, it also risks losing public trust and confidence in the police.
- 3.9. This policy applies to ALL persons employed by Leicestershire Police and the OPCC - Police Officers, Police staff, Volunteers, the OPCC, other commercial partner(s) staff and all external persons with whom the PCC and the Chief Constable conducts business.

4. Key Legislation

4.1. Fraud Act 2006

- 4.1.1. The Act provides a statutory definition of the criminal offence of fraud, as classified under three main headings:
 - Fraud by false representation – dishonestly and knowingly making an untrue statement with the intention of making a gain or causing another to make a loss. This includes anything said, written or entered into a system or device.
 - Fraud by (wrongfully) failing to disclose information – dishonestly failing to disclose information that should legally be disclosed with the intention of making a gain or causing another to make a loss; and
 - Fraud by abuse of position – someone in a post in which they are expected to protect the interests of another dishonestly doing something or failing to do something with the intention of making a gain or causing another a loss. Those found guilty under the Act are liable for a fine or imprisonment, with a maximum custodial sentence of ten years.

4.2 Bribery Act 2010

- 4.2.1 Corruption is defined as “the offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person”. The Act strengthened UK anti-bribery and corruption legislation and created a new offence which can be committed by organisations which fail to prevent persons associated with them from committing bribery on their behalf. Offering and requesting a bribe for financial or other advantage does not have to go direct to the person being influenced and there is no materiality threshold in the Act.

Individual offences under the Act are as follows:

- Bribing another person
- Receiving a bribe, and
- Bribery of foreign public officials

4.3 Theft Act 1968

- 4.3.1 The basic definition of theft under the Act is that “a person is guilty of theft if s/he dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it; It is immaterial whether the appropriation is made with a view to gain or is made for the thief’s own benefit.” Those found guilty under the Act are liable for a fine or imprisonment, with a maximum custodial sentence of seven years.

5 Responsibilities

5.1 Police and Crime Commissioner and Chief Constable

- 5.1.1 The Corporate Governance Framework sets the responsibility of the PCC and Chief Constable (CC) in relation to fraud, bribery and corruption. It is the responsibility of the PCC and CC to maintain an effective anti-fraud, anti-corruption and anti-money laundering policy. It is also the PCC and CC responsibility to maintain a whistle blowing policy to provide a facility that enables employees, the general public and contractors to make allegations of fraud, misuse and corruption in confidence, and without recrimination, to an independent contact.

5.2 Chief Finance Officers

- 5.2.1 The OPCC Chief Finance Officer (PCCCFO) has statutory duties and overall responsibility for the financial administration of the PCC. The statutory responsibilities of the Leicestershire Police CFO (CCCFO) are largely identical to those of the CFO of the PCC. These statutory responsibilities are set out in s.151 of the Local Government Act 1972, s.112 of the Local Government Finance Act 1988, paragraph 6(1)(b) of Schedule 1 of the Police Reform & Social Responsibility Act 2011 (PCC), paragraph 4(1) of Schedule 2 of the Police Reform & Social Responsibility Act 2011 (FCFO), the Financial Management Code of Practice issued under section 17 of the Police Reform and Social Responsibility Act 2011 and the Accounts and Audit (England) Regulations 2015.
- 5.2.2 Both the PCCCFO and CCCFO must therefore be informed of any initial report, giving rise to any suspected fraud or corruption.

5.3 Senior Officers and Senior Managers

- 5.3.1 Senior officers and senior managers of the organisations are required to deal swiftly and firmly with those who defraud or who are corrupt. They have processes in place to prevent fraud and corruption.
- 5.3.2 Senior officers and senior managers of the organisations will ensure that effective procedures, practices and controls are in operation in their areas of responsibility to minimise the opportunities for fraud and corruption.
- 5.3.3 Senior officers and senior managers should ensure there are effective arrangements maintained to enable staff to report confidentially suspected fraud, corruption or wrongdoing.

5.4 All Staff

- 5.4.1 All members of the OPCC and Leicestershire Police (including commercial partners on business for Leicestershire police) have a duty to report any suspected fraudulent or corrupt practice affecting the PCC or Leicestershire Police at the earliest opportunity. All suspected instances should be reported immediately (in line with the Confidential Reporting Procedure) to your line manager or direct to the Professional Standards Department or this can be done anonymously via the 'Bad Apple' reporting process or through the Crimestoppers Police Integrity Line (<https://forms.theiline.co.uk/the-police-integrity-line>).
- 5.4.2 Suspected fraud or corruption alleged to have been committed by an OPCC officer or a contractor should be immediately reported to the OPCC Chief Executive or, in the case of an allegation being made about the Chief Executive, to the OPCC CFO.
- 5.4.3 The PCC and the Leicestershire Police will demonstrate that it is creating a strong deterrent effect by publicising successful cases of fraud and corruption and any successful recovery of losses.
- 5.4.4 Staff 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.

5.5 Suppliers and Contractors

- 5.5.1 Individuals and organisations such as suppliers, contractors, service providers that the PCC and Leicestershire Police conducts business with, will act towards the PCC and Leicestershire Police with integrity and a total absence of fraudulent or corrupt practices. This includes the offering of inappropriate gifts and hospitality to the PCC staff.

5.6 Member of the Public

- 5.6.1 Members of outside bodies and members of the public are also encouraged to report any suspected fraudulent or corrupt behaviour.
- 5.6.2 In those cases where sufficient evidence is available, criminal and/or disciplinary action will be taken by the organisations. Civil recovery (including civil court action) of funds lost by fraud and corruption will be considered in all established cases.

6 Motivators/Driving Forces

- 6.1 The prevention of Fraud and Corruption is an essential element in maintaining the reputation of the Leicestershire Police and the PCC. Both organisations need to ensure that through their policies and procedures, behaviours that affect the integrity and reputation of Leicestershire Police and OPCC are highlighted and addressed appropriately.
- 6.2 The Bribery Act 2010 requires organisations to have in place adequate procedures to prevent bribery occurring.

7 Policy

- 7.1 The OPCC and Leicestershire Police Anti-Fraud, Bribery and Corruption Policy is support by and should be read in conjunction with a series of inter-related procedures set out in section 3.3 that provides a framework to address fraudulent activity.
- 7.2 The PCC and CC are committed to an effective anti-fraud and corruption strategy based around the following strands:
- Culture
 - Prevention
 - Detection and Investigation
 - Training
 - Monitoring
- 7.3 There is a high level of external scrutiny of organisational affairs by a variety of bodies including:
- HMICFRS
 - External Audit
 - HM Revenue and Customs
 - Internal Audit
 - Local Communities
 - The Media
 - The Joint Audit, Risk and Assurance Panel (JARAP)
- 7.4 Application of this policy applies to the Chief Constable, all officers and staff employed by the Chief Constable, the PCC, Deputy PCC and all officers engaged in carrying out duties of the PCC. Detection, prevention and reporting of fraud and corruption are the responsibility of the Chief Constable, the PCC, Deputy PCC and the OPCC. The PCC and Chief Constable offer reassurance that any concerns will be treated in confidence and properly investigated without fear of reprisal or victimisation. All suspected fraud and corruption will be investigated in accordance with this policy.
- 7.5 Culture
- 7.5.1 The OPCC and Leicestershire Police promote a zero-tolerance approach towards fraud, bribery, corruption, and other malpractice for personal gain.

- 7.5.2 The Chief Constable and PCC are determined that the culture and tone of the organisation is one of honesty and integrity and opposition to fraud and corruption.
- 7.5.3 There is an expectation and requirement that all individuals and organisations associated in any way with the PCC and Chief Constable will act with integrity and both will lead by example in these matters. All staff are positively encouraged to raise any concerns they may have as it is often the alertness of such individuals that enables detection to occur and the appropriate action to be taken against fraud or corruption. Concerns may be about something that:
- Is unlawful
 - Is against the organisation's Standing Orders or policies
 - Falls below established standards or practices
 - Results in waste or loss to the organisation
 - Amounts to improper conduct.
- 7.5.4 The Chief Executive and DCC (delegated to Head of Professional Standards Department) is responsible for following up any allegation or suspicion of fraud or corruption received and will do so through clearly defined procedures. These procedures are designed to:
- Deal promptly with the matter
 - Record all evidence received
 - Ensure that evidence is sound and adequately supported
 - Ensure security of all evidence collected
 - Notify relevant bodies
 - Implement disciplinary procedures where appropriate.
- 7.5.5 If necessary, a route other than a normal line manager may be used to raise such issues. Examples of such routes are:
- OPCC CFO or Leicestershire Police CFO
 - OPCC Chief Executive & Monitoring Officer
 - Internal / External Auditors
 - Staff Associations
 - Bad Apple confidential reporting process.
 - Direct to the Anti-corruption Unit (Professional Standards Department)
- 7.5.6 There may be circumstances where a person may prefer to contact an external agency through the following contacts:
- Government fraud helplines (see www.gov.uk)
 - Public Concern at Work – independent whistleblowing charity offering free advice on fraud or other issues of malpractice
 - Crimestoppers Police Integrity Line
- 7.5.7 If a person decides to take the matter outside the organisation, they should ensure that they do not disclose official, secret or top secret information.
- 7.5.8 Members of the public are also encouraged to report concerns through any of the above avenues or through the Professional Standards Department or the Independent Office of Police Conduct (IOPC).

7.5.9 Allegations/concerns can be made anonymously; however, it should be noted that such cases can be more difficult to investigate. The likelihood of action will depend on:

- The seriousness of issues raised
- Credibility of the concern
- Likelihood of confirming the allegation from attributable sources.

7.5.10 It is important to note that any 'whistleblower' is protected in law (Public Interest Disclosure Act 1998) from detrimental treatment or victimisation by their employer after they have made a qualifying disclosure – given that they have done so in good faith.

7.6 Prevention

7.6.1 The PCC and Chief Constable recognise that a key preventative measure in the fight against fraud and corruption is to take effective steps at the recruitment stage to establish, as far as possible, the previous record of potential staff, in terms of their propriety, integrity and honesty. In this regard temporary and contract staff should be treated in the same manner as permanent staff. Vetting and security clearance are therefore a prerequisite to appointment.

7.6.2 The police or OPCC, like all organisations, may also suffer from an attempted fraud by an external party (e.g. submission of a fraudulent invoice); or an external person pretending to be a Leicestershire Police official and issuing payment instructions. Staff should be alert to the potential for such fraud and review systems and processes to prevent any that may be attempted.

7.6.3 The PCC and Chief Constable are committed to working and co-operating with other organisations to prevent organised fraud and corruption. Wherever possible, the PCC and Chief Constable will be prepared to help and exchange information with other PCCs, forces and organisations to deal with fraud.

7.6.4 The PCC and Chief Constable will assess the possibility of fraud within their risk management processes. This will include consideration of the following:

- Three key fraud risk factors (opportunity, motive and rationalisation)
- Likelihood, significance and pervasiveness of fraud risks
- The risk of management over-ride of control
- Mitigating programmes and controls to each identified fraud risk.

7.6.5 The organisations are committed to raising the awareness of the key fraud risks with appropriate staff.

7.6.6 All employees are expected to follow the Code of Conduct, any Code of Conduct related to their personal professional qualifications and also to abide by the College of Policing Code of Ethics (which incorporates the seven Nolan Principles as set out by the Committee on Standards in Public Life, and as extended by the principles of Fairness and Respect). As well as abiding by the aforementioned principles, the OPCC and Leicestershire Police also seeks to develop its working behaviour to support good governance as set out in the International Framework for Good Governance in the Public Sector. Compliance with this framework is reported as part of the Annual Governance Statement. This policy, and the role that appropriate staff

are expected to play in the organisation's framework of internal control, will be featured in staff induction procedures.

- 7.6.7 The PCC, Deputy PCC and staff are also required to declare in a public register any offers of gifts or hospitality which are in any way related to the performance of their duties in relation to the organisation. The Register will be held by the Chief Executive and made available to the public on request.
- 7.6.8 Chief officers, the senior leadership teams and all staff working for the OPCC and Leicestershire Police are required to comply with Gifts, Gratuities & Hospitality Procedure. The register will be held by Professional Standards or Chief Executive. It is periodically published for public access and is available for inspection.
- 7.6.9 Significant emphasis has been placed on the thorough documentation of financial systems, and every effort is made to continually review and develop these systems in line with best practice to ensure efficient and effective internal controls. The adequacy and appropriateness of the organisation's financial systems is independently monitored by both internal and external Audit. Senior management places great weight on being responsive to audit recommendations.
- 7.6.10 Arrangements are in place to continue to develop and encourage the exchange of information between the PCC, police force and other agencies on national and local fraud and corruption activity in relation to PCCs and police forces.

7.7 Detection and Investigation

- 7.7.1 The internal control systems within the organisation have been designed to provide indicators of any fraudulent activity and also to deter fraud.
- 7.7.2 It is the responsibility of management to prevent and detect fraud and corruption (albeit that, as noted in 7.5.3, it is often the alertness of staff and the public that enables detection to occur and the appropriate action to take place when there is evidence that fraud or corruption may have been committed or is in progress). All managers and supervisors should ensure that controls are in place to prevent and detect fraud and error.
- 7.7.3 There is a need to be aware of the possibility of fraud when reviewing or presented with, for example, claims, forms, and documentation. Issues that may give rise to suspicions or allegations are:
- Documents that have been altered, use of correction fluid, or different pens and different handwriting.
 - Claims that cannot be checked, particularly if prior authorisation was not given.
 - Confused, illegible text and missing details.
 - Delays in documentation completion or submission.
 - Lack of vouchers or receipts to support claims.
- 7.7.4 With the increasing use of electronic based systems which can rely on "self-certification" for making claims the onus is on individuals to submit correct claims supported by relevant documentation and appropriately authorised.
- 7.7.5 Both organisations participate in the National Fraud Initiative data matching and investigations work. Where any instances of fraud or overpayment are identified,

action is taken in line with Action Response Plan to recover any losses. Where any loss is incurred to fraud and corruption each organisation will take action to affect maximum recoveries

- 7.7.6 The relevant misconduct/disciplinary procedure concerning the suspected individual will be initiated where the outcome of the investigation indicates improper behaviour. In addition, civil legal action may be taken for the recovery of money or property misappropriated from the organisation.
- 7.7.7 The investigation shall take account of the requirements of the criminal law and advice should be sought from the Legal Services Department at the earliest opportunity to determine whether the alleged act may constitute a criminal offence.
- 7.7.8 Where an allegation of fraud or corruption is made against a Leicestershire Police Officer, Police Community Support Officer (PCSO) or retained support staff the details will be forwarded to the Professional Standards Department for investigation. Dependent on the allegation a decision will be made by the appropriate authority whether to suspend the individual whilst any investigation is ongoing.
- 7.7.9 The external auditor for the PCC and WMP will be informed by the Head of Internal Audit of all major incidents of fraud or financial impropriety and on occasion it may also be necessary to inform other organisations such as HM Revenue and Customs and the Department of Work and Pensions.
- 7.7.10 Details of investigations of fraud will be reported to the Joint Audit, Risk and Assurance Panel (JARAP). The Professional Standards Department (PSD) may also consider pension forfeiture and make an application to the Office of Police and Crime Commissioner (OPCC) for this is to be progressed.

7.8 Training

- 7.8.1 The organisations recognises that the continuing success of its Anti-Fraud and Corruption Policy and its general credibility will depend largely on the effectiveness of programmed training and the responsiveness of the Chief Constable, PCC, Deputy PCC and of employees throughout the organisation. To facilitate this, the PCC and Chief Constable support the concept of induction and training and appraisal and development for employees, particularly those involved in internal control systems, to ensure that a thorough understanding of their responsibilities and duties in this respect are regularly highlighted and reinforced. Heads of Departments and other line managers should ensure that employees have access to the relevant rules and regulations and that they receive suitable training. Employees must make sure that they read and understand the rules and regulations that apply to them and act in accordance with them. Employees who do not comply with these rules and regulations risk disciplinary action being taken against them.
- 7.8.2 The possibility of disciplinary action against staff who ignore such training and guidance is made clear. Mandatory training on counter corruption is provided via the College of Policing e-learning system.

7.9 Monitoring and Review

- 7.9.1 Monitoring and auditing is essential to ensure that controls are appropriate and robust enough to prevent or reduce fraud. The PCCCFO will monitor the operation of this policy and the application of controls, which will form part of the Internal Audit work plan, and will report any non-compliance to the PCCCFO and CCCFO in the first instance.
- 7.9.2 Continued failure to implement this policy should be reported by the PCCCFO to the JARAP.
- 7.9.3 The PCCCFO, Monitoring Officer and Head of Professional Standards will meet on a regular basis to discuss any instances or threats of fraud, bribery or corruption.
- 7.9.4 All employees should be made aware of this policy and have clear access to it via the Intranet. The policy should be highlighted in all induction training and documentation for new employees and staff working in partnership or agency arrangements. The attention of contractors and suppliers of goods and services should be drawn to the requirements of the policy.
- 7.9.5 The policy will be formally reviewed by the PCCCFO on a bi-annual basis.
- 7.9.6 Fraud, Bribery and Corruption is a standing item on the JARAP agenda and reported on an annual basis.

8 Fraud Response Plan

- 8.1 All managers, staff, third parties and other parties must report suspicions allegations of fraud. Fraud and corruption may be reported through a range of channels including direct to a line manager, direct to the Professional Standards Department or this can be done anonymously via the "Bad Apple" reporting process or through the Crimestoppers Police Integrity Line. Reports could also be made through the OPCC CFO or CEO.
- 8.2 A suspicion is reported to the Head of PSD or OPCC Chief Executive. The PCC Chief Finance Officer must immediately be notified of any suspected fraud, theft, irregularity, improper use or misappropriation of property or resources. Pending investigation and reporting, the CC Chief Finance Officer should take all necessary steps to prevent further loss and to secure records and documentation against removal or alteration.
- 8.3 The Head of PSD (or OPCC Chief Executive if relating to OPCC Staff) will review each suspicion or allegation to determine whether or not an investigation is required. Where appropriate, the Head of PSD will liaise with the PCC Chief Finance Officer and CC Chief Finance Officer to agree the type of investigation required (i.e. criminal or disciplinary) and liaise with Internal Audit, HR and Legal Services. The Appropriate Authority will report all allegations received to the PCC Chief Finance Officer, including the action to be undertaken. The Head of PSD will report progress in respect of each case to the PCC Chief Finance Officer on a monthly basis.
- 8.4 The Head of PSD will arrange for criminal investigations to be undertaken by an appropriately skilled investigator in all cases where fraud is suspected, which is likely to result in prosecution. Where allegations are founded but unlikely to result in a

prosecution, the Head of PSD will arrange for disciplinary investigations to be undertaken by an appropriately skilled investigator.

- 8.5 Where cases are proven, the Head of PSD will agree with the PCC Chief Finance Officer and CC Chief Finance Officer, the sanctions and redress to be sought. Where the case is not proven, the case should be formally closed and an internal report provided to the PCC Chief Finance Officer and CC Chief Finance Officer. Welfare support should be provided to individuals in accordance with the circumstances of each specific case.
- 8.6 Where financial impropriety is discovered the presumption of the PCC and the Chief Constable is that these arrangements will be made where appropriate for the prosecution of offenders by the CPS. In instances where the misconduct takes another form, such as the misuse of systems and equipment that does not result in financial loss, then the outcomes will be monitored by the PCC and the Chief Constable through the processes in place to oversee Human Resources issue.
- 8.7 The PCC and the Chief Constable will seek to ensure that it learns lessons from any mistakes made that allowed any instances of fraud or corruptions to be perpetrated or to have gone unnoticed. This will be achieved by ensuring that system weaknesses or other contributory factors are identified and addressed. This will normally be achieved through an Internal Audit investigation, report and action plan to ensure that audit recommendations are implemented.
- 8.8 The External Auditor also has the powers to investigate fraud and corruption independently and the PCC and the Chief Constable will make use of these services in appropriate cases.
- 8.9 The PCC Chief Finance Officer and the CC Chief Finance Officer will determine if a matter needs to be brought to the attention of the Chief Executive, PCC and the Chief Constable.
- 8.10 In the event that the PCC or the Chief Constable is involved the matter will be brought to the attention of the Monitoring Officer.
- 8.11 The PCCCFO and the CCCFO will maintain a link with the External Auditors in order to keep them apprised of developments in serious cases.