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Procedure:	<i>Joint Cumbria Police Authority and Cumbria Constabulary Anti Fraud and Corruption Procedure.</i>
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Supporting information also in policy library:	<i>Joint Cumbria Police Authority and Cumbria Constabulary Anti Fraud and Corruption Policy.</i>
	<i>Joint Cumbria Police Authority and Cumbria Constabulary Professional Standards Confidential Reporting Policy.</i>
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Joint Cumbria Police Authority and Cumbria Constabulary Anti Fraud and Corruption Procedure

This procedure has been written to support the Joint Cumbria Police Authority and Cumbria Constabulary Anti Fraud and Corruption Policy, which is available for further clarification and guidance in the Policy Library.

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1. THE POLICE AUTHORITY and CHIEF CONSTABLE

Cumbria Police Authority and the Chief Constable have agreed a joint policy against Fraud and Corruption. In summary, the Authority and Chief Constable will not tolerate fraud or corruption in the administration of their responsibilities, and expect staff to take positive action wherever fraudulent or corrupt activity is suspected.

The Authority and Chief Constable are clear that Misconduct Procedures will be invoked where improper behaviour is indicated, and that if there is evidence of criminal behaviour this is prima facie gross misconduct requiring immediate action to be taken where suspension or summary dismissal are likely. A criminal investigation will always be pursued where evidence of criminal behaviour is evident.

The Anti Fraud and Corruption Procedure provide guidance to all officers and staff to ensure adherence to the policy.

2. WHAT IS MEANT BY FRAUD AND CORRUPTION?

Fraud and Corruption are defined in section 4 of the policy.

Fraudulent or corrupt acts may include:

- **System Issues** ie where a process/system exists which is prone to misuse/abuse by either employees or public, (eg misuse of the Police National Computer).
- **Financial Issues** ie where individuals or companies have fraudulently obtained money from the Authority, (eg invalid invoices/work not done).
- **Equipment Issues** ie where Authority equipment is used for unauthorised personal use, (eg personal use of the organisation's assets - vehicles/computers/telephones etc).
- **Resource Issues** ie where there is a misuse of resources, (eg theft of cash/assets).
- **Other Issues** ie activities undertaken by Officers/Police Staff/Special Constables/employees of the Police Authority or Constabulary which may be: unlawful; against policies or procedures; fall below established standards or practices; or amount to improper conduct, (eg receiving unapproved hospitality).

3. YOUR DUTY

It is the **duty** of everyone:

- Not to commit or connive at any fraudulent or corrupt act.

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- To raise with a senior officer or manager or the people listed in section 4 of this procedure (Contacts), any suspicion of improper activity which indicates fraudulent or corrupt behaviour on the part of a colleague or an external third party.
- Not to discuss suspicions of improper practice other than with a senior officer or manager or the people listed in section 4 (Contacts).
- When a senior officer or manager, to investigate or cause to be investigated, any such suspicion which has been raised with them.
- To maintain and constantly monitor the necessary controls to guard against fraud and corruption, which are laid out in the Authority and Constabulary's procedural documentation, principally Police Regulations, the Police Staff Manual, Standing Orders in Relation to Contracts and the Financial Regulations/Rules.
- Not to authorise payments due to them self.
- Where possible, to split functions involving the custody of resources between two members of staff (for example the order and certification of receipts of goods; or the receipt and banking of cash).
- As a public servant, to assess the needs of the public, partners and our suppliers impartially, professionally and without personal prejudice and to determine the outcome of competitive situations with these same qualities.
- When private or personal interests arise in any matter which presents when at work, not to let those interests influence actions on behalf of the Police Authority or the Chief Constable. (The test is – “can I justify my actions if they become public?” If in doubt, consult your manager/supervisor).
- To adhere to the guidelines below regarding ‘Special Interests’ and offers or acceptance of hospitality and gifts.

4. WHAT TO DO IF YOU SUSPECT FRAUD OR CORRUPTION

The Public Interest Disclosure Act 1998 provides legal protection for employees who raise genuine concerns in relation to suspected fraud and corruption issues the Joint Police Authority and Constabulary Professional Standards Confidential Reporting Policy provides further guidance.

If you have reason to suspect fraud or corrupt activity on the part of a colleague, you should raise the matter discreetly and as soon as possible with your

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Departmental Director or Area Commander or another more senior manager. If you feel that immediate contact with any of those listed above is inappropriate under the circumstances, the following people are also directly approachable.

	<u>CONTACT</u>	<u>TELEPHONE NUMBER</u>
Constabulary	The Deputy Chief Constable	01768 21 7008
	The Director of Professional Standards	01768 21 7731
	The Director of Personnel & Development	01768 21 7101
	The Director of Legal Services	01768 21 7209
	The Director of Finance & Resources	01768 21 7005
Police Authority	The Treasurer of the Police Authority	01768 21 7631
	The Chief Executive (Monitoring Officer), Cumbria Police Authority	01768 21 7734
	The Police Authority's Internal Auditor	01228 60 6280
Staff Associations	For Police Officers – Police Federation	01768 21 7448
	For Police Staff – UNISON	01768 21 8000 or 8002
<p>Confidential internal reporting to the Professional Standards Department is also available by ringing x7716 or by the confidential e-mail reporting system accessed via the PSD intranet site.</p>		

In ordinary circumstances, these are the normal points of contact for these issues in the Constabulary and Authority, however in an exceptional case if an individual feels that concerns cannot be raised through any of the above routes, then the following external organisations offer alternative confidential 'helpline' services. When contacting external organisations individuals must take care to ensure that *confidential information* is not disclosed.

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<u>EXTERNAL CONFIDENTIAL HELPLINE</u>	
CONTACT	TELEPHONE NUMBER
Public Concern at Work - a registered charity.	0207 404 6609
The Audit Commission – Whistle Blowers Hotline	0845 052 2646

5. WHAT TO DO IF A MEMBER OF STAFF RAISES CONCERNS WITH YOU

If an allegation of fraud or corruption is made to you as a line manager or senior manager the following personnel must be consulted with a view to determining the appropriate investigative response and whether the Internal Auditor should become involved or a criminal investigation undertaken.

For the Authority

Members and staff of the Police Authority must raise issues with the Chief Executive and Monitoring Officer or the Treasurer.

For the Constabulary

Police officers and police staff must contact either the Director of Professional Standards or the Director of Finance & Resources.

Notwithstanding the above procedure the manager may feel, due to the nature of the allegation, that it is inappropriate to inform the personnel listed and in such exceptional circumstances any other of the contacts listed in section 4 above may be informed.

Arrangements will then be made to:

- Deal promptly with the matter
- Record all evidence received
- Ensure the evidence is sound and adequately supported
- Ensure the security of all evidence collected
- Advise the Treasurer (Police Authority) and the Internal Auditor

6. ADVICE TO MEMBERS OF THE PUBLIC

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In the event of a member of the public becoming suspicious of fraudulent or corrupt administrative or financial activity within the Police Authority or the Constabulary, the matter should be reported to the Director of Professional Standards Department in the first instance in the case of the Constabulary and the Monitoring Officer in the first instance in the case of the Authority. This policy is **NOT** a substitute for the normal process for complaints against the police under the Police Reform Act 2002, but complementary to them.

7. KEEPING OF RECORDS

If you are a Director or Commander you must make arrangements for the lodging and retention of notification of offers of hospitality and gifts (see sections 10 and 11 below) offered and declined. Declaration of Interests forms will be completed by line managers for relevant staff (see section 15 – Chief Inspectors and above, Police Staff grade SO1 and above and other staff who are nominated due to their role in relation to the awarding of contracts), the forms will be kept centrally by the PSD. They will remain confidential subject to inspection by Chief Officers, internal / external audit or other persons undertaking approved investigations.

The Chief Executive and Monitoring Officer to the Authority will maintain a Register of Members' Interests which will include details of hospitality and gifts received above a certain level (see sections 16 and 17). These are available for public inspection.

8. SPECIAL INTERESTS

The law (Section 117 of the Local Government Act 1972) specifically requires officers, employees and members to disclose in writing any financial interest (direct or indirect) which they may have in any contract the Authority has entered into, or may enter into, and prevents the acceptance of any fees or rewards whatsoever other than proper remuneration from their employer.

Interests other than financial can be equally as important – and include for example, kinship, friendship, membership of a society or association, or trusteeship and so on. Again, the individual must judge whether the interest is sufficiently close as to give rise to suspicion, or create a perception that a transaction can give rise to suspicion, but it is always better to err on the side of caution than to deal with a challenge after the event. If a matter which involves such intangible interests arises at a meeting of the Authority in which you are a participant, you must orally disclose that interest and ensure that it is minuted in the record of the meeting.

For a number of Constabulary and Authority posts, the police officer or member of police staff will be required to complete a register of interests form (see section 15). This will apply to senior posts - all police officers attaining the rank of Chief Inspector and above, police staff of grade SO 1 and above

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and other designated posts e.g. staff who let contracts. The forms will be completed by the individuals line manager following a meeting, it is important that the responses on completion of the form is done honestly and that it is updated if changes to an individuals circumstances occur.

The Constabulary policies and procedures re Vetting, Secondary Employment and Business Interests, Revelation of Criminal, Misconduct and Discipline Findings to the CPS, Reporting Criminal Proceedings and Other Offences, and Professional Standards Confidential Reporting will be used to support the obligations of section 117.

9. LOCAL GOVERNMENT AND HOUSING ACT 1989 - POLITICALLY RESTRICTED POSTS (PORP)

Under section 2 of the Local Government and Housing Act 1989, a post will be designated as a PORP if it is either:

- A specified post;
- A post whose remuneration is or exceeds a specific level i.e. the equivalent of SCP44;
- A sensitive post.

Posts that have been designated as PORPs will include reference to this fact in the job description and post holders will be informed of the restrictions which apply.

The political restrictions:

- 1) Designation as a PORP means that the post holder is disqualified from election to a Local Authority or National and European Parliaments. (This does not include Parish or Community Councils).
- 2) Designation as a PORP also restricts PORPs from:
 - Candidature for public elected office (other than to a Parish or Community Council);
 - Holding office in a political group;
 - Canvassing at elections;
 - Speaking or writing publicly (other than in an official capacity) on matters of party political controversy.

In addition to the specific restrictions placed on an individual who is nominated as a PORP, the act restricts Local Authorities and any of their staff (which will include all police authority staff and police staff as employees of the Police Authority) issuing material which is likely to affect public support for a legally-constituted political party.

Police Officers are subject to the restrictions placed on their private lives in accordance with Police Regulations 2003, Regulation 6 - Schedule 1.

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10. OFFERS AND ACCEPTANCE OF HOSPITALITY

It is essential when dealing with organisations or individuals likely to benefit from the goodwill of the Authority or existing/potential contractors that:

- You are never placed in the position of owing favours.
- Your conduct does not allow for any suspicion that you could be unfairly favouring any particular third party over others.

Whilst a working lunch is often an acceptable part of normal working relations, the following should be avoided:

- Hospitality received which constitutes more of a social function.
- An excess of hospitality, both in terms of frequency or lavish meals.
- Hospitality which could give rise to suspicions of favour.

If there is any doubt as to whether an invitation should be accepted, your line manager/supervisor should be consulted. Area Commanders and Directors and the Chief Executive on behalf of Members and Authority staff, will maintain a register of hospitality which will record all offers of hospitality offered and accepted, the register will be subject to periodic inspection by Professional Standards Department for the Constabulary and the Monitoring Officer for the Authority.

The Acceptance of Gifts, Gratuities, Hospitality and Discounts guide and the Sponsorship guide provide related guidance concerning this issue.

11. OFFERS AND ACCEPTANCE OF GIFTS

You must not accept gifts whilst acting in an official capacity. Gifts delivered should be returned to the sender with an appropriately worded letter, and your line manager must be informed. Gifts include loans, legacies, favours such as trading discounts and free or discounted admission to sporting or other events. In the event of a legacy from clients or others who have benefited from the services of the Authority, the Chief Constable must be informed immediately. Where refusal of a gift might cause actual offence, steps are likely to be taken to transfer the value of the gift to a charity as a gift from the Authority.

The receipt of minor articles, often by way of trade advertisement, which will be used on the Authority's business (diaries, calendars, office requisites etc.) will not be regarded as gifts. If there is any doubt, the items should be refused, and the principles outlined here apply equally if gifts are offered to your immediate family but might be perceived as being an inducement, given your relationship with the donor. Area Commanders and Directors and the Chief Executive on behalf of Members and Authority Staff will maintain a

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Register of Gifts which will record all gifts offered and accepted. The register will be subject to periodic inspection by the Professional Standards Department for the Constabulary and the Monitoring Officer for the Authority.

The Acceptance of Gifts, Gratuities, Hospitality and Discounts guide and the Sponsorship guide provide related guidance concerning this issue.

12. REVIEW OF THE ARRANGEMENTS

These arrangements will be included in the list of Risk Items from which the recurring review programmes of Internal Audit are selected.

13. ANTI FRAUD AND CORRUPTION STRATEGY

To support the Policy appropriate resources will be committed to fraud and corruption prevention and detection (Anti-Corruption Unit, PSD). A series of interrelated procedures designed to frustrate any attempted fraudulent or corrupt act will be put in place by the Authority and the Chief Constable and investigation of any instances or suspected instances of fraud and corruption which may arise will be undertaken in accordance with this policy.

13.1. Measures

The Police Authority and the Chief Constable will maintain appropriate procedures and documentation to assure the awareness of all staff as to the Authority's requirements.

The Authority and Constabulary will maintain financial and other control measures, which will be subject to internal and external audit and scrutiny of its practices and their outcomes. It will co-operate with these agencies in the legitimate pursuit of their interests and, in particular, it will maintain an Audit Committee to oversee the processes of audit of the Authority's business.

13.2. Detection and Investigation

The Authority and Constabulary will always investigate any actual or suspected cases of fraud or corruption as potentially criminal activity, and implement misconduct procedures where appropriate.

Specifically:

1. Officers and Staff are required by Financial Regulations to report all suspected irregularities to the senior manager in the Department/Area who will immediately report the matter to the Director PSD or Director Finance & Resources who will instigate the necessary investigation.
2. Misconduct Procedures will be used where the outcome of the investigation indicates improper behaviour.

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3. Where financial or other impropriety is discovered and sufficient evidence exists to suspect that a criminal offence may have been committed, a criminal investigation will be pursued.

13.3. Supporting the Strategy

13.3.1 External Bodies

The Authority will co-operate with the following external bodies, whose prerogatives extend over the conduct of the Authority's business. The list is not exhaustive.

- a) Externally appointed auditors and the Audit Commission
- b) HM Inspector of Constabulary
- c) Independent Police Complaints Commission
- d) HM Revenue and Customs
- e) Department of Social Security/ Contributions Agency
- f) The Local Government Ombudsman
- g) The Courts
- h) The Crown Prosecution Service

13.3.2 Internal Bodies

The internal bodies set out below each have a responsibility to ensure that the Authority and the Constabulary each comply with their respective elements of their Anti Fraud and Corruption Policies:-

- a) **Professional Standards Department (PSD)**
Deals with public complaints against any member of staff under the direction and control of the Chief Constable. It comprises an Anti-corruption Unit, which has a professional investigation capability and a General Security, Vetting and Disclosure Section responsible for security of information and assets. Unauthorised or corrupt disclosure of information will be investigated.
- b) **Internal (Management) Audit**
Provided under service level agreement from Cumbria County Council, Internal (Management) Audit are responsible for compliance audits in respect of regularity and systems.
- c) **Sickness Monitoring Group**
Assesses the use and abuse of the sickness and medical retirement processes.
- d) **Police Authority Treasurer**
Chief Financial Officer for the Authority with a legal responsibility for the integrity of financial administration (including the legality of expenditure) and the provision of the Internal Audit function.
- e) **Monitoring Officer (Chief Executive to the Authority)**

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This is the Statutory Officer whose role is to warn of illegality or maladministration, (whether actual or potential), in matters touching the business or responsibilities of the Authority.

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14. THE SEVEN PRINCIPLES OF PUBLIC LIFE (NOLAN COMMITTEE)

Selflessness

Holders of public office take decisions in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family or their friends.

Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in their performance of the official duties.

Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership

Holders of public office should promote and support these principles by leadership and example.

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15. REGISTER OF INTERESTS FORM

**CONFIDENTIAL
CUMBRIA CONSTABULARY**

REGISTER OF INTERESTS

Cumbria Constabulary has adopted an Anti Fraud and Corruption Policy and Code of Conduct consistent with the highest levels of conduct from its employees.

In accordance with this policy (which includes the avoidance of suspicion of fraudulent or corrupt behaviour), you are asked to indicate or disclose any interest which may give rise to any suspicion of favouritism or other breach of the seven principles of public life (Nolan Committee) of this policy.

A. PERSONAL / POST DETAILS

Name: _____.

Job / Title: _____.

Grade / Rank : _____.

B. FINANCIAL INTERESTS

It is important that employees are seen not to have a financial interest in any aspect of procurement carried out by the Authority.

1. Do you have secondary employment or trade on a self-employed basis or as a partner in a firm? If so indicate your role and the employer's / firm's address and nature of business.

Tick the appropriate response.

	No I do not.
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	Yes I do.
	Details:

"Cumbria Constabulary supports our staff fulfill their potential outside the workplace"

2. Do you hold any paid or unpaid directorships? If so indicate the companies or charity concerned and the nature of their business.

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Tick the appropriate response.

	No I do not.
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	Yes I do.
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	Details:
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“Cumbria Constabulary acknowledges the important contribution our staff make by supporting companies and charities in the community”

3. Are you a member of an unlimited company or a company limited by guarantee (which may include a charity that has been set up in accordance with *company rules*)? If so name the company and the nature of its business.

Tick the appropriate response.

	No I do not.
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	Yes I do.
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	Details:
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“Cumbria Constabulary acknowledges the value to be gained by our staff through the membership of a company”

4. Do you through shareholding or your nominees hold a significant financial interest in a company? ‘Significant’ means a shareholding in excess of 10% of the nominal issued share capital of the company – normal shareholding in companies quoted on the Stock Exchange are therefore most unlikely to fall under this heading.

Tick the appropriate response.

	No I do not.
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	Yes I do.
	Details:

“Cumbria Constabulary recognises the right of its staff to hold and deal in company shares”

5. To your knowledge do your – spouse / partner have an interest declarable under 4 above? If so give details of the individual, their relationship to you and the nature of the interest.

Tick the appropriate response.

	No I do not.
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	Yes I do.
	Details:

“Cumbria Constabulary recognises the rights of a spouse or partner of our staff to hold and deal in company shares”

C. OTHER INTERESTS

It is important that staff in influential positions should not be perceived as being open to ‘influence’ in the provision of the Constabulary’s service.

6. Indicate below your membership of any societies / associations / clubs, which in your opinion give rise to unwarranted suspicions of partiality in the discharge of the duties of your post.

Tick the appropriate response.

	I do not belong to a society / association /club that could give rise to suspicions about my partiality in the discharge of my post.
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	Yes, I do belong to the following society(s) / association(s) / club(s) that could give rise to
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	unwarranted suspicion about my partiality in the discharge of my post.
	Details:

“Cumbria Constabulary recognises the value of its staff belonging to societies / associations and clubs in the community”

7. Indicate below if you are a member of a Local Authority or statutory undertaking (including ministerial appointee to any statutory body or undertaking) which is constituted to discharge or assist in discharging a statutory function (eg member of a statutory working group [ie Food & Drink Advisory Panel], lay-minister etc).

Tick the appropriate response.

	I am not a member of a Local Authority or statutory undertaking constituted to discharge or assist in the discharging a statutory function.
--	--

	Yes, I am a member of a Local Authority or statutory undertaking constituted to discharge or assist in the discharging a statutory function.
	Details:

“Cumbria Constabulary recognises the value and benefit provided to the community by the Local Authority’s and statutory body’s working within our community”

Signed:

Line Manager

Date:

The form is for completion by all Police Staff of grade SO1 and above and all Police Officers attaining the rank of Chief Inspector and above, together with any other member of staff nominated by their line manager as having decision making or influence powers in respect of the selection of suppliers of goods and / or services to the Constabulary or Police Authority. The form will be completed by the Line Manager following a meeting with the member of staff.

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The forms will be forwarded to the Director Professional Standards Department when complete for retention.

16. DECLARATION OF RELATED PARTY TRANSACTIONS 200+ / ++ FORM



CUMBRIA POLICE AUTHORITY

Declaration of Related Party Transactions 200+ / ++

Name:- _____

DECLARATION:-

In answering each question please state the dates, amounts and any other relevant details.

Have you or any partnerships, companies, trusts or any other entities in which you have a controlling interest undertaken any transactions with Cumbria Police Authority during the 200+ / 200+ financial year, which should be disclosed under the criteria specified in the covering letter?

Have any of your close family, members of your household or any partnerships, companies, trusts or any other entities in which they have a controlling interest undertaken transactions with Cumbria Police Authority in the 200+ / 200+ financial year, which should be disclosed under the criteria specified in the covering letter?

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Are you involved with any interest groups which have undertaken transactions with Cumbria Police Authority in the 200+/ ++ financial year, which should be disclosed under the criteria specified in the covering letter?

Have you received any services free of charge to which a charge is normally levied?

Any other relevant information should be disclosed in the space below.

Signed:-

Date:-

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Please return the signed form to the Monitoring Officer by 4 April 20++.
Please note that nil returns should still be submitted.

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17. CODES OF CONDUCT UNDERTAKING FORM



CUMBRIA POLICE AUTHORITY

CODES OF CONDUCT UNDERTAKING

I,having become a Member of Cumbria Police Authority, declare that I will duly and faithfully fulfil the requirements of this role according to the best of my judgement and ability and within codes adopted by the Authority:

I undertake to observe and comply with the model Code of Conduct (1) expected from Members of a Police Authority, as adopted by the Cumbria Police Authority; of which I am supplied with a copy.

I confirm receipt of a form (2) for notification by a member of their financial and other interests under the Police Authorities (Model Code of Conduct) (England) Order 2001; which I will complete and return to the Monitoring Officer for entry in the Authority's Register. I undertake to update the Monitoring Officer on any changes to those notifiable interests.

I further undertake to observe and stand by the Anti-Discrimination Code of Conduct (3) adopted by the Cumbria Police Authority for its members and staff, of which I am also supplied with a copy.

I finally undertake to observe and stand by the Member-Officer Protocol (4) adopted by the Cumbria Police Authority, of which I am additionally supplied with a copy.

Signed Date

This undertaking was made and signed before me

Signed Date

Proper Officer

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