

## **METRO'S ANTI-FRAUD & ANTI-CORRUPTION POLICY/STRATEGY**

### **1. POLICY STATEMENT**

Metro is firmly resolved to protect itself against the perpetration of fraud and corruption from both internal and external sources, through

- high standards of propriety and accountability together with an expectation that all staff will strictly adhere to regulations, procedures and practices and at all times in the best interests of Metro.
- ensuring that all individuals and organisations who conduct business with Metro do so with integrity and without intent to act fraudulently or corruptly in any way.
- ensuring that all staff act lawfully and in an ethical manner, as expected of employees of a public organisation, at all times.
- commitment to an effective Anti-Fraud and Anti-Corruption strategy to encourage and communicate prevention, to promote detection and identify a clear course of action for investigation and remedial action.
- the promotion of an anti-fraud culture with strong commitment to openness and fairness in all matters of business in pursuance of corporate aims and objectives.
- the exchange of information and co-operation with external bodies on all matters pertaining to combating fraud and corruption practices.

Metro will **in all cases** request the police to undertake a criminal enquiry where the results of an audit investigation provide evidence of fraudulent activity.

### **2. STRATEGY STATEMENT**

**2.1** Metro will deliver the policy statement by maintaining and enhancing, as appropriate, an Anti-Fraud and Corruption framework. The key components of the framework are set out below.

#### **2.2 Standing Orders and Financial Regulations (SOFR)**

Both the PTA and PTE have Standing Orders and Financial Regulations which are pivotal to the control framework as they prescribe the rules and measures by which Metro seeks to protect both itself and its employees in conducting day to day business. Non-compliance with SOFRs is a disciplinary matter and will always be treated in accordance with the disciplinary procedure.

### **2.3 Departmental Procedures**

These procedures establish the responsibilities and rules to be followed in individual departments to ensure that the department is effective in achieving its objectives in an efficient and economic manner, and in accordance with best practice. They seek to maintain continuity of control irrespective of changes in personnel.

### **2.4 Code of Conduct**

#### **Employees**

A Code of Conduct prescribes general guidelines and ethical standards which all employees are expected to adhere to at all times both during and outside working hours.

#### **Members**

The Code of Conduct for Members gives guidance on ethical standards, disclosure of personal and prejudicial interests and registration of financial and other interests.

The Codes of Conduct and SOFR set out guidance and instruction to employees and Members on the giving and receiving of hospitality, gifts and favours.

### **2.5 Theft**

All suspected thefts should be notified to a line manager. Any theft accompanied by the distortion of records is defined and treated as fraud and therefore employees are expected to follow the Fraud and Corruption Response Plan – see 2.6 below.

### **2.6 Fraud and Corruption**

Metro has a Fraud and Corruption Response Plan. Concerns should be raised, in the first instance, directly with the manager or supervisor. However, if this is not appropriate then any of the following should be approached:

- Director General;
- Director, Corporate Services;
- Director, Passenger Services;
- Secretary and Solicitor;
- Assistant Director, Finance;
- Assistant Director, Corporate Development;
- The Internal Audit Manager.
- The Monitoring Officer (PTA matters)

The stages of the Fraud and Corruption Response Plan are broadly as follows:-

- Reporting (concerns & allegations).
- Decision to proceed
- Preliminary investigation including gathering evidence, interviewing, recording and reporting.
- Further investigation including gathering evidence, obtaining statements, observing and searching, recording and reporting.
- Referral to the police including decision to refer, liaison and assisting inquiries, decision to prosecute and management action. This includes reporting, disciplinary action, recovery of losses (insured and uninsured) and any remedial action.

## **2.7 Whistleblowing Policy and Procedure**

The Policy and Procedure takes into account the Public Interest Disclosure Act 1998 which aims to protect all employees from victimisation and dismissal where they raise genuine concerns about malpractice, misconduct, non-compliance with policies and procedures etc. The Procedure provides guidance on how to raise concerns and seeks to ensure that such concerns are raised internally. A list of contacts is provided for employees who still wish to raise their concerns with external regulators.

## **2.8 Recruitment Procedure**

Metro has a formal recruitment procedure, which contains appropriate safeguards on matters such as written references and verifying qualifications held. As with other public bodies, police checks are undertaken on employees working with children. Further checks will be introduced in areas where an increased risk of potential fraud and corruption has been identified.

## **3 COMMITMENT**

This Policy/Strategy has been approved by the Executive Board. All Directors are fully supportive of this policy and are committed to ensuring that all staff within their respective functions conduct themselves at all times in accordance with the guidance provided.