

# Counter fraud and corruption policy.

## INTRODUCTION

- 1.1 In administering its responsibilities; Cheltenham Borough Council has a duty to prevent fraud and corruption, whether it is attempted by someone outside or within the Council such as another organisation, a resident, an employee or Councillor. The Council is committed to an effective Counter Fraud and Corruption culture, by promoting high ethical standards and encouraging the prevention and detection of fraudulent activities.
- 1.2 The Resources Director as the "Section 151 Officer" has a statutory responsibility under section 151 of the Local Government Act 1972 to ensure the proper arrangements for the Council's financial affairs and has developed financial codes of practice and accounting instructions. The Director of Resources exercises a quality control on financial administration through delegation to the Head of Finance (Go Shared Services).
- 1.3 The Monitoring Officer has a statutory responsibility to advise the Council on the legality of its decisions and to ensure that the Council's actions do not give rise to illegality or maladministration. It is therefore essential for employees to follow the Council's policies and procedures to demonstrate that the Council is acting in an open and transparent manner.
- 1.4 The Council will thoroughly investigate all suggestions of fraud, corruption or theft, both from within the Council and from external sources, which it recognises can:
  - Undermine the standards of public service that the Council is attempting to achieve.
  - Reduce the level of resources and services available for the residents of Cheltenham.
  - Result in consequences which reduce public confidence in the Council.
- 1.5 Any proven fraud will be dealt with in a consistent and proportionate manner. Appropriate sanctions and redress will be pursued against anyone perpetrating, or seeking to perpetrate fraud, corruption or theft against the Council.
- 1.6 The Council is committed to the highest possible standards of openness, probity, honesty, integrity and accountability. The Council expects all staff, Councillors and partner organisations to observe these standards which are defined within the Code of Conduct for employees and Members Code of Conduct, underpinned by its values and help achieve the Council's over-arching priority for the continued delivery of outcomes and value for money for local tax-payers.

## DEFINITIONS

- 2.1 **FRAUD:** Is defined by The Fraud Act 2006 as follows:

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A person is guilty of fraud if he is in breach of any of the following:

Fraud by false representation; that is if a person:

- (a) dishonestly makes a false representation, and
- (b) intends, by making the representation:
  - (i) to make a gain for himself or another, or
  - (ii) to cause loss to another or to expose another to a risk of loss.

Fraud by failing to disclose information; that is if a person:

- (a) dishonestly fails to disclose to another person information which he is under a legal duty to disclose, and
- (b) intends, by failing to disclose the information:
  - (i) to make a gain for himself or another, or
  - (ii) to cause loss to another or to expose another to a risk of loss.

Fraud by abuse of position; that is if a person:

- (a) occupies a position, in which he is expected to safeguard, or not to act against, the financial interests of another person,
- (b) dishonestly abuses that position, and
- (c) intends, by means of the abuse of that position:
  - (i) to make a gain for himself or another, or
  - (ii) to cause loss to another or to expose another to a risk of loss.

The Fraud Act 2006 repeals certain offences that are detailed in the Theft Acts of 1968 and 1978. The term "fraud" is usually used to describe depriving someone of something by deceit, which might either be misuse of funds or other resources, or more complicated crimes like false accounting or the supply of false information. In legal terms, all of these activities are the same crime, theft, examples of which include deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion.

- 2.2 **CORRUPTION:** Is the deliberate use of one's position for direct or indirect personal gain. "Corruption" covers the offering, giving, soliciting or acceptance of an inducement or reward, which may influence the action of any person to act inappropriately.
- 2.3 **THEFT:** Is the physical misappropriation of cash or other tangible assets. A person is guilty of "theft" if he or she dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it.
- 2.4 **MONEY LAUNDERING:** Money laundering is the process by which criminals attempt to 'recycle' the proceeds of their criminal activities in order to conceal its

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origins and ownership and which leaves them with money that cannot be traced back.

All employees are instructed be aware of the increasing possibility of receiving requests that could be used for money laundering and illicit requests for money through e-mails. Detailed guidance is set out in the Council's Proceeds of Crime / Money Laundering Policy.

- 2.5 Any Service that receives money from an external person or body is potentially vulnerable to a money laundering operation. The need for vigilance is vital and if there is any suspicion concerning the appropriateness of the transaction then advice must be sought from Internal Audit. The Council has a separate and more detailed Proceeds of Crime / Money Laundering Policy and a designated money laundering reporting officer who is the is the Section 151 Officer; Director of Resources and nominated to receive disclosures about money laundering activity
- 2.6 One Legal (the councils legal team) also have their own professional guidance in relation to money laundering which places a duty on solicitors to report any suspicions and these may override their legal professional privilege and confidentiality. All such suspicions must be reported to the Monitoring Officer and the Money Laundering Reporting Officer.
- 2.7 **BRIBERY:** The Bribery Act 2010 received Royal Assent on 8th April 2010. Previously, bribery has been viewed within the definition of corruption, as defined within the Council's Counter Fraud and Corruption Policy. The Bribery Act 2010 introduces four main offences, simplified as the following:
- Bribing another person: a person is guilty of an offence if he/she offers, promises or gives a financial or other advantage to another person.
  - Offences relating to being bribed: a person is guilty of an offence if he/she requests, agrees to receive, or accepts a financial or other advantage. It does not matter whether the recipient of the bribe receives it directly or through a third party, or whether it is for the recipient's ultimate advantage or not.
  - Bribery of a foreign public official: a person who bribes a foreign public official is guilty of an offence if the person's intention is to influence the foreign public official in their capacity, duty or role as a foreign public official.
  - Failure of commercial organisations to prevent bribery: organisations, which include the Council, must have adequate procedures in place to prevent bribery in relation to the obtaining or retaining of business.

Note: A 'financial' or 'other advantage' may include money, assets, gifts or services.

- 2.8 Prior to entering into any business arrangements, all Council officers and/or business units should ensure that they have taken all reasonable steps to identify any potential areas of risk relating to bribery or corruption.

### 3. SCOPE

- 3.1 This document applies to:

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- All employees (including casual workers and Agency Staff) and Councillors.
- Committee Members of Council funded voluntary organisations.
- Partner organisations. (where CBC have a financial or statutory responsibility)
- Council Suppliers, Contractors and Consultants.
- General Public.

## 4. AIMS AND OBJECTIVES

4.1 The aims and objectives of the Counter Fraud and Corruption Policy are to:

- Ensure that the Council is protected against fraud and loss.
- Protect the Council's valuable resources by ensuring they are not lost through fraud but are used for improved services to Cheltenham residents and visitors.
- Create a 'Counter fraud' culture which highlights the Council's zero tolerance of fraud, corruption and theft, which defines roles and responsibilities and actively engages everyone (the public, Councillors, staff, managers and policy makers).

To provide a best practice 'counter fraud' service which:

- Proactively deters, prevents and detects fraud, corruption and theft.
- Investigates suspected or detected fraud, corruption and theft.
- Enables the Council to apply appropriate sanctions and recovery of losses.
- Provides recommendations to inform policy, system and control improvements, thereby reducing the Council's exposure to fraudulent activity.

## 5. PRINCIPLES

5.1 The Council will not tolerate abuse of its services or resources and has high expectations of propriety, integrity and accountability from all parties identified within this policy. The Council will ensure that the resources dedicated to "counter-fraud" activity are sufficient and all those involved are trained to deliver a professional "counter fraud" service to the highest standards.

5.2 All fraudulent activity is unacceptable, and will result in consideration of legal action being taken against the individual(s) concerned. The Council will also pursue the repayment of any financial gain from individuals involved in malpractice and wrongdoing. The Council will ensure consistency, fairness and objectivity in all its "counter-fraud" work and that everyone is treated equally.

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- 5.3 This policy encourages those detailed in section 3.1 to report any genuine suspicions of fraudulent activity. However, malicious allegations or those motivated by personal gain will not be tolerated and, if proven, disciplinary or legal action may be taken. Sections 8.3 and 8.4 detail the reporting arrangements in relation to incidents of fraud or irregularity.
- 5.4 The Council will work with its partners (such as the Police, other Councils and other investigative bodies) to strengthen and continuously improve its arrangements to prevent fraud and corruption.

### 6. RESPONSIBILITIES

STAKEHOLDER	SPECIFIC RESPONSIBILITIES
<b>Chief Executive</b>	Ultimately accountable for the effectiveness of the Council's arrangements for countering fraud and corruption.
<b>Resources Director (Section 151 Officer)</b>	To ensure the Council has adopted an appropriate Counter fraud policy, there is an effective internal control environment in place and there is an adequately resourced and effective Internal Audit service to assist with 'counter fraud' work.
<b>Borough Solicitor and Monitoring Officer</b>	To advise Councillors and Officers on ethical issues, conduct and powers to ensure that the Council operates within the law and statutory Codes of Practice.
<b>Audit Committee</b>	<p>To receive formal assurance from Internal Audit at each meeting and an annual opinion report in June.</p> <p>A formal counter fraud report will be issued to the Audit Committee in June</p> <p>The Audit Committee also receive assurance:</p> <ul style="list-style-type: none"> <li>- from external audit on the Council's Annual Accounts and Annual Governance Statement</li> <li>- on the effectiveness of the corporate governance framework</li> <li>- on the effectiveness of the corporate risk management processes</li> </ul>

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<p><b>Councillors</b></p>	<p>To comply with the Members Code of Conduct and related Council policies and procedures and to be aware of the possibility of fraud, corruption and theft, and to report any genuine concerns accordingly.</p>
<p><b>External Audit</b></p>	<p>Statutory duty to ensure that the Council has adequate arrangements in place for the prevention and detection of fraud, corruption and theft.</p>
<p><b>Internal Audit</b></p>	<p>Responsible for assisting the development and implementation the Counter Fraud and Corruption Policy and monitoring the investigation of any reported issues. To ensure that all suspected or reported irregularities are dealt with promptly and in accordance with this policy and that action is identified to improve controls and reduce the risk of recurrence.</p> <p>Reporting to the chief executive and the Resources Director on the progress and results of investigations</p> <p>Reporting annually to Audit Committee on proven frauds</p>
<p><b>Executive Directors, Directors, and Service Managers</b></p>	<p>To promote staff awareness and ensure that all suspected or reported irregularities are immediately referred to Internal Audit. To ensure that there are mechanisms in place within their service areas to assess the risk of fraud, corruption and theft and to reduce these risks by implementing internal controls.</p>
<p><b>Staff</b></p>	<p>To comply with Council policies and procedures, to be aware of the possibility of fraud, corruption and theft, and to report any genuine concerns to management, or through the <a href="#">Whistleblowing Policy Procedures</a>.</p>

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**Public, Partners, Suppliers, Contractors and Consultants**

To be aware of the possibility of fraud and corruption against the Council and report any genuine concerns / suspicions.

### 7. APPROACH TO COUNTERING FRAUD

- 7.1 Cheltenham Borough Council has a responsibility to reduce fraud and protect its resources by completing work in each of the following key areas:
- 7.2 **DETERRENCE:** The Council will promote and develop a strong “counter-fraud” culture, raise awareness and provide information on all aspects of its “counter-fraud” work. This includes advice on the intranet, a fraud e-learning tool, publicising the results of proactive work, investigating fraud referrals and seeking the recovery of any losses due to fraud.
- 7.3 **PREVENTION:** The Council will strengthen measures to prevent fraud. Internal Audit will work with managers and policy makers to ensure new and existing systems, procedures and policy initiatives consider any fraud risks. Audit activity will also consider fraud risks as part of each review.
- 7.4 **DETECTION:** Internal Audit maintains a record of all fraud referrals with the exception of benefit fraud; this is held with the Benefit Fraud Team. This record helps to establish those areas within the Council most vulnerable to the risk of fraud. This also enables a Council wide fraud profile to be created which then informs any detailed work in areas throughout the Council aimed at detecting existing and new types of fraudulent activity.

Internal Audit also leads in the National Fraud Initiative (NFI) run by the Audit Commission. An officer in the internal audit team is designated as the ‘Key Contact’ for this process. Furthermore, an annual survey is submitted to the Audit Commission on behalf of the authority by Internal Audit. Areas indicated in the surveys may receive proactive investigation where appropriate.

Internal controls are established for financial and other systems within the Council. They are designed to discourage fraud and provide indicators of any fraudulent activity. The Council also relies on employees, Councillors and the public to be alert and to report suspicion of fraud and corruption.

Managers should pay particular attention to circumstances which may require additional and sensitive monitoring or supervision. Examples of Fraud Indicators are detailed in Appendix C.

- 7.5 **INVESTIGATION:** The Council will investigate all reported incidents of fraud or irregularity. Please see Appendix A for the Protocol for Investigating Irregularities.

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- 7.6 **SANCTIONS:** The Council will apply realistic and effective sanctions for individuals or organisations where an investigation reveals fraudulent activity. This will include legal action in addition to criminal and disciplinary action, where appropriate.
- 7.7 **REDRESS:** A crucial element of the Council's response to tackling fraud is seeking financial redress. The recovery of defrauded monies is an important part of the Council's strategy and will be pursued, where appropriate.
- 7.8 In addition to the above, Internal Audit also prepares a risk based annual Audit Plan that details the key objectives and areas of work for the year. Within these work areas indicators for fraud are considered. Internal Audit will also respond to requests from management where there may be concerns over the effectiveness of internal controls. The work plan is agreed and monitored by the Audit Committee and Section 151 Officer.

### 8. REPORTING, ADVICE AND SUPPORT

- 8.1 The Council's expectation is that Councillors and managers will lead by example and that employees at all levels will comply with the Constitution, Council Policies, Financial Regulations, Financial and Contract Procedure Rules and directorate procedures.
- 8.2 The Council recognises that the primary responsibility for the prevention and detection of fraud rests with management. It is essential that employees of the Council report any irregularities, or suspected irregularities to their line manager and if this is not appropriate then to the Service Manager or Director. The Council will provide all reasonable protection for those who raise genuine concerns in good faith.
- 8.3 The line manager, Service Manager or Director who receives the allegation (whether from a Councillor or a Council employee) must refer the matter to the Resources Director (Section 151 Officer) or one of the following people depending on the circumstances, to determine how the potential irregularity will be investigated:
- Borough Solicitor and Monitoring Officer
  - Relevant Director.
  - Internal Audit.
  - Head of HR GoSS /HR Operations Manager GoSS
- 8.4 Where appropriate, the Resources Director should inform the Chief Executive and Monitoring Officer where the irregularity is material and/or could affect the reputation of the Council. The Section 151 Officer will liaise with the Cabinet Member for Corporate Services, as appropriate. The Communications Team should also be informed if the matter is likely to be communicated externally.
- 8.5 The investigating officer will follow the Guidelines for Managers on Investigating Allegations as well as the Protocol for Investigating Irregularities Appendix A), which includes the need to:



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- Deal promptly with the matter.
- Record all evidence received.
- Ensure that evidence is sound and adequately supported.
- Ensure security of all evidence collected.
- Contact other agencies if necessary e.g. Police.
- Notify the Council's insurers.
- Implement Council disciplinary procedures where appropriate.

8.6 The Council will also work in co-operation with the following bodies that will assist in scrutinising our systems and defences against fraud and corruption:

- Local Government Ombudsman
- External Audit
- the National Fraud Initiative and related Audit Networks
- Central Government Departments
- HM Revenue and Customs
- UK Border Agency
- Department for Work and Pensions
- Police.

8.7 Any concerns or suspicions reported will be treated with discretion and in confidence. Key contacts include:

Resources Director (Section 151 Officer)	Write to: Cheltenham Borough Council Municipal offices Promenade Cheltenham Glos. GL50 9SA.
Borough Solicitor and Monitoring Officer	
Relevant Director	
Internal Audit	
Audit Committee Chairman	
Standards Committee Chairman	

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8.8 Attached are the following Appendices:

Appendix A: The Protocol for Investigating Irregularities.

Appendix B: The Council's Fraud Response Plan.

Appendix C: Examples of Fraud Indicators.

### 9. FURTHER INFORMATION

9.1 Further information on Council policy can be found in the following documents:

The Constitution.

- Code of Conduct for Employees and the Members Code of Conduct. Which include detailed policy advice on;
  - Gifts, Hospitality and sponsorship.
  - Declaring and Registering Interests
- Whistle-blowing policy.
- Financial Regulations.
- Contract Procedure Rules
- Money Laundering Policy.
- Regulation of Investigatory Powers Act (RIPA).

### 10. POLICY REVIEW

10.1 The Audit Committee will continue to review and amend this strategy as necessary to ensure that it continues to remain compliant and meets the requirements of the Council.

Responsible Officer: Director Resources

Date: January 2013

Review frequency every three years

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### **APPENDIX A PROTOCOL FOR INVESTIGATING IRREGULARITIES**

#### **a) Fraud Referral / Allegation**

The primary responsibility for the prevention and detection of fraud, corruption and theft rests with Directors and Service Managers. Internal controls have been established for financial and other systems within the Council. They are designed to discourage fraud and provide indicators of any fraudulent activity. Employees, Councillors and other groups are encouraged to report suspected irregularities in accordance with section 5.3 of this policy and the Council's [Whistle-blowing policy](#).

When a referral or allegation is received it must be reported to the key contacts and officers detailed in section 8.3 above, as well as any other relevant contacts, to determine the course of action.

In some cases, an allegation may be of a routine or minor nature that can be dealt with by service management without the need for a formal investigation. If this is the outcome, a record of the decision and who made it must be kept to enable the course of action to be justified. Alternatively, if the matter is of a nature that requires immediate Police involvement, please refer to section f) below on reporting issues to the Police.

If it is agreed that an internal investigation is required, this protocol details the stages that should be followed. It is the Director and Service Managers' responsibility to initiate and manage the investigation in potential cases of fraud, corruption or theft following consultation with Internal Audit and HR.

All investigations should be reported to Internal Audit, who will monitor the investigation, ensuring action is initiated, effectively managed and it is brought to a proper conclusion.

#### **b) The Investigation**

The Director or Service Manager should appoint a senior manager, independent of the activity, to head the investigation. The investigation officer/team will have access to specialist professional advice and investigation skills from Internal Audit, the HR Business Partner and One Legal as required. The Investigating officer/team will also have open access to service management to ensure all appropriate enquiries can be undertaken. The Director should arrange for regular briefing meetings from the investigation officer/team.

The investigation officer/team will agree a plan for the investigation having regard to the initial evidence and/or allegation. The investigation plan should be kept under regular review. Investigation progress will be reported to the Director or Service Manager and other relevant officers on a regular basis, especially when any key decisions need to be taken.

#### **c) Evidence**

All evidence gathered will be regarded as strictly confidential and will be the property of the investigation officer/team. It will only be made more widely available on agreement with the necessary officers. The team will be responsible for gathering all evidence, whether it is verbal, written or electronic, which may include the need to interview employees.

If it is necessary to interview employees, the Director or Service Manager should be informed. HR should also be contacted to ensure the interview is arranged, conducted and

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managed correctly to ensure the employee is supported and the investigation is not compromised. Interviews with employees must be conducted in accordance with the relevant Council standards and procedures, with allowances for proper representation.

When obtaining written evidence, the source copy of any documentation should be obtained. Electronic evidence will be stored on a PC, laptop, blackberry, mobile phone, etc. When obtaining electronic evidence, the main issue is how to capture the evidence before it is changed. To do this, the equipment should be secured at the earliest opportunity to ensure evidence is not altered. This is a specialist activity and should be undertaken under the supervision of an IT specialist on which ICT Infrastructure Manager can advise.

Some investigations may require either covert surveillance or a covert operation to obtain information. If covert surveillance is considered necessary consideration must be given at the outset as to whether it falls under the Regulation of Investigatory Powers Act 2000 (RIPA)

If it is decided that the proposed action is outside of RIPA a record of how that decision was arrived at must be made and the action duly authorised under the Council's Non RIPA surveillance application form and procedure.

If it is decided that the proposed action is covered by RIPA, formal authorisation will need to be obtained under the RIPA. Authorising any action under RIPA regulation needs to be obtained from the RIPA trained and designated Authorising Officer and Authorised by a Magistrate.

The conduct of interviews and gathering of evidence which may subsequently be used as criminal evidence is governed by specific rules and acts. In this respect, the following statutes are relevant:

- Police and Criminal Evidence Act 1984 (PACE).
- Regulation of Investigatory Powers Act 2000 (RIPA).
- Human Rights Act 1998.
- Data Protection Act 1998.

Specialists trained in investigation and interviewing could be made available to the investigation team if this is required. The need for specialist advice would be a part of the discussion when an investigation is initiated.

The investigation officer/team should ensure that a fully referenced investigation file is maintained, which includes all documentation, records and notes collated during the investigation.

### **d) Reporting**

Once the investigation work has been concluded, the investigating officer/team will need to prepare a written report detailing the initial referral or allegation, the work completed (including documents obtained and interviews conducted) and an opinion or conclusion on the outcome of the investigation. Depending on the severity of the investigation outcome, the report may lead to a disciplinary hearing or Police referral.

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The report should also detail any breakdown in management, operational or financial controls to the Director or Service Manager, who will have to agree the necessary actions to address the issues.

The investigation officer/team, in consultation with the Director or Service Manager, should make arrangements for the Director of Resources, Service Director, Head of Audit and Head of Human Resources to be informed of the investigation outcome. Other officers should be notified on a strictly confidential, need to know basis.

### **e) Disciplinary and Criminal Proceedings**

Directors and Service Managers will be expected to take action in accordance with the Council's [Disciplinary Policy and Procedure](#).

### **f) Police Involvement**

Reporting incidents to the Police must be considered on an individual basis. If criminal activity is suspected, the matter should be promptly reported to the Police by the Director or Service Manager. Approval to report the matter to the Police must be obtained from either the Resources Director, the business units Director, or Monitoring Officer.

Advice should be sought from Internal Audit on how the matter should be reported and who would be best placed to meet with the Police and discuss the details of the investigation. In the unlikely event that none of the above officers are immediately available, the Director must judge how quickly the matter should be reported to ensure any Police investigation is not affected.

Continuous liaison with the Police is vital as there may be parallel enquiries undertaken by the Police in addition to those in-house. Also, the Police have specialist skills to interview under caution that will be needed if evidence is to be used in court. Normally, any internal disciplinary process can take place at the same time as the Police investigation. However, this should be agreed in advance by both the Police and the Council to ensure both investigations are not compromised.

### **g) Investigation Costs**

The Internal Audit plan contains a small contingency of time for Counter fraud work. The Head of Audit, in conjunction with the Resources Director will determine whether the contingency should be used for undertaking work on a specific investigation. Where resources are not directly available through Internal Audit, any contribution may disrupt planned work so there may be an additional direct charge to the service concerned. If external specialist advice is required, this will only be after agreement both in terms of scope and cost, with the Director or Service Manager. Charges for Legal Services advice will be in accordance with the normal service agreements.

### **h) Post Investigation**

The Council wishes to see that following an investigation, action is taken to minimise future occurrence. This may involve improvements in control, changes to systems and procedures or employee training.

Any publicity arising from an investigation will be co-ordinated by the Council's Communication Team. It is the responsibility of the Director or Service Manager to ensure that the Communications Team is informed of developments following completion of an investigation.

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### **I) Training**

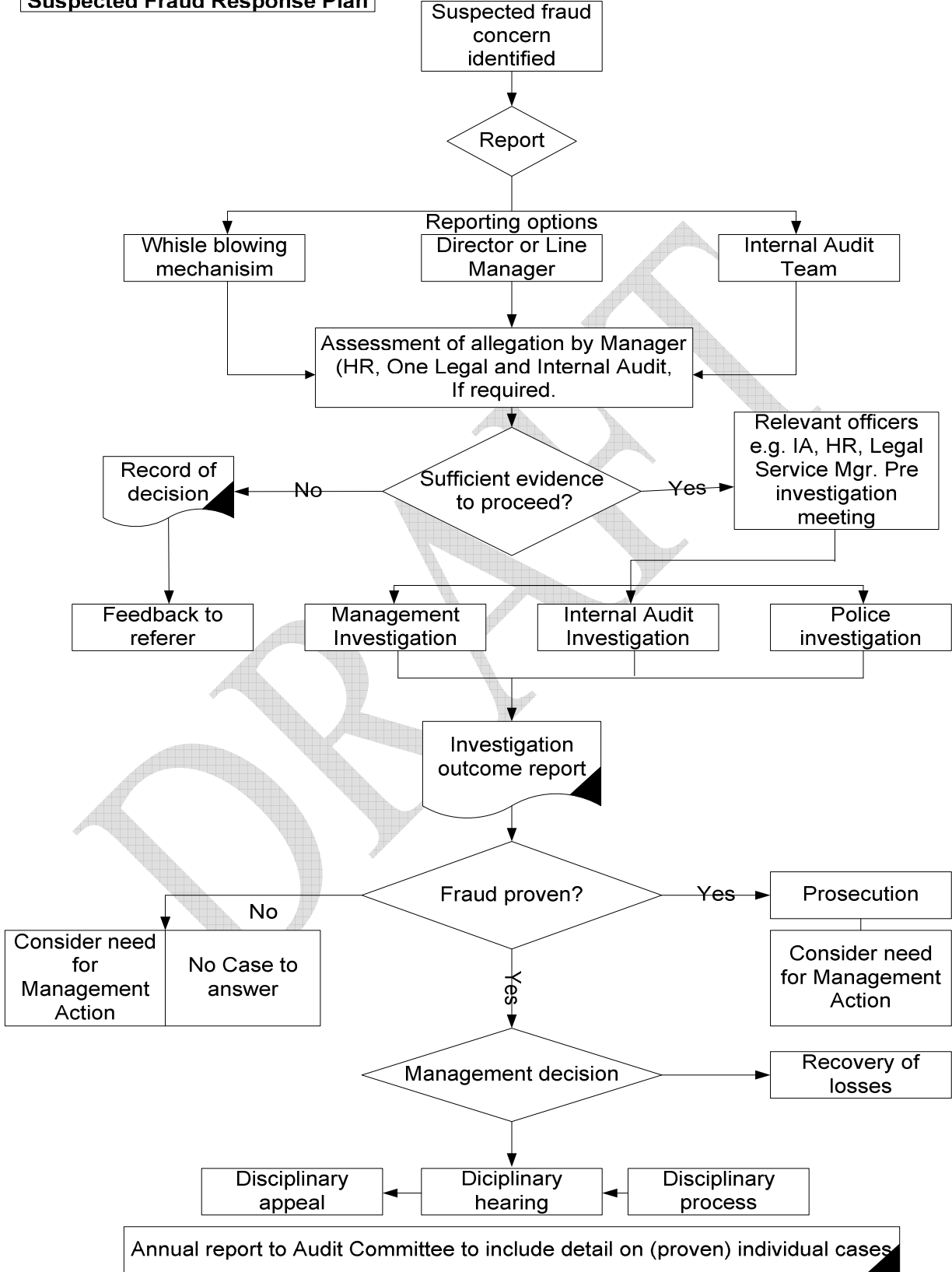
The Council acknowledges that the continuing success of its Counter Fraud and Corruption Policy and its general credibility will depend largely on the effectiveness of training and responsiveness of employees and Councillors throughout the organisation. To facilitate this, the Council has introduced a Fraud Awareness e-learning package that has been rolled out across the organisation and is included as part of officer induction arrangements. The subject is also included as part of Councillor training.

Investigation of fraud and corruption may require specialist training, not only for the Council's Internal Audit Service, but also employees within other Directorates.

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**Appendix B**  
**Suspected Fraud Response Plan**



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### APPENDIX C

A number of frauds can come to light because of suspicions aroused by, for instance, the behaviour of certain individuals. It is impossible to give a definitive list of fraud indicators or warning signs. The following are types of risk factors that may, either alone or cumulatively with other factors, suggest the possibility of fraud and may therefore warrant further investigation or enquiry.

**Unusual employee behaviour:** Refusal to comply with normal rules and practices, fails to take leave, refusing promotion, managers by-passing subordinates, subordinates by-passing managers, living beyond means, regularly working long-hours, job dissatisfaction/unhappy employee, secretiveness or undue defensiveness.

**Financial irregularities:** Key documents missing (e.g. invoices, contracts); absence of controls and audit trails; missing expenditure vouchers and official records; general ledger out of balance; bank and ledger reconciliations are not maintained or cannot be balanced; excessive movements of cash or transactions between accounts; numerous adjustments or exceptions; constant overdue pay or expense advances; duplicate payments; ghost employees on the payroll; large payments to individuals; excessive variations to budgets or contracts.

**Bad procurement practice:** Too close a relationship with suppliers/contractors; suppliers/contractors who insist on dealing with only one particular member of staff; unjustified disqualification of any bidder; lowest tenders or quotes passed over with minimal explanation recorded; defining needs in ways that can be met only by specific contractors; single vendors; vague specifications; splitting up requirements to get under small purchase requirements or to avoid prescribed levels of review or approval.

**Disorganisation:** Understaffing in key control areas; consistent failures to correct major weaknesses in internal control; inadequate or no segregation of duties.

**Inadequate supervision:** Policies not being followed; lack of senior management oversight; inadequate monitoring to ensure that controls work as intended (periodic testing and evaluation); low staff morale, weak or inconsistent management.

**Lax corporate culture:** Management frequently override internal control; climate of fear or a corporate culture; employees under stress without excessive workloads; new employees resigning quickly; crisis management coupled with a pressured business environment; high employee turnover rates in key controlling functions.

**Poor work practices:** Lack of common sense controls; work is left until the employee returns from leave; post office boxes as shipping addresses; documentation that is photocopies or lacking essential information; lack of rotation of duties; unauthorised changes to systems or work practices.