

Version Control

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Author	TS
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Action Surrey Fraud Reporting Process

Action Surrey has a confidential fraud reporting policy designed to encourage residents, employees or installers to raise concerns about possible wrong-doings. If any party has fraud related concerns, they can be addressed by following the fraud reporting process outlined below. This documents the procedure undertaken from the point of reporting to the implementation of the required action.

The process is split up into 5 stages:

- 1) *Fraud Reporting form*
- 2) *Fraud Investigation Process*
- 3) *Escalation*
- 4) *Corrective action plan (if required)*
- 5) *Fraud Prevention Plan*

These should be followed chronologically and should aim to be completed within 28 days.

1.1 Fraud Reporting Form

The first stage of the process is the submission of a fraud reporting form. The form allows the reporter to convey the reasons for which they believe that Fraud has been committed along with details of the reporter and potential perpetrator. Any evidence to support the reporter's claim can be submitted along with this form.

The form can be found on the complaints page of the Action Surrey Website and can be downloaded or printed out for completion. For residents who cannot access the website, a form can be posted by one of the members of Action Surrey staff. Residents can call to request this.

1.2 Report Recipient

The recipient of the reporting form will vary depending on the role of the stakeholder that the claim is submitted against. The relevant recipient is outlined below and also visible in the Action Surrey Fraud Reporting Process flowchart.

1. Residents/Applicants – report submitted directly to Action Surrey
2. Installers/Surveyors – report submitted directly to Action Surrey
3. Action Surrey direct project staff – Submitted to ThamesWey’s Risk & Insurance Officer (compliance@thamesweygroup.co.uk) or appropriate member of compliance team.

Physical copies of forms relating to residents, applicants, installers or surveyors can be submitted directly to Action Surrey via email or post.

If the form is reporting an Action Surrey direct project staff, the form should instead be sent to the ThamesWey compliance team. Any such reports inadvertently sent to the Action Surrey team must be passed on to compliance immediately, for action.

2.1 Fraud Investigation Process

Once a fraud reporting form has been submitted, the project manager must begin the Investigation process. This process aims to document all the evidence provided and identify if any additional documents are required. The project manager must acknowledge the report within 5 working days and aim to complete the investigation within 2 weeks.

Should any additional documents be required, the assessor must request these.

If a conclusion cannot be made by the assessor, the report will be escalated via the escalation process outlined below. This process should aim to be completed within 28 days of the original report submission. This may take longer if sufficient documentation takes a considerable amount of time to be acquired.

2.2 Required Evidence

The evidence required may vary on a case by case basis. The assessor must judge whether they consider the evidence provided is sufficient enough to suggest fraud has occurred and the stakeholder should be reported to the relevant authorities.

If the assessor is unsure of what evidence is required they should consult with ThamesWey finance department initially (if the fraud is related to income, benefit, tax etc.). If still unsure, the report can be escalated.

3.1 Escalation

There are three levels of escalation:

1st = Escalation to Energy Efficiency Projects Manager

2nd = Escalation to Head of Energy & Environment

3rd = Escalation to Chief Operating Officer

Level 1 escalation is required for every report submission. This ensures every fraud investigation is examined by multiple members of staff and adds a level of quality assurance. If at this stage, a conclusion is reached, further escalation is not required. Instead the report can be moved to the next section of the investigation: relevant action.

Should a conclusion not be made, level 2 escalation is required. The same procedure applies.

The final escalation is to the COO of ThamesWey Sustainable Communities Ltd. This is where the final verdict will be made on whether fraud is believed to have been committed.

4.1 Corrective action plan

The corrective action may vary depending on the context of the investigation. The list below outlines the authorities that should be informed if an offence has been committed (depending on the context of the offence):

- 1) DESNZ – Report all fraud to DESNZ
- 2) Action Fraud (National level reporting of Fraud – main hub for reporting):
Website: <https://www.actionfraud.police.uk/>
Number: 0300 123 2040
- 3) Benefit Fraud Reporting <https://www.gov.uk/report-benefit-fraud>
- 4) Tax Fraud or Avoidance: <https://www.gov.uk/report-tax-fraud>
- 5) Immigration Fraud <https://www.gov.uk/report-immigration-crime>

All fraud relating to government grant schemes should be reported to DESNZ and Action Fraud. In addition to relevant reporting, the following actions will be taken as appropriate:

4.2 Fraud committed by a Resident/Applicant

Should the investigation conclude that fraud was committed by a Resident or Applicant, their application will be terminated immediately.

4.3 Fraud committed by an Installer/Surveyor

Should the investigation conclude that fraud was committed by an installer or surveyor, their partnership with ThamesWey will be dissolved. Subject to the nature of the incident, further investigation may be required to determine if other similar instances of fraud exist.

4.4 Fraud by an Action Surrey employee or project staff

Should the investigation conclude that fraud was committed by Action Surrey project staff, ThamesWey will commence formal disciplinary proceedings in line with the relevant internal policy.

4.5 Formal reply to reporter

The assessor must now construct a formal reply to the original reporter that outlines the action taken to investigate the claim and the outcome from the investigation.

5.1 Fraud Prevention Plan

Once the relevant action has been taken and initial reporter replied to, the fraud prevention plan document must be completed. This purpose of this document is to analyse why and how fraud occurred and what can be done to stop similar cases happening again.

It outlines where potential mistakes were made and can be used to help reduce future fraud risk.

5.2 Examples of fraud risk

Examples of potential fraud risks may include:

- A provider using the funding for purposes outside of the grant conditions
- Work not carried out, funds diverted, ineligibility not declared
- False application or payment of grants to any person, agency or organisation
- Spurious claims based on fiction e.g. claims made for empty properties and funding pocketed or upgrades sold on

If any of these types of fraud occur, potential preventative measures are suggested in the Fraud Scenarios document. The preventative measures in the prevention plan should be specific to the offence committed. The fraud scenarios document simply suggests potential actions that could be taken.