



**Prison
Service
Order**

**ORDER
NUMBER
1310**

Anti-Fraud Strategy

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	This replaces the previous version of PSO 1310 issued in October 2004.
PSI amendments should be read in conjunction with the PSO	
Date of Further Amendments	

EXECUTIVE SUMMARY

STATEMENT OF PURPOSE
<p>This PSO covers the Prison Service Anti-Fraud Strategy and the Fraud Response Plan. All members of staff and need to know what action to take and where to report fraud.</p>
DESIRED OUTCOME
<p>The Policy is easily available to all staff and explains in a way that is easily understood what action they must take if they suspect fraud.</p>
MANDATORY ACTIONS
<p><i>All allegations of fraud must be investigated. Where appropriate the Police must be informed. Action must be taken where fraud is proved.</i></p> <p><i>Investigations into allegations of fraud and theft must use the appropriate HM Treasury definition and the value of loss to the Prison Service established.</i></p> <p><i>The risk of fraud must be regularly reviewed as part of managers' overall assessment of business risk. Steps that managers must take are described at Appendix B.</i></p> <p><i>All staff who suspect fraud or theft must report it either to their line manager or to the Fraud hotline (0207 217 8804) or, alternatively, to Professional Standards Unit - Wrongdoing line (01527 544777).</i></p> <p><i>Guidance to staff and their managers on what they must and must not do when they suspect fraud is included in Appendix C.</i></p> <p><i>Staff must report any conflicts of interest, including any offer of gifts or hospitality (whether accepted or not) to the Governor or Head of Group. A local register at Directorate, Group and Establishment level must be maintained to record all potential conflicts of interest, including offers of gifts and hospitality in the format shown at Appendix C.</i></p> <p><i>The fraud response plan sets out how suspicions must be reported and how investigations must be conducted and concluded.</i></p> <p><i>If an employee suspects fraudulent activity, extreme care must be taken not to alert the potential perpetrators of the fraud. The employee must make sure that s/he reports it immediately in line with instructions. On no account should they take any action to challenge the staff that may be involved.</i></p> <p><i>Managers must report all cases of suspected fraud to the Head of Audit & Corporate Assurance (020 7217 8766; e-mail: joyce.drummond-hill@hmps.gsi.gov.uk) and copied to the Director of Finance (020 7217 2681; e-mail: ann.beasley@hmps.gsi.gov.uk) immediately they become aware of them.</i></p>

Investigations into fraud and theft must be considered under the categories defined by HM Treasury (Appendix F refers).

Where investigations are conducted into suspected fraud and theft the commissioning officer must ensure that a copy of the final investigation report, along with the outcome of any disciplinary action taken and any financial loss identified or recovered is advised to the Head of Audit & Corporate Assurance.

Where assets have been stolen, the Prison Service must make every effort to recover them.

All losses, even if recovery has been made, must be advised to Losses Section in FC&A.

Press Office (and Ministers) must be briefed where it is likely that a criminal case will be brought against an individual.

All investigations must consider what action needs to be taken to prevent a recurrence. This must be included on the Fraud/Theft Investigation report submitted to FC&A Losses Section (Finance Manual Chapter 5).

The effectiveness of action taken to implement agreed recommendations is reported to the Audit Committee.

RESOURCE IMPLICATIONS

There are no additional resource implications.

IMPLEMENTATION DATE:

17 March 2008

(signed)

**Ann Beasley
Director of Finance**

Area/Operational Manager

Further advice or information on this PSO or the systems contained within it can be sought from:

Head of Audit & Corporate Assurance – 020 7217 8766

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PRISON SERVICE ANTI FRAUD STRATEGY

SECTION 1 – INTRODUCTION

- 1.1 The majority of our staff are scrupulously honest. They are tireless in their efforts to ensure that we run the Prison Service in accordance with our values and the highest standards of public service. But in an organisation of this size there will always be, from time to time, a few people who betray those values and, for whatever reason, abuse their position. Internal fraud can take a number of forms, from theft to misuse of confidential information.
- 1.2 That is why we need robust systems and detection mechanisms if we are to maintain a secure, honest and open working environment. It is also why the Board agreed some time ago that we should thoroughly investigate all suspected frauds. Wherever we find fraud proved and a member of staff is involved – whether the fraud is internal or external – we will take disciplinary action against the person or people involved. Penalties can include dismissal; people involved in serious fraud can also expect to face prosecution.
- 1.3 The Anti-Fraud Strategy that aims to counter internal fraud against the Prison Service has been reviewed as one of the key elements in the wider Governance and Risk Management Framework within the Prison Service.

SECTION 2 – POLICY

- 2.1 The Prison Service expects its staff to work with absolute honesty and integrity. It details its requirements in Prison Service Orders and Instructions, the Staff Handbook and the Code of Conduct and Discipline. The Prison Service will discipline, and consider dismissing any employee who fails to carry out their work in accordance with the expected standards of behaviour and the professional standards and codes of ethics of Professional Bodies to which many specialist staff are affiliated. These standards will equally apply to independent Consultants and other temporary or Agency staff employed by the Prison Service.
- 2.2 The Prison Service has a statutory duty to protect public funds. In doing so, it encourages a culture of openness and transparency. *All allegations of fraud must be investigated. Where appropriate the Police must be informed. Action must be taken where fraud is proved.*

SECTION 3 – DEFINITIONS

- 3.1 Fraud is described in the dictionary as:

‘The use of false representation to gain an unjust advantage; a dishonest trick; a person not fulfilling what is claimed or expected of them’
- 3.2 Fraud includes, but is not limited to, Theft, Corruption, Extortion, Deception, Concealment of Facts, Misappropriation, Forgery, Embezzlement, Conspiracy, Bribery or Collusion. The legislation covering fraudulent action or intent is contained in the Fraud Act 2006; other aspects of fraudulent activity and theft are detailed in the Theft Acts 1968 to 1996.
- 3.3 Examples of how these might manifest themselves in the Prison Service are shown in [Appendix A](#).

SECTION 4 – MANAGING THE RISK OF FRAUD

- 4.1 Prison Service Management Board, (PSMB) has assigned responsibility for Fraud Risk Management in the Prison Service to the Director of Finance.
- 4.2 However, the effective eradication of fraud starts with all managers and they should try to create the conditions in which staff have neither the motivation nor the opportunity to commit fraud. It is the responsibility of all managers – at every level – in the Prison Service to ensure that they manage the risk of fraud within their respective work areas. *The risk of fraud must be regularly reviewed as part of managers' overall assessment of business risk. Steps that managers must take are described at [Appendix B](#).*
- 4.3 For advice on managing risk, evaluating possible conflicts of interest, or the development or evaluation of controls, contact Audit & Corporate Assurance on 020 7217 8766.

SECTION 5 – THE ROLE OF THE AUDIT & CORPORATE ASSURANCE FRAUD INVESTIGATION TEAM

- 5.1 As part of PSMB's commitment to fighting fraud, a dedicated Fraud Investigation Team has been established under the direction of the Head of Audit & Corporate Assurance. This Team is responsible for:
- carrying out investigations into allegations of fraud;
 - providing advice and guidance to line management on how to deal with suspected fraud;
 - unannounced visits to check on areas where there is a high risk of fraud;
 - raising fraud awareness by making presentations at Area Conferences and other meetings; and
 - using investigation and analysis tools to interrogate corporate data to identify indicators of possible fraud.

SECTION 6 – REPORTING FRAUD

- 6.1 *All staff who suspect fraud or theft must report it either to their line manager or to the Fraud hotline (0207 217 8804) or, alternatively, to Professional Standards Unit - Wrongdoing line (01527 544777). Professional Standards Unit refer all cases of suspected fraud reported via the Wrongdoing line to the Fraud Investigation Team for investigation.*
- 6.2 *Guidance to staff and their managers on what they must and must not do when they suspect fraud is included in [Appendix C](#).*
- 6.3 The Head of Audit & Corporate Assurance discusses cases of suspected fraud with the Director of Finance each month to agree actions as appropriate. The Head of Audit & Corporate Assurance reports quarterly to the Director General, through the Audit Committee, on the incidence of reported fraud across the Service and on the results of investigations conducted by the Fraud Investigation Team. She also has direct access to the Director General in order that she can raise concerns directly with him outside the normal reporting cycle.

SECTION 7 – DECLARATION OF CONFLICTS OF INTEREST

- 7.1 It is an offence for a civil servant to corruptly accept any money, gift or consideration as an inducement or reward for:
- doing (or not doing) anything in their official capacity or;
 - showing favour (or disfavour) to anyone in their official capacity.

- 7.2 *Staff must report any conflicts of interest, including any offer of gifts or hospitality (whether accepted or not) to the Governor or Head of Group. A local register at Directorate, Group and Establishment level must be maintained to record all potential conflicts of interest, including offers of gifts and hospitality in the format shown at [Appendix D](#).*
- 7.3 Appendix C lists some simple rules about gifts and hospitality and when to declare conflicts of interest.

SECTION 8 – FRAUD RESPONSE PLAN

- 8.1 *The Prison Service has a Fraud Response Plan that sets out how suspicions must be reported and how investigations must be conducted and concluded. This plan forms part of the Anti-Fraud Strategy and is included at [Appendix E](#).*
- 8.2 *Investigations into allegations of fraud and theft must be considered under the categories defined by HM Treasury ([Appendix F](#)) and the financial loss to the Prison Service must be established. Where disciplinary action is undertaken the level of penalty awarded must be notified to the Conduct and Performance Team.*

Examples of Instances of Fraud - *dictionary definition of each term is in italics***Theft** – *an act/instance of stealing*

A global term for stealing, for example a colleague's personal belongings or cash being sent to a jail for a prisoner.

Corruption – *abuse of official position for personal advantage or gain*

Eg staff who can self certify authorising false expenses claims.

Extortion – *to obtain money or favours by intimidation, violence or misuse of authority*

Using authority or information against a colleague to gain an advantage, eg a manager instructing a junior officer to place an order for goods/services with a specific supplier with whom the manager has a relationship.

Deception – *the act of deceiving someone*

Providing information that is untrue to gain benefit, eg giving false information about domestic circumstances in order to gain additional expense payments (for example, under public interest transfer conditions).

Concealment of Facts – *to cover and hide, to keep secret*

Eg not informing pay section when a retired officer receiving a pension dies, with the result that payment is still made or not informing pay section when an overpayment has been made.

Misappropriation – *to take and use money dishonestly*

Stealing money for personal benefit and then replacing the original amount, eg borrowing from the cash box and replacing funds on pay day.

Forgery – *illegal copying, crime of making fraudulent imitation*

Falsifying authorising officers' signatures on documents for gain or to conceal other misdemeanours, eg authorising signature on invoices.

Embezzlement – *to steal (money) that belongs to the organisation one works for*

Stealing specifically from the organisation, eg computer equipment or petty cash.

Conspiracy– *a secret plan to carry out an illegal or harmful act*

Eg several people all travelling on official business in one car but each making a T & S claim for travelling separately.

Bribery – *to give something, often illegally, to a person to receive services or gain influence*

Taking money for not pursuing a debt or for showing favouritism, eg writing off a balance due on an account in return for gifts or money, or taking money or gifts in exchange for using a specific supplier.

Collusion - *secret/illegal agreement or co-operation*

Agreement between a member of staff and a supplier to the financial benefit of both.

THE RISK MANAGEMENT PROCESS

1. Identify the risk areas.

Establish which parts of their work area are most vulnerable to fraud. These might include things like letting or managing contracts, handling cash, ordering equipment, paying invoices, making changes to pay details. Other risks might include considering whether staff have interests which would conflict with the interests of the Prison Service or would undermine public confidence in the Service in any way.

2. Allocate responsibility for the risk.

Identify who is responsible for managing each risk. Ensure that the member of staff has adequate training, support and expertise to manage the risk effectively.

3. Identify what is in place to deal with the risk.

Identify what controls are in place to stop the risk from materialising, establish who is responsible for the controls and ask them to report on how well the controls are operating. These might include supervision and checking output; separation of duties to ensure that key functions and controls are not performed by the same member of staff; random spot checks by managers; a complete and secure audit trail; monitoring and management information; independent reviews.

4. Identify controls that would improve the way in which the risk is being managed.

If controls are missing or are not effective, develop an action plan for introducing further controls or strengthening existing ones – and assign responsibility for each action. However, the managers responsible for implementing controls must ensure that any revised controls are cost effective in relation to the risk that they are dealing with.

5. Implement the revised controls.

Managers must ensure that written guidance is updated and, where necessary, training provided for the staff who will need to implement the revised procedure.

6. Evaluate the effectiveness of the controls.

On a regular basis managers should review with risk owners in their work area the effectiveness of the controls in place and assess how well each of the risks are being managed.

HOW TO REACT IF YOU SUSPECT A FRAUD**YOU MUST**

- *Make an immediate note of your concerns.*
- *Convey your suspicions to someone with the appropriate authority and experience.*
- *Deal with the matter promptly.*
- *Take anonymous letters seriously.*

YOU MUST NOT

- *Do nothing.*
- *Be afraid of raising your concerns.*
- *Approach or accuse any individuals directly.*
- *Try to investigate the matter yourself.*
- *Convey your suspicions to anyone other than those with the proper authority.*
- *Handle documentary evidence more than necessary.*

HOW MANAGERS MUST REACT TO SUSPECTED FRAUD:**YOU MUST**

- *Be responsive to staff concerns.*
- *Note details.*
- *Evaluate the allegation objectively.*
- *Advise the appropriate person.*
- *Deal with the matter promptly, if you feel the concerns are warranted.*

YOU MUST NOT

- *Ridicule suspicions raised by staff.*
- *Approach or accuse any individuals directly.*
- *Convey your suspicions to anyone other than those with the proper authority.*
- *Try to investigate the matter yourself.*
- *Handle documentary evidence more than necessary.*

CONFLICTS OF INTEREST**YOU MUST NOT**

- *Accept gifts, inducements or inappropriate hospitality.*
- *Abuse your past or present official position to obtain preferential rates for private deals.*
- *Show favouritism in awarding contracts.*
- *Misuse or make available confidential information.*

YOU MUST MAKE SURE THAT YOU

- *Understand and comply with the standards of behaviour expected of you, ie Staff Handbook, Code of Conduct and Discipline, Professional Standards Statement, Prison Service Orders and Instructions, Prison Service Standards, etc. Consult your manager if you are unsure.*
- *Are not in a position where your private interests and Prison Service duties conflict.*
- *Obtain line management permission before taking on outside work.*
- *Declare any relevant interests. If in doubt, ask yourself:*
 - *Am I, or might I be in a position where I (or my family/friends) could gain from the connection between my private interests and my job?*
 - *Could my outside interests be detrimental in any way to the Prison Service?*
 - *If someone else viewed my actions would it cause them to question my intentions?*
 - *Do I have any other reason to think I may be risking a conflict of interest?*

IF YOU ARE STILL UNSURE – YOU MUST DECLARE IT

REGISTER OF GIFTS AND HOSPITALITY AND OF CONFLICTS OF INTEREST

Date reported and to whom	Details of Gift/ Hospitality offered or of Conflict of Interest	Details of action taken – e.g. acceptance or rejection of gift/hospitality or action to mitigate conflict of interest

**Must be at Senior Manager Level*

PRISON SERVICE – FRAUD RESPONSE PLAN

1. Introduction

1.1 There are two key documents that include guidance on how to deal with suspected wrongdoing and how to conduct investigations:

- PSO 8460 Conduct & Discipline Website
- PSO 1215 Professional Standards: Preventing and Handling Staff Wrongdoing

1.2 Both provide advice on how to deal with allegations of, and investigations into, fraud. This document, which is part of the Prison Service's Counter Fraud Strategy, is aimed at helping you to find the information you will need on discovering a fraud.

2. What to do on discovering a suspected fraud

2.1 *If an employee suspects fraudulent activity, extreme care must be taken not to alert the potential perpetrators of the fraud. The employee must make sure that s/he reports it immediately in line with instructions. On no account should they take any action to challenge the staff that may be involved.*

3. How to report concerns

3.1 PSO 1215 Chapter 3 – Reporting Wrongdoing explains what course of action is open to staff. The Whistleblowing Policy outlines the various routes through which a suspected fraud may be reported. Staff can also contact the Fraud Investigation Team's hotline (020 7217 8804) for advice if they are unsure how to proceed.

3.2 *Managers must report all cases of suspected fraud to the Head of Audit & Corporate Assurance (020 7217 8766; e-mail: joyce.drummond-hill@hmpr.gsi.gov.uk) and copied to the Director of Finance (020 7217 2681; e-mail: ann.beasley@hmpr.gsi.gov.uk) immediately they become aware of them.*

4. Investigations

4.1 A framework for investigations is set out in the Conduct & Discipline Website.

4.2 In cases of suspected fraud, managers have access to a dedicated team of fraud investigators in the Fraud Investigation Team. They may be commissioned to carry out investigations into suspected fraud or can provide advice and guidance to investigators commissioned locally.

4.3 *Investigations into fraud and theft must be considered under the categories defined by HM Treasury (Appendix F refers).*

4.4 *Where investigations are conducted into suspected fraud and theft the commissioning officer must ensure that a copy of the final investigation report, along with the outcome of any disciplinary action taken and any financial loss identified or recovered is advised to the Head of Audit & Corporate Assurance.*

5. Securing evidence

5.1 The Conduct & Discipline Website makes reference to the Investigation Support Section (ISS) for advice on investigation procedures. Their advice should be sought on how to

record and protect evidence gathered during an investigation. These procedures must be followed – particularly if the case is likely to become a criminal matter.

6. Dealing with employees under suspicion

6.1 Guidance is included in the Conduct & Discipline Website under 'Alternative or Detached Duty and Suspension' setting out advice on Detached Duty or Suspension from Duty.

7. Interviewing

7.1 The Conduct & Discipline Website under 'Disciplinary Investigation – Interviewing Staff' gives guidance on how to conduct interviews.

8. When and how to involve the Police

8.1 Guidance is included in the Conduct & Discipline Website under 'Police Investigations'.

9. Recovery of assets/money

9.1 *Where assets have been stolen, the Prison Service must make every effort to recover them.* The Conduct & Discipline Website 'Action Post Investigation – Financial Restitution' refers to a financial penalty of restitution up to the sum of £600 for damages to property or loss to public funds caused deliberately or through negligence. However, there are other avenues that may be pursued. Where a criminal conviction is obtained, the Prison Service should apply for a confiscation order. Where the case does not involve the police or where the criteria do not meet those set out in Conduct & Discipline Website, recovery action for the value of the asset (up to £5,000) should be pursued through the small claims court if necessary.

9.2 *All losses, even if recovery has been made, must be advised to Losses Section in FC&A so that amount must can be recorded and written off where appropriate.*

10. When and how to brief the Press Office

10.1 The Conduct & Discipline Website deals with disclosure but does not make direct reference to the media. *Press Office (and Ministers) must be briefed where it is likely that a criminal case will be brought against an individual.*

11. Reducing the risk of fraud in the future

11.1 PSO 1215 Chapter 2 makes reference to the need to complete an annual fraud risk assessment (Finance Manual). *All investigations must consider what action needs to be taken to prevent a recurrence. This must be included on the Fraud/Theft Investigation report submitted to FC&A Losses Section (Finance Manual Chapter 5).*

11.2 Where the Fraud Investigation Team has conducted the investigation, the report will include a section making recommendations for improved controls. *The effectiveness of action taken to implement agreed recommendations is reported to the Audit Committee.*

12. Dissemination of lessons learned

12.1 The Fraud Monitoring Bulletin which is published on the Intranet advises staff of areas where the Prison Service may be exposed to the risk of fraud. It also includes guidance on how to reduce the risk of fraud in those areas. The bulletin is produced by the Fraud Monitoring Group which is chaired by the Head of Audit & Corporate Assurance and comprises of representatives from FC&A, the Fraud Investigation Team, the Professional Standards Unit and HR Directorate, Conduct and Performance Team.

13. Sources of expert help and advice

13.1 The following experts can be contacted for advice in their area of specialism.

- Conduct & Performance Team – disciplinary matters
- Fraud Investigation Team – fraud investigations and advice
- Police Advisers – advice on criminal proceedings
- Professional Standards Unit – reporting wrongdoing
- Investigation Support Section – conduct of investigations
- National Audit Office – financial propriety
- Legal Advisers – current legislation
- FC&A – reporting frauds and losses

APPENDIX F

In accordance with Government Accounting Regulations the Prison Service has to report all cases of actual or attempted fraud or theft. HM Treasury defines fraud and theft under various categories and, where internal investigations are conducted into allegations of fraud or theft then the following categories should be considered and used for the purpose of performing the investigation and reporting on the outcome and any disciplinary action and penalty awarded following a disciplinary hearing.

CATEGORY	EXAMPLES
<p>Travelling, Subsistence and Personal Allowances Frauds involving travel and subsistence claims and personal allowances that require the completion of a claim for payment.</p>	<ul style="list-style-type: none"> ● Claims for journeys that were not made; ● Claims for overnight subsistence but staying with relatives rent free; ● Overstated claims; ● Forged signatures on claim forms; ● Claims for allowances for which there was no entitlement; ● Claims relating to circumstances no longer applying such as excess fares, lodging allowances; ● Forged receipts (eg fuel bills, hotel bills, taxi receipts).
<p>Pay or Allowances Paid via the Payroll Fraud involving payment via the payroll process.</p>	<ul style="list-style-type: none"> ● The creation of “ghosts”, “echoes” and other fictitious employees on the payroll; ● False claims such as overtime and other taxable allowances; ● Altered performance markings or false documentation leading to bonus payments; ● Unauthorised changes to payroll data; ● Deliberate failure to repay advances of salary; ● The retention of credits, supplements or allowances beyond the period of entitlement; ● Misuse of pay advances or loans (eg season ticket advance used for purposes other than the purchase of a season ticket to the value of the advance).
<p>Theft of Physical Assets or Cash Thefts of cash or physical assets.</p>	<ul style="list-style-type: none"> ● Theft of cash (eg Cashier, Reception petty cash floats); ● Theft of physical assets (eg items recorded on the local asset register or the fixed asset register).

<p>Exploitation of Assets and Information This type of fraud involves using assets of the organisation for other than official purposes and/or supplying information to outside organisations for personal gain.</p> <p><u>NB:</u> cases of unauthorised access to information without a fraudulent intent should be excluded.</p>	<ul style="list-style-type: none"> ● Using official vehicles for personal gain; ● Running own business using the organisations assets (eg IT system); ● Selling information to mail shot companies; ● Downloading pornography for sale.
<p>Procurement Fraud Procurement is the whole process of acquisition from third parties and covers goods, services and construction projects.</p>	<ul style="list-style-type: none"> ● Manipulating tenders/collusive tendering (including rings and cartels); ● Rigging specifications in favour of one supplier; ● Product substitution or sub-standard work or service not meeting contract specifications; ● Theft of new assets before delivery to end user and before being recorded in the asset register; ● Fraudulent (false or duplicate) invoicing for goods or services not supplied or for interim payments in advance of entitlement; ● Improper or unauthorised use of Government furnished equipment or information; ● False accounting and cost misallocation or cost migration between contracts; ● Goods ordered for personal use; ● Provision of fraudulent test or quality assurance certificates; ● Corruption or attempted corruption of Crown Servants.
<p>GPC/Credit Card Fraud All cases involving the improper use of GPC or credit cards.</p>	<ul style="list-style-type: none"> ● Covers the use of Barclaycard VISA.
<p>Personnel Management Related Fraud Cases reported under this category should only include those where the action taken against the perpetrator involves some personal disadvantage or deprivation. Where oral or written warnings have only been issued cases should not be reported.</p>	<ul style="list-style-type: none"> ● Staff on sick leave but working elsewhere; ● Serious abuses of flexible working time system; ● Annual leave abuses; ● Misuse of official time (eg Internet abuse, playing electronic games, abusing the department's computer misuse policy, sleeping whilst on duty); ● Deceit and misrepresentation for advantage (eg false references or false qualifications used to secure employment).
<p>Payment Fraud Theses are frauds which involve expenditure systems relating to payments for resources acquired for official use and consumption. Payments involving claims by an employee will normally be covered under "travel, subsistence and allowances" or "pay related frauds".</p>	<ul style="list-style-type: none"> ● Creating false payments; ● Theft of completed payable orders; ● Theft of letters containing payable orders prior to posting; ● Providing confidential information to outsiders allowing them to make fraudulent claims; ● False accounting; ● Theft of cash (ie petty cash floats used for making small payments);

	<ul style="list-style-type: none"> • Creating false BACS payments (eg adding records to a BACS file before it is sent to the bank).
<p>Fraud Relating to Departmental Income This type of fraud covers theft of income.</p>	<ul style="list-style-type: none"> • Theft of income (eg income received that has not yet been recorded in the accounting system such as income received by post, cash or cheques awaiting banking); • Understating or failing to record income so that “surplus” income can be stolen (ie false accounting); • Manipulation of fees/charges/sales records; • Manipulation of debtors records and write-off provisions; • Theft of income received via the post/Reception after it has been recorded in the accounting system.
<p>Other Fraud and theft not falling into the above categories.</p>	<ul style="list-style-type: none"> • Counterfeit/forged bank notes.