

**Prisons &
Probation**

Ombudsman
Independent Investigations

Counter Fraud Functional Standard Annual Action Plan 2024/25

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OUR VISION

To deliver high quality and timely independent investigations and work closely with partners to achieve tangible benefits for the safety and confidence of those in custody and under community supervision.

WHAT WE DO



WHAT WE VALUE



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Outline

The Counter Fraud Functional Standard is a Government initiative to set the expectations for the management of fraud risk in central Government organisations.

Roles and Responsibilities

The counter fraud standard requires three roles to be filled. At the Prisons and Probation Ombudsman (PPO), these roles are filled by:

- Board level representative – Adrian Usher
- Fraud Champion – Kimberley Bingham
- Senior lead with day-to-day responsibility – Peter Dixon

Requirements

The functional standard requires all organisations to have the following in place:

- An accountable individual at board level.
- A counter fraud, bribery and corruption strategy.
- A counter fraud, bribery and corruption risk assessment.
- A policy and response plan for dealing with potential instances.
- An annual action plan.
- Outcome based metrics.
- Established reporting routes for staff, contractors and members of the public.
- Reporting identified loss.
- Access to trained investigators.
- Undertake activity to try and detect fraud.
- Access to fraud awareness, bribery and corruption training for staff.
- Policies and registers for gifts, hospitality and conflicts of interest.

Update on Requirements

The items below list the actions taken by the PPO to meet the requirements from the functional standard during the 2023/24 financial year. This action plan contains the progress made in the past 12 months along with what actions are required over the coming year.

An Accountable Individual at Board Level

Adrian Usher, the Prisons and Probation Ombudsman, and Kimberley Bingham, Deputy Ombudsman for Learning, Analysis and Business Services, are both part of the PPO's Executive Committee (the PPO's equivalent to board level) and in the PPO's Senior Leadership Team (the level below board level), so they can act as the accountable individuals at board level. Peter Dixon, the Head of Business Services, also sits on the Senior Leadership Team and can provide updates as required.

A Counter Fraud, Bribery and Corruption Strategy

The PPO has continued to use the Ministry of Justice's (MoJ) Fraud Policy and Response Plan.

The PPO's Executive Committee will discuss fraud, bribery and corruption risks, both estimated and actual, on an annual basis.

A Counter Fraud, Bribery and Corruption Risk Assessment

The PPO created a new Fraud Risk Assessment in February 2024 to identify the various fraud risks faced by the PPO and to assess the controls that are needed to prevent and detect these potential fraud risks. The risks will be reviewed on a quarterly basis and any newly identified risks will be immediately added to the Fraud Risk Assessment.

Additionally, the Strategic Risk Register contains the main fraud risk that the PPO has identified.

A Policy and Response Plan for Dealing with Potential Instances

In line with the MoJ's Fraud Policy and Response Plan, if we identify any potential instances of fraud, we will initially report them to the MoJ's counter fraud team for advice and investigation.

An Annual Action Plan

The PPO has introduced a Counter Fraud Action Plan.

Outcome Based Metrics

The PPO believes that the best way to prevent fraud is to ensure that our staff take their counter fraud responsibilities seriously and that they are educated about fraud, bribery and corruption. To enable this, Counter Fraud, Bribery and Corruption training is a mandatory e-learning course for all PPO staff on Civil Service Learning. All new staff must complete this training as part of their induction within one month of their start date.

In light of this, the PPO will implement the metric that 100% of all staff must complete the Counter Fraud, Bribery and Corruption training on an annual basis.

Established Reporting Routes for Staff, Contractors and Members of the Public

The MoJ's Fraud Policy and Response Plan contains details of the various reporting routes for known or potential instances of fraud, bribery or corruption. For our staff, contractors or members of the public, the most appropriate report route would be to email MOJcounterfraud@justice.gov.uk.

In line with previous versions of the PPO's Counter Fraud Annual Action Plan, we will publish this version on our website. This will allow anyone to access the email address for reporting potential fraud.

Reporting Identified Loss

The PPO will follow the MoJ's Fraud Policy and Response Plan in relation to reporting identified losses.

Access to Trained Investigators

If required, the PPO would be able to access trained investigators, qualified to Accredited Counter Fraud Specialist level or equivalent, through the MoJ's Counter Fraud team.

Undertake Activity to Try and Detect Fraud

The PPO's Fraud Risk Assessment contains the various controls that have been introduced to detect or prevent fraud.

Access to Fraud Awareness, Bribery and Corruption Training for Staff

As stated above, all PPO staff must complete the Counter Fraud, Bribery and Corruption e-learning course through Civil Service Learning. This training provides an overview of the crimes of fraud, bribery and corruption and outlines the duties that we have in protecting the Civil Service against them.

Policies and Registers for Gifts, Hospitality and Conflicts of Interest

The PPO follows the MoJ's Gifts and Hospitality Policy and its Declaration and Management of Outside Interests Policy which refers to conflicts of interest.

The PPO has a Gifts and Hospitality Register but nothing has been listed. While the PPO expects our staff to have been offered few gifts, and none of significant value, further action is needed to educate our staff about the need to report and authorise any gifts or hospitality.

Furthermore, in line with the MoJ's Gifts and Hospitality Policy, any future offers of gifts or hospitality should be recorded on the MoJ's Gifts and Hospitality portal ([Record Gifts and Hospitality](#)).

The PPO created a new Conflict of Interest Register in February 2024 to identify, record and assess any potential conflicts of interest experienced by PPO staff. While this register has been created, further action is needed to educate our staff about the need to identify and report any potential conflicts of interest.

In line with the MoJ's Declaration and Management of Outside Interests Policy, any staff facing a potential conflict of interest should complete the MoJ's Declaration of Interests form. Once completed, the form must be authorised by the person's line manager and sent to the MoJ's Transparency Unit.

Reporting

When requested, the PPO will submit returns, including nil returns, for the following:

- CDR (Consolidated Data Request) Commission – requesting information about any fraud detections, records, preventions and losses, or any errors.
- Conflict of Interest Register.
- Gifts and Hospitality Register.

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