

Title: Anti-Fraud, Bribery and Corruption Policy

Summary: The Service is committed to protecting the public funds entrusted to it. This Anti-Fraud, Bribery and Corruption Policy outlines the Service’s commitment to creating an anti-fraud culture and maintaining high ethical standards in its administration of public funds. A culture of honesty and openness is a key element in tackling fraud.

Further Information: This Policy should be read in conjunction with the other relevant policies, for example, the Protected Reporting (Whistleblowing) Policy.

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1 Policy Statement

Bedfordshire Fire and Rescue Service (the Service) is committed to the highest possible standards of integrity, openness, probity and accountability.

Our communities expect the Service to conduct its affairs with integrity, honesty, openness and to demand the highest standards of conduct from those working for it.

The Service recognises that sound systems of public accountability are vital to effective management and to maintain confidence in the Service.

In order to prevent, discourage and detect fraud, the Service has in place, and will continue to develop appropriate controls and procedures. These are inter-related and are designed to frustrate fraud, bribery or corruption. They cover culture, prevention, detection and training.

2 Organisational Responsibility

- 2.1 The Assistant Chief Officer is the Principal Officer with the responsibility needed to be the designated manager responsible for ensuring this policy is effectively implemented. ACO

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| 2.2 Adequate resources, including finance, will be made available to enable this policy to be effectively implemented. | Corporate Management Team |
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3 Policy Text

3.1 Aim of the Policy

This Policy aims to:

- avoid the consequences of fraud, bribery and corruption, which are costly, time consuming, threaten morale and ultimately damage the standing and reputation of the Service;
- encourage confidence in raising concerns of fraud, bribery or corruption;
- reassure employees that if they raise any concerns in good faith and reasonably believe them to be true, they will be protected from possible reprisals or victimisation; and
- provide an effective mechanism for members of the public to raise genuine and serious concerns.

3.2 Interface within Other Polices

In respect to issues of Member conduct, then these are matters which are dealt with through the Audit and Standards Committee of the Bedfordshire Fire and Rescue Authority (the Authority). Please refer to (<http://www.bedsfire.com/CombinedFireAuthority/StandardsCommittee/Pages/default.aspx>) for further information or speak to the Business Support Manager on (01234) 845000.

The Service operates a Complaints Policy and Procedure. This enables members of the public to raise any questions or make complaints about the performance of the Service. It also has a Whistleblowing Policy which encourages staff to raise concerns in good faith. The Whistleblowing Policy can be found at [http://www.bedsfire.com/CombinedFireAuthority/CFAHandbook/Documents/CFAHand12/Protected%20Reporting%20\(Whistleblowing\).pdf](http://www.bedsfire.com/CombinedFireAuthority/CFAHandbook/Documents/CFAHand12/Protected%20Reporting%20(Whistleblowing).pdf)

Members of the public are not precluded from using the Whistleblowing Policy, but should only do so where they feel that the Complaints Policy is not appropriate to the concern that they wish to raise.

There is significant similarity for employees in respect to the Whistleblowing Policy and this Anti-Fraud, Bribery and Corruption Policy. The procedure is almost identical, as is the protection afforded to an employee raising a genuine concern in good faith. In essence the Whistleblowing Policy is much broader and relates to significant concerns. Fraud is a protected disclosure under that Policy.

3.3 Who is covered by this Policy?

This Policy applies to all employees of the Authority, whether temporary or permanent. It also applies to all Members including independent and co-opted

Members, consultants, contractors, agents, partner organisations, suppliers, and the users of our Service.

In addition, the Authority also expects our communities to be honest in their dealings with the Service.

3.4 What is Fraud, Bribery and Corruption?

3.4.1 The Fraud Act 2006 Defines Three Main Types of Fraud:

- Fraud by false representation** – where an individual dishonestly and knowingly makes a representation that is untrue or misleading;
- ii. **Fraud by wrongfully failing to disclose information** – where an individual wrongfully and dishonestly fails to disclose information to another person when they have a legal duty to disclose it, or where the information is of a kind that they are trusted to disclose it, or they would be reasonably expected to disclose it;
 - iii. **Fraud by abuse of position** – where an individual who has been given a position in which they are expected to safeguard another person's financial interests dishonestly and secretly abuses that position of trust without the other person's knowledge.

Fraud may involve one or several people, whether from within or external to the Service and examples of fraud include:

- Unlawfully obtaining money or property belonging to the Service.
- Forgery.
- Falsification of records for personal gain.
- Deliberate falsification of facts or manipulation of management information, including personal expenses.
- Abuse of position.
- Failure to disclose information when there is a legal duty to do so.

3.4.2 Bribery and Corruption:

The Bribery Act 2010 came into force on 1st July 2011 and replaces the Prevention of Corrupt Practices Acts of 1889 and 1916 which are repealed. The Act makes provision for offences relating to bribery and covers the following:

- Paying Bribes
- Receiving Bribes
- A Corporate offence of failure to prevent bribery
- Bribery of a foreign official

Although this document refers to fraud, bribery and corruption, as defined, the principles can be applied to all financial malpractice. This includes a wide range of irregularities and criminal acts including theft of property, false accounting, obtaining by deception.

For further guidance on Anti Bribery procedures for managers and employees, service order V10 27 should be referred to.

3.5 Culture and Stance Against Fraud, Bribery and Corruption

Responsibility for an anti-fraud culture is a shared duty of all those involved in giving political direction, leadership, determining policy and management.

Both Members and Officers will lead by example, ensuring that the adopted constitution is adhered to.

This Policy supports a culture to enable concerns to be raised.

The Fire and Rescue Authority has in place an Audit and Standards Committee whose monitoring role is important to the effectiveness of this Policy.

More information concerning the Audit and Standards Committee can be found at <http://www.bedsfire.com>

The Service believes that the maintenance of a culture of honesty and openness is a key element in tackling fraud. The Codes of Conduct for Members and staff are based on the Principles of Standards in Public Life formulated by the 1995 Nolan Committee, as follows:

- Honesty
- Integrity
- Selflessness
- Objectivity
- Openness
- Accountability
- Leadership

3.6 Corporate Framework and Culture

The Authority has a range of interrelated policies and procedures that provide a corporate framework to counter fraudulent activity. In addition to this Policy, these have been formulated in line with appropriate legislative requirements, and include:

- The Authority's Constitution;
- Codes of conduct for Members and Officers;
- Accounting procedures and records;
- Sound internal control systems;
- An effective internal audit service;
- Effective recruitment and selection procedures;
- A Disciplinary Procedure;
- A Whistleblowing Policy;

- The Regulation of Investigatory Powers Act (RIPA) Procedure; and
- Training

3.7 Prevention

The Service recognises that fraud, bribery and corruption are costly, both in terms of risk to reputation and financial losses. The prevention of fraud is therefore a key objective of the Service and respective roles and responsibilities are outlined below.

3.7.1 Employees of the Authority

A key preventative measure in the fight against fraud, bribery and corruption is to take effective steps at the recruitment stage. Staff recruitment will be undertaken in accordance with the Service's policies for Recruitment and Selection. Whenever possible, written references should be obtained regarding the known honesty and integrity of potential members of staff, before formal employment and offers are made. In this regard, temporary staff should be treated in the same manner as permanent staff.

All staff must abide by the Service's Code of Ethics for Employees, which sets out requirements on personal conduct. All staff are expected to follow the codes of conduct laid down by their respective professional institutes.

The Service recognises that employees are often the first line of defence in preventing fraud. Financial Regulations place responsibility for fraud prevention on all employees. Staff should therefore be alert to the possibility of fraud and to report any concerns.

The Service has in place disciplinary procedures for all staff. Those found to have committed any acts of impropriety will be dealt with in accordance with these procedures. Where criminal activity is suspected or found, the matter will be referred to the Police for investigation and possible prosecution, in accordance with the Criminal Acts Procedure. In addition, restitution will be sought from those who are found to have perpetrated fraudulent acts.

All staff must operate within Section 117 of the Local Government Act 1972, regarding the disclosure of pecuniary interests in contracts relating to the Authority, of the non-acceptance of any fees, gifts, hospitality or any other rewards, other than their proper remuneration. These requirements are set out in the Authority's Code of Conduct for Employees. The Monitoring Officer will also seek annual returns from more senior staff in respect to financial dealings.

3.7.2 Internal Control

The Authority has a Constitution, which includes financial regulations, contract regulations and accounting procedures.

The Treasurer is the designated officer having a statutory responsibility under Section 112 of the Local Government Act 1972, to ensure proper arrangements are made for the Authority's financial affairs. In addition, under the Accounts and Audit Regulations 2011, the Authority is required to maintain an adequate and effective internal audit of its financial records and systems of internal control.

The Authority's Monitoring Officer is the designated Officer under the Local Government and Housing Act 1989.

The Authority has developed systems and procedures that incorporate effective and efficient internal controls. All employees are required to ensure that these controls are properly maintained. In particular, employees are responsible for the maintenance of controls within their own jurisdiction. In addition employees should alert line managers where they believe the opportunity for fraud exists because of poor procedures or controls. The Authority's internal and external auditors independently monitor compliance with the overall control environment and advise upon the continuing effectiveness and appropriateness of these controls.

The Authority's formal Annual Governance Statement is a key document which is approved annually and included within its financial accounts.

3.7.3 Combining with others to Prevent and Fight Fraud

There are a variety of arrangements in place which facilitate the regular exchanges of information between the Service and other local authorities and agencies, for the purpose of preventing and detecting fraud. These involve national, regional and local networks of investigators such as internal auditors, trading standards officers, housing benefits investigators etc.

The Service operates a verification framework. Data matching will also be undertaken. This is recognised as an important tool in the prevention and detection of fraud, and is used by many other local authorities. The Cabinet Office has the Code of Data Matching Practice for its National Fraud Initiative (NFI), which is recognised by the Information Commissioner as complying with Data Protection legislation. This was previously managed by the Audit Commission.

3.8 Detection, Investigation and the National Fraud Initiative (NFI)

All the Service's control systems have been designed to deter and detect any fraudulent activity, but they can never provide a complete protection against fraud, bribery or corruption. It is often the alertness of employees and/or the public that detects fraud, bribery or corruption and enables appropriate remedial action to take place. Members and employees must notify an Authorised Officer as soon as possible if fraud, bribery or corruption is suspected. This process is covered more fully below and in Appendix C.

All allegations of fraud, bribery or corruption will be investigated. The Police will decide upon criminal prosecutions and the Service's internal disciplinary procedures will be implemented in addition. In appropriate cases, the Service or its insurers will take civil action to recover losses arising from financial impropriety.

The National Fraud Initiative (NFI) is a data matching exercise that the Authority participates in. It compares information held by different organisations to identify potentially fraudulent claims and overpayments. Examples of data used include payroll, pension and benefit payments. The NFI works within a strong legal framework, including the Data Protection Act 1998, which protects individuals' personal data.

The Authority's Principal Officer lead for NFI is the ACO and the Member lead is the Chair of the Audit and Standards Committee.

All data matches are followed up.

3.9 Training

The Service provides induction and follow-up training for all Members and employees that covers this policy and the concepts of internal controls. A special emphasis will be placed on employees involved in internal control systems to ensure that their particular responsibilities and duties are regularly highlighted and reinforced.

3.10 Gifts and Hospitality

It is important that employees avoid generating the impression or suspicion that they have a conflict of interest. They must not give the impression that they have been or may be influenced by any gift, hospitality or other consideration to show favour or disfavour to any person or organisation while acting in an official capacity. Employees must not encourage any gift, reward or benefit from any member of the public or organisation with whom they have been brought into contact through their official duties.

Guidance is issued upon the declaration of gifts and hospitality and registers exist for employees who must always seek advice before accepting any gifts or hospitality.

3.11 Assurances for Employees Making Disclosures under this Policy

If you do report a suspected fraud, you will not be at risk of losing your job or suffering any form of retribution as a result, provided that:

'Your disclosure is made in good faith; you reasonably believe that the information in your disclosure, and any allegation contained in it, is substantially true; and you are not acting for personal gain'.

The Public Interest Disclosure Act 1998 protects employees against detrimental treatment or dismissal. This Policy has been introduced in accordance with the Act. For further information upon the Act please contact the Business Support Manager or the Governance Team. Alternatively, please go to Public Concern at Work (www.pcaw.org.uk).

3.12 Anonymous Allegations of Suspected Fraud, Bribery or Corruption

The Service encourages employees to disclose their names when reporting a suspected fraud. Concerns expressed anonymously are much less powerful, and are often more difficult to investigate or substantiate. Feedback cannot be provided.

In considering whether to investigate anonymous allegation, particular consideration will be given to:

- the seriousness of the issues raised;
- the credibility of the concern;
- the likelihood of substantiation from other sources;
- the ability to discover the facts; and
- the justification for maintaining anonymity.

3.13 Confidentiality

The Service will treat all reports of suspected fraud in a confidential and sensitive manner. The identity of the individual may be kept confidential provided this does not hinder or frustrate any investigation. However, there will be occasions where the identity of the individual needs to be revealed. For example, where the individual is required to give a witness statement or give evidence at a formal hearing, where allegations of misconduct or criminal activity are involved. Serious fraud will be referred to the Police for criminal investigation.

3.14 Untrue Allegations of Fraud

If allegations are made in accordance with Paragraph 12 above, but are not confirmed by the investigation, no action will be taken against the complainant. Employees are protected by the Whistleblowing Policy of the Service. If, however, malicious, vexatious, mischievous or reckless allegations are made then other action may be considered, if the complainant is an employee.

3.15 How to Report a Suspected Fraud

As a first step, you should normally raise concerns with your immediate manager. This depends, however, on the seriousness and sensitivity of the issues involved and any potential conflicts of interest.

Alternatively, you may raise a concern directly with:

- i. Chief Fire Officer
- ii The Authority's Head of Finance/Treasurer
- iii The Authority's Monitoring Officer
- iv Head of Internal Audit (currently externally provided)
- v The Chair of the Authority or the Chair of the Audit & Standards Committee
- vi Any Principal Officer

This contact may be by telephone or face-to-face¹, but serious concerns are better raised in writing. Those making a report of a suspected fraud are asked to set out the background and history of their concern, giving names, dates and places where possible, and the reason why they are particularly concerned about the situation. The earlier the concern is expressed, the easier it is to take action.

¹ Full contact details available from The Service Assurance Manager/Strategic Support Team: Tel No – 01234 845000

The above are Authorised Officers under the Procedure set down in Fraud Response Plan detailed in Appendix C. Your immediate Manager will consult with an Authorised Officer.

Concerns of a suspected fraud may be put in writing or raised initially orally, and then confirmed in writing. Written allegations should include:

- all relevant background;
- the nature of the fraud and corruption that is alleged;
- relevant dates where possible;
- the names of individuals against whom the allegations are made; and
- any supporting evidence, including documentation.

Is proof of fraud needed?

When raising a concern you will not be expected to provide proof beyond reasonable doubt of an allegation, but you will need to be able to demonstrate that there are reasonable grounds for your concerns. Where possible notes should be kept of what the individual has seen, heard or reasonably believes. Notes should be dated and copies of all relevant information kept.

3.16 Allegation Concerning the Chief Fire Officer

Where an allegation is made concerning the Chief Fire Officer, then you should raise this with the Statutory Officers (Treasurer or Monitoring Officer), the Head of Internal Audit or the Chair of the Audit and Standards Committee.

3.17 How the Service Will Respond – The Fraud Response Plan

Please refer to Appendix C which outlines the procedure which will be followed.

3.18 Raising Concerns Externally

You are encouraged to raise any concerns internally. However, in certain circumstances the Public Interest Disclosure Act 1998 provides protection to employees who make certain disclosures outside the Authority. You can find out more information from the Service Whistleblowing Policy. In brief, an employee may consider this route, for example, when they have a justifiable concern that their disclosure would not be dealt with properly by the Authority, or that the Authority may be constrained in its statutory powers to address the concern adequately. The protection relates to financial malpractice, impropriety or fraud. A failure to comply with a legal obligation, criminal activity or a miscarriage of justice.

Our External Auditors KPMG LLP are the most likely body to be considered in instances of Fraud, Bribery, Corruption and misuse/abuse of public funds or powers. Their local contact details are:

KPMG LLP

<https://kpmg.com/uk/en/home/misc/contact-kpmg.html>

The National Audit Office has a dedicated Whistleblowers Hotline: 020 77987999.

Any employee who is considering making an external disclosure is encouraged to first take advice to ensure that the disclosure falls within the provisions of the legislation, and that all internal avenues have been fully explored. If an employee does decide to take the matter outside the Authority, they should ensure they do not disclose any confidential information.

3.19 Further Advice and Guidance

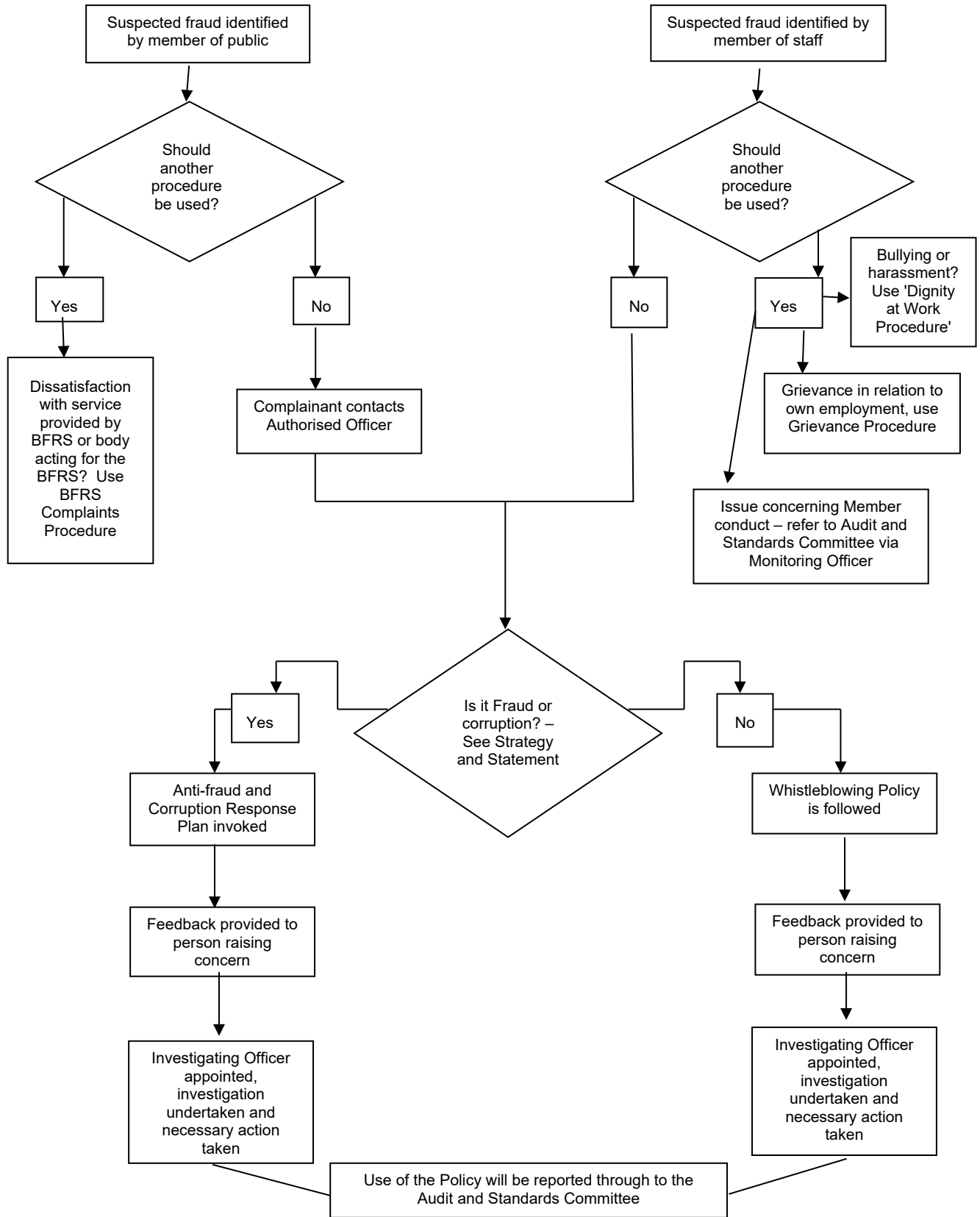
A process flow diagram and a check list of do's and don'ts is provided as a quick reference for employees at Appendices A and B respectively.

3.20 Who Can Provide Support or Advice (to Employees)?

- A colleague or friend,
- a trade union representative,
- the Service's Counselling Service available to employees through the Occupational Health Unit, and
- Service Chaplaincy.

APPENDIX A

ANTI-FRAUD AND CORRUPTION STRATEGY – FLOW CHART



CHECKLIST OF DO'S AND DON'TS

Do

- a. Make an immediate note of your concerns. Noting any documentary evidence which may exist.
- b. Think about the risks and outcomes before you act.
- c. Follow the guidance provided and contact the appropriate officer.
- d. Deal with the matter promptly if you feel your concerns are warranted.

Don't

- a. Do nothing.
- b. Be afraid to raise your concerns.
- c. Approach or accuse any individuals directly.
- d. Try to investigate the matter yourself.
- e. Use the Anti-Fraud, Bribery and Corruption Policy (or Whistleblowing Policy) to pursue a personal grievance.

ANTI-FRAUD AND CORRUPTION PROCEDURE (FRAUD RESPONSE PLAN)

1. How to Report a Suspected Fraud

Any suspicion of fraud or corruption will be treated seriously.

Your suspicion should be reported to your Line Manager or Authorised Officer. If you are not an employee then your suspicion should be reported to an Authorised Officer. Please refer to the Service Order V01 05 - Anti-Fraud, Bribery and Corruption Policy, particularly paragraph 16. Bribery is covered in detail under Service Order V10 27.

The Procedure below sets out to whom a disclosure should be made. Before reporting a suspected fraud, you should read the Service Order detailed in the above paragraph, particularly the guidance and flow chart.

2. What Will Happen Upon Disclosure?

The Authorised Officer will:

- i. Acknowledge receipt in writing within 10 days;
- ii. Make a record of the details of any oral disclosure and confirm these in writing to the Complainant within ten days;
- ii. The Authorised Officer will consult Internal Audit (unless the disclosure is made directly to Internal Audit, in which case Internal Audit shall consult with a further Authorised Officer). The Authorised Officer may determine that:
 - the disclosure should be investigated by Internal Audit;
 - the disclosure should be progressed under a different Bedfordshire Fire and Rescue Service procedure;
 - the disclosure is of such seriousness to refer to the Police;
 - the disclosure should be referred to the external auditors;
 - the disclosure should be the subject of an inquiry;
 - the disclosure is in accordance with the Anti-Fraud and Corruption Policy;
 - the disclosure can be resolved without investigation;
 - the disclosure can be dismissed upon substantive grounds, for example the inability to investigate; and
 - the disclosure should be referred to the Service's insurers.

3. Investigating Officer

Subject to paragraph 2(c), the Authorised Officer will identify an appropriate person (the Investigating Officer) to carry out any investigation, according to the nature of the issue. This will normally be a member of the Internal Audit Service.

Where, however, the Authorised Officer considers that the suspected fraud is of such seriousness to warrant referral to the Police, then an Investigating Officer may not be appointed.

4. Role of the Investigating Officer (Where Appointed)

The Investigating Officer will conduct an investigation into the suspected fraud, which will normally include:

- a formal meeting with the Complainant to discuss the disclosure;
- arrange interviews with relevant witnesses;
- ensure the complainant and any witnesses have the right to be accompanied by a representative/colleague at any meeting;
- establish the facts/obtain statements/collect all evidence;
- maintain detailed records of the investigation process;
- report findings in writing to the Authorised Officer;
- make any recommendations for action; and
- act as a witness at any subsequent disciplinary hearing if required.

(For complaints involving the Chief Fire Officer the report will be to the Chair of the Audit and Standards Committee.)

The Investigating Officer will confirm in writing to the Complainant:

- How the matter will be dealt with;
- the names of any other investigating officers;
- an estimate of the timescale for responding to the concerns raised;
- whether the complainant will be required to attend an investigatory interview and the right to be accompanied by a trade union representative or work colleague;
- any further information or evidence that the discloser is required to provide;
- details of employee support mechanisms and where further advice on the procedure can be obtained.

5. Witnesses

Where the investigation involves interviews with any witnesses, it will be the responsibility of the Investigating Officer to write to them confirming details of:

- the allegations under investigation;
- the procedure under which the investigation will be conducted;
- the right to be accompanied by a trade union representative or colleague at any investigation interview;
- details of employee support mechanisms.

Action	Timescale	By Who
Written acknowledgement of disclosure	10 working days	Authorised Officer
Notice to attend investigation interview	At least 5 working days	Investigating Officer
Investigation interviews	Within 20 working days of receipt of complaint	Investigating Officer
Report of Findings/ communicate outcome to complainant	30 days of receipt of complaint	Investigating Officer

Whilst the Investigating Officer will need to adhere to the timescales indicated, the nature of some serious concerns may require the investigation to take longer than a month. Some matters can be dealt with more speedily. The Complainant will be kept informed as to progress.

6. Liaison with External Audit and the Police

6.1 External Audit

The Authority has a duty to report all significant frauds to the external auditors.

6.2 Police

Where criminal activity is suspected or known, particularly if it is on a more than petty level, the Police must be involved and dependent on the severity and scale of the offence, will carry out investigations and institute criminal prosecutions. It is the policy of the Police to welcome early notification of suspected fraud. They will also advise on the most appropriate means of investigation. Initial contact with the Police will be undertaken by one of the Authority's statutory or principal officers, as may be appropriate in each individual case. This will be determined by the Chief Fire Officer, the Treasurer and the Monitoring Officer.

If the Police decide that formal investigation is necessary, all employees must co-operate fully with any subsequent requests or recommendations. All contact with the Police will usually be via the Investigating Officer.

Police investigation does not preclude internal disciplinary procedures. Co-ordination is essential to avoid prejudicing either and to optimise use of resources.

7. Report of Investigating Officer

As soon as the initial stage of the investigation has been completed, the Investigating Officer shall report to the Authorised Officer. This may lead to the Authorised Officer taking additional steps under paragraph 2(c).

A final report in writing shall be submitted by the Investigating Officer to the Authorised Officer as soon as reasonably practicable. The report shall be confidential and shall set out:

- Background to the allegations
- Key facts established
- Procedure followed

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- Key findings and conclusions
- Recommendations

The report will be reviewed by Internal Audit, the Chief Fire Officer, Treasurer and Secretary/Monitoring Officer.

In particular, consideration will be given to appropriate next steps as indicated in paragraphs 8 to 13 below. The report will be kept confidential to the Authority, unless disclosure is required for legal reasons.

Dealing with the Outcome of the Investigation

8. Misconduct

Where the investigation concludes that there is a case of misconduct to answer against an employee, then the Disciplinary Procedure shall be invoked.

If the disclosure is found to be malicious and not in good faith, then the Investigating Officer may recommend that the Disciplinary Procedure be invoked.

9. Legal Proceedings

Where a fraud, bribery or corruption is proven, then a likely outcome may be criminal prosecution and/or civil proceedings against the perpetrator(s).

10. If the Case is Groundless

If it is decided that the disclosure was groundless, the Investigating Officer will explain this to the person who made the disclosure.

11. Performance Achievement Scrutiny Group

A summary of the findings of all investigations under this process will be reported to the Group.

12. Communicating the Outcome

The aim of this Policy is to assure employees that their concerns are properly addressed. The Authorised Officer will inform the person who made the disclosure of the outcome of the investigation, any action taken and their right of appeal.

In addition, actions arising from a Whistleblowing investigation will be made available to all staff in order to further promote and build trust and confidence in the process. Such information will not identify the person who made the disclosure, or the employee concerned.

13. Learn from Past Experience

Where a fraud has occurred, then arising from the investigation process and an Audit report to Members, there will be an action plan to ensure that the Authority learns from experiences of fraud, bribery and corruption.

Support During and After an Investigation

14. Support

Where necessary and appropriate, the Service will provide support, counselling or mediation to any person affected by an investigation in order to ensure normal working relationships are resumed as effectively as possible.

Appeal

15. Appeal

If the person who made the disclosure is dissatisfied with investigations outcome they may request that the Authorised Officer review the findings. This request must be in writing within ten days of the notification of the findings being published. The Authorised Officer will consider the request and respond in writing within ten days, setting out whether or not sufficient grounds exist for the disclosure to be investigated further.

If the appeal is allowed a second investigation, by a different Investigating Officer, will take place in accordance with paragraph 7, the results of which will be final.

4 **People Impact Assessment**

No additional requirements were identified.

5 **Review**

- 5.1 This Service Order will be subject to review at 3 yearly intervals or following significant change to organisational structure, personnel, procedures or legislation etc.



Bedfordshire
Fire & Rescue Service

Service Information System Policies and Procedures

Document Ref No: V01 05

Version: 1

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Reviewer: Lauren Fair, Business Support Manager

Issue date: 22.03.2023

Review date: 22.03.2026

Approved by: HSSA