

# Anti-fraud, Bribery and Corruption Policy

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<b>Policy Author</b>	Counter Fraud Manager
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## 1. INTRODUCTION

- 1.1 This policy provides a clear framework alongside the council's Fraud Response Plan, for the council to undertake necessary, legal and proportionate actions wherever the evidence supports an investigation into an allegation of fraud, and to seek recovery of defrauded monies through all possible legal means.
- 1.2 The council maintains high standards of probity and has a good reputation with the residents which it serves, for protecting public finances. Sound systems of public accountability are vital to effective management and in maintaining public confidence. The minimisation of losses to fraud and corruption is essential for ensuring that public resources are used for their intended purpose of providing services to its residents.
- 1.3 The council takes its responsibilities to protect the public purse very seriously and is committed to the highest ethical standards, to ensure the proper use and protection of public funds and assets. The public rightfully expects the council to conduct its business with integrity, honesty, transparency and demand the highest standards of conduct from those working for it, aligned to the seven Nolan Principles for Standards in Public Life.
- 1.4 The council will not tolerate fraud or corruption and will take all necessary steps to investigate all allegations recognising that the impacts can:
  - Undermine the standards of public service that the council is attempting to achieve.
  - Reduce the level of resources and services available for our residents.
  - Result in major consequences which reduce public confidence in the council.
- 1.5 Appropriate sanctions and redress will be pursued against anyone perpetrating or attempting to commit fraud, and every effort will be made to recover any losses incurred by the council.

## 2. AIMS AND OBJECTIVES

- 2.1 The aims and objectives of this policy are to:
  - Protect the council's valuable resources by ensuring they are not lost through fraud but are used to provide quality services to Herefordshire residents and visitors.
  - Promote a robust anti-fraud culture which highlights the council's zero tolerance of fraud, theft, bribery, tax evasion and corruption.

Have in place a Counter Fraud Service which:

- Proactively and strategically investigates allegations of corporate fraud.
- Applies appropriate sanctions and recovers corporate fraud losses.
- Provides recommendations to inform policy, risk and control improvements, thereby reducing the council's exposure to fraudulent activity.
- Creates an environment that encourages the timely reporting of suspicious fraudulent activity, ensuring that the rights of people raising legitimate concerns are properly protected.
- Works with partners and other investigative bodies to strengthen and continuously improve our arrangements for preventing fraud and sharing intelligence.

### 3. SCOPE, ROLES & RESPONSIBILITIES

- 3.1 The council will not tolerate fraud, bribery, corruption or other forms of financial irregularity by anyone. This policy therefore applies to:
- All council employees (including volunteers, temporary staff and agency staff);
  - Elected members;
  - Staff and Committee members of council funded voluntary organisations;
  - Council partners;
  - Council suppliers, contractors and consultants (whether engaged directly or indirectly through partnership working);
  - Service users; and
  - Members of the Public.
- 3.2 Section 151 of the Local Government Act (1972) sets out that every local authority in England & Wales should: “make arrangements for the proper administration of their financial affairs and shall secure that one of their officers has the responsibility for the administration of those affairs”. This role is designated to the council’s Section 151 Officer.
- 3.3 Section 114 of the Local Government Finance Act (LGFA) 1988 requires the Chief Financial Officer (to report to the Council if the authority, one of its committees, the Leader and Cabinet Executive or one of its officers:
- Has made – or is about to make – a decision which has or would result in unlawful expenditure;
  - Has taken, or is about to take, an unlawful action which has or would result in a loss or deficit to the authority; or
  - Is about to make an unlawful entry in the council’s accounts.
- 3.4 It is important that everyone within the council, or associated with the local authority, understands what their specific responsibilities are in relation to fraud prevention and reporting requirements. These roles and broad responsibilities are outlined in the following table;

<b>Stakeholder</b>	<b>Specific Responsibilities</b>
<b>Audit and Governance Committee</b>	To monitor the effectiveness and approve relevant counter fraud policies such as the Whistleblowing Policy and the Anti-fraud, Bribery and Corruption Policy. The committee also oversees progress detailed within the annual fraud report.
<b>Chief Executive</b>	The Chief Executive is ultimately accountable for the effectiveness of the council's appetite and arrangements for countering fraud and corruption.
<b>Finance Portfolio Holder</b>	The Finance Portfolio Holder is the cabinet member responsible for Finance and Corporate services and has the responsibility of the council's Counter Fraud Strategic framework.
<b>Councillors</b>	To promote and support the council's stance on fraud, corruption and bribery. To promote and uphold the Nolan Principles.
<b>Chief Financial Officer/ (Section 151 Officer)</b>	Has the statutory obligation under section 151 of the Local Government Act 1972 to ensure the protection of public funds and to have an effective system of prevention and detection of fraud and corruption. To oversee that the council has effective arrangements to meet these obligations and that there is an effective audit service to provide an objective view on the council's counter fraud maturity.
<b>Monitoring Officer</b>	To help ensure that the council does not act unlawfully and to monitor the whistleblowing function. The Monitoring Officer undertakes an initial assessment on any referrals made through this reporting method, to determine the type of allegation.
<b>Counter Fraud Service (CFS)</b>	To raise fraud awareness internally within the council and externally to the public. To train and educate employees about fraud and create / implement an effective strategic response. To work with services to assess the risk of fraud across the organisation. To act as the authorised point of contact for corporate fraud investigations. To function effectively with all stakeholders in the counter fraud process.
<b>Internal Audit</b>	To provide advice and assurance to the council on the effectiveness of internal controls which are designed to reduce the risk of fraud, corruption, bribery and theft. To undertake risk assessments across the organisation and work with the council's internal Counter Fraud Service to help mitigate fraud risk.
<b>External Audit</b>	Providing an independent assessment of the organization's arrangements for preventing and detecting fraud. Reporting on whether the organization has adequate arrangements in place.

<b>Stakeholder</b>	<b>Specific Responsibilities</b>
<b>Economy and Environment [SOD]</b>	The Economy and Environment Scheme of Delegation (SOD) gives authority to the Counter Fraud Service to act as necessary, in accordance with counter fraud officers' legislative remit.
<b>Trading Standards</b>	To support the Counter Fraud Service by sharing intelligence and resources, where applicable.
<b>Parking Enforcement Services</b>	To proactively review correct use of disability parking permits and where necessary, take appropriate actions when identifying blue badge misuse and fraud.
<b>Information Security (Cyber)</b>	To promote safe online behaviour and to train staff to recognise and respond appropriately to cyber threats. To Integrate and monitor the effectiveness of controls in the prevention and detection of cyber fraud.
<b>Human Resources</b>	To function effectively with the Counter Fraud Service by working together in relation to any internal fraud, corruption, theft or bribery investigations.
<b>Heads of Service and Service Managers</b>	To assist in promoting staff awareness and ensuring that all suspected irregularities are immediately referred following the council's Counter Fraud Policy and Fraud Response Plan. Responsible for ensuring strong internal controls and risk assessments are embedded within departments to prevent and detect fraud.
<b>Staff</b>	To comply with the council's counter fraud policies and procedures, to be aware of the possibility of fraud, corruption, bribery and theft, and to report any genuine concerns through appropriate channels.
<b>Partners, Suppliers, Contractors and Consultants</b>	To be aware of the possibility of fraud, theft, bribery and corruption against the council and report any genuine concerns or suspicions through appropriate channels.

## 4. DEFINITIONS

### 4.1 Fraud

Put simply, fraud is an act of deliberate deception intended for personal gain or to cause a loss to another party.

The Fraud Act 2006 identifies fraud as a criminal offence which can be committed in a number of separate ways, such as but not limited to the following categories:

- False representation
- Failure to disclose information where there is a legal duty to do so
- Abuse of position

### 4.2 Theft

When someone dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it.

The Theft Act 1968 defines “a person is guilty of theft if he dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it”.

### 4.3 Bribery

Giving, receiving or promising someone a financial or other advantage, to encourage that person to perform their functions or activities improperly, or to reward that person for having already done so.

The key offences under the Bribery Act 2010 are:

- Active bribery: promising or giving a financial or other advantage; Passive bribery: agreeing to receive or accepting a financial or other advantage;
- Bribing of foreign public officials;
- The failure of commercial organisations to prevent bribery by an associated person (corporate offence).

### 4.4 Corruption

Unlawful behaviour through the abuse of entrusted power or position of authority, for personal gain or other advantage.

The Bribery Act 2010 makes it possible for individuals to be convicted where they are deemed to have given their consent or approval in giving or receiving a bribe.

### 4.5 Deception

An act or statement which misleads, hides the truth, or promotes a belief, concept, idea or identity that is not true. It is often done for personal gain or other advantage.

#### 4.6 Tax Evasion

The non-payment or under-payment of taxes, usually resulting from making a false declaration or no declaration at all of taxes due to the relevant tax authorities, resulting in legal penalties (which may be civil or criminal) if the perpetrator of tax evasion is caught.

#### 4.7 Tax Avoidance

Seeking to minimise a tax bill without deliberate deception (which would be tax evasion) but contrary to the spirit of the law. It therefore involves the exploitation of loopholes and gaps in the tax and other legislation in ways not anticipated by the law.

#### 4.8 Relevant Body

A 'relevant body' means only incorporated bodies (which includes the council) and partnerships, not individuals.

## 5. FRAUD INDICATORS

- 5.1 Fraud incidents can come to light in multiple ways but can also be due to suspicions aroused by, for example, the behaviour of certain individuals. It is impossible to give a definitive list of fraud indications or warning signs. However, the following are indicators that may, cumulatively / repeatedly with other factors, suggest the possibility of fraud and may therefore require reporting.

- Unusual employee behaviour
- Financial Irregularities
- Poor procurement practice
- Control inadequacies
- Inadequate supervision
- Lax corporate culture
- Poor work practices

## 6. TYPES OF FRAUD

- 6.1 Local authorities have reported a wide range of fraud types and some of these are more prevalent in particular areas of the country or as a result of specific services offered by an authority, therefore the use of risk assessments and employee training, are used across the organisation to help identify service specific types of fraud. A broad example (not an exhaustive list) of the types of fraud faced by public sectors is displayed in the table below.



<b>Adult Social Care</b>	Misuse of direct payments/ budgets intended for the care of vulnerable individuals. Social care workers claiming hours for care not provided.
<b>Blue Badge</b>	Use of counterfeit or altered badges. Use when a disabled person is not present or is deceased. Badges issued to institutions, being misused by employees.
<b>Business Rates</b>	Fraudulent applications for false occupation, exemptions and reliefs, unlisted properties, rating agent and third-party refund fraud
<b>Council Tax</b>	Discounts and exemptions, council tax support.
<b>Cyber Crime</b>	Enables a diverse and wide range of fraud.
<b>Disabled Facility Grants</b>	Fraudulent applications for adaptations to homes aimed at the disabled.
<b>Grants</b>	Fraudulent occupation or representation of a premises to obtain a grant. Work not carried out, funds diverted, ineligibility not declared.
<b>Identity Fraud</b>	False Identity, fictitious persons applying for services or payments.
<b>Insurance</b>	False or exaggerated claims, including slips and trips.
<b>Internal Fraud</b>	Diverting council monies to a personal account. Accepting bribes, stealing cash, misallocating social housing for personal gain, working elsewhere while claiming to be off sick, false overtime claims, selling council property for personal gain, wrongfully claiming benefit whilst working. Undeclared employment (polygamous working).
<b>Enterprise Partnerships</b>	Voluntary partnerships between local authorities and businesses, procurement and grant fraud.
<b>Money Laundering</b>	Exposure to subject transactions.
<b>Payroll</b>	False employees, overtime claims, expenses.
<b>Personal Budgets</b>	Overstatement of needs through false declaration, multiple claims across authorities.
<b>Pensions</b>	Deceased pension claims, overpayments, entitlements being overstated.
<b>Public Funds</b>	Fraudulent claims of eligibility across a variety of sectors.
<b>Procurement</b>	Tendering issues, split contracts, double invoicing.
<b>Schools</b>	Procurement fraud in schools, payroll fraud, internal fraud.
<b>Travel schemes</b>	Use of concession of by ineligible person.

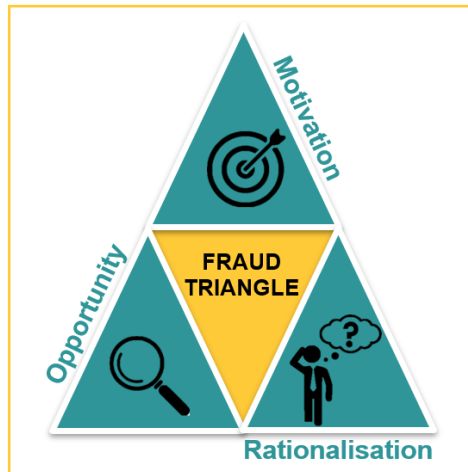
## 7. COUNTER FRAUD STRATEGY

- 7.1 It is essential that the council tackles the risk of fraud using a strategic approach. Therefore, the council has integrated six core strategic pillars, which accompanies this policy and the Fraud Response Plan. These pillars are aligned to nationally recognised standards and underpin the council's strategic approach to support the management of fraud risk and counter fraud activity.
- 7.2 The six pillars that form the council's strategic response to countering the risk of fraud are listed below and conform of the following.
- Deterrence
  - Governance
  - Acknowledgment
  - Prevention
  - Pursuit
  - Protection



## 8. ANTI-FRAUD CULTURE

- 8.1 It is first important to understand the psychology of why an opportunistic fraudster may choose to commit fraud. This can be best explained by the 'Fraud Triangle' theory outlined below.



**Motivation** – The first step in the theory is motivation and it is sometimes also referred to as 'Pressure'. A person who commits fraud may be pressured to or needs to be willing to commit fraud. This can be separated into the following:

- 'Fraud for need' - It might be due to a financial need such as living beyond their means, debts, or to feed an addiction.
- 'Fraud for greed' – committing fraud simply as a desire for more status, or a desire for material goods. The sense of 'beating the system' may also act as a further motivator.

**Rationalisation** - A fraudster will often justify to themselves why they have committed fraud. They may see their act as revenge for inadequate pay or excessive workload. They may convince themselves that they will pay the money back one day; or that the organisation is so big it won't miss the small amount taken.

**Opportunity** - The fraudster will usually look for opportunities to commit fraud. They may have heard stories from others who have cheated an organisation in a certain way before and may seek to copy this. Detailed knowledge of internal systems may make it easier for fraud to occur, particularly if the fraudster is aware of its weaknesses or has excessive control responsibility. Weak internal controls make it easier for fraud to be successful and reduce the likelihood of it being identified.

- 8.2 The council's members, employees, partners, and volunteers play an important role in creating and maintaining this culture. They are positively encouraged to raise concerns regarding fraud, theft, bribery and corruption, regardless of seniority, rank or status, confident in the knowledge that such concerns will be investigated and wherever possible be treated with confidentiality. Suppliers/ contractors to the council and the public also have roles to play in this process and should inform the council if they feel that fraud, theft, bribery or corruption may have occurred.

- 8.3 The prevention and detection of fraud, theft, bribery or corruption and the protection of the public purse are responsibilities of everyone, both internal and external to the organisation.
- 8.4 Through the use of fraud awareness training, regular communication, comprehensive assessments and ongoing support from all responsible parties, the council will continue to have robust processes in place to help embed arrangements across council services.

## 9. TRAINING AND AWARENESS

- 9.1 The council recognises that the continuing success of this policy and other supporting policies and its general credibility will depend in part on the effectiveness of training and awareness for employees, members and affected external parties. The council undertakes the following actions to fulfil the principles of this policy:
- New starters receive an induction programme which includes training on relevant policies covering declarations of interest, and a mandatory training module on counter fraud, bribery and corruption.
  - Training courses developed and maintained by the Counter Fraud Service (CFS), are available for all staff on fraud, theft, bribery, corruption and money laundering. Further cyber security training is provided by the Information Security team.
  - The CFS also provides specific training to services areas when the need arises.
  - Fraud awareness is raised through corporate communication channels.
  - Regular fraud alerts are sent to affected service areas to increase staff awareness.
  - Copies of the Anti-Fraud, Bribery and Corruption Policy, the Fraud Response Plan, the Whistleblowing Policy and any other relevant policy are made easily available.

## 10 FRAUD RISK MANAGEMENT

- 10.1 Herefordshire Council's approach to managing fraud risks are consistent with the principles and expectations set out in the council's Risk Management Strategy and Framework. Identified risks are to be reviewed regularly and monitored through established risk governance processes, ensuring that appropriate mitigation and escalation procedures are in place.
- 10.2 It is the responsibility of managers to ensure that any fraud risk is adequately considered when preparing risk assessments in support of achieving strategic priorities, business plans, project and programme objectives and outcomes. The service lead is recognised as the responsible risk owner for fraud within their respective service area.
- 10.3 Any changes in operations or the business environment must also be assessed by the service to ensure any impacts, which might increase or otherwise change the risk of fraud, bribery and corruption, are considered. In making this assessment it is important for the risk owner to consider the risk of fraud occurring, rather than any actual incidences of fraud having occurred in the past. Once the fraud risk has been evaluated, appropriate action should be taken to mitigate those risks on an ongoing basis and to proactively review the risks identified.

## 11. CORPORATE OFFENCES

### 11.1 FAILURE TO PREVENT THE FACILITATION OF TAX EVASION

- 11.2 In 2017, the UK Government made it a corporate criminal offence for businesses and commercial organisations (corporate liability), to fail to put in place reasonable preventative procedures 'RPP's' to stop employees and other associated persons from facilitating tax evasion. The new offences were set out in Part 3 of the Criminal Finances Act (CFA) 2017.
- 11.3 Under the CFA 2017, it is an offence to fail to prevent the facilitation of the evasion of UK or foreign taxes. The intention of the CFA 2017 was to impose criminal liability on organisations whose employees, for example, helped clients evade taxes.
- 11.4 The Government guidance refers to both the 'Relevant body', namely the council, and 'persons acting as associates' (any employee, agent or other person who performs services for, or, on behalf of the council). The associate person can be individual or an incorporated body.
- 11.5 Only a relevant body can commit the new offences. If an associate deliberately and dishonestly facilitates a tax evasion offence whilst performing services for or on behalf of Herefordshire Council, the authority could also be held accountable, unless they could evidence that RPP's have been put in place to prevent its associated persons from committing tax evasion.

### 12 FAILURE TO PREVENT FRAUD

- 12.1 In September 2023, the Economic Crime and Corporate Transparency Act 2023 introduces a new corporate offence of '*failure to prevent fraud*', aimed at strengthening accountability for fraudulent conduct within large organisations.
- 12.2 Under this legislation, a local authority or any large organisation, can be held criminally liable if a fraud offence is committed by an employee, agent, or associated person for the benefit of the organisation, and the authority did not have reasonable fraud prevention procedures (RPP's) in place. Crucially, it is not necessary to prove that senior leadership was aware of or directed the fraudulent activity.
- 12.3 While the offence formally applies only to large organisations, the principles of robust fraud prevention are considered best practice across the public sector. For local authorities, this means ensuring that proportionate and effective anti-fraud controls, training, and reporting mechanisms are embedded throughout the organisation. Doing so not only mitigates legal risk but also reinforces public trust and the responsible stewardship of public funds.

## **13 REASONABLE PREVENTATIVE PROCEDURES**

13.1 Government guidance suggests the RPP measures should be taken based on an assessment that identifies the specific risks of the organisation. The Government has set the same threshold for Tax Evasion and Failure to Prevent Fraud prevention measures, as those set for Bribery (under S7 of the Bribery Act 2010). i.e. When an offence has been committed, an organisation must be able to evidence that they have adequate procedures in place designed to prevent persons associated with the council from undertaking such conduct.

- Risk Assessment
- Proportionality of risk-based prevention procedures
- Top Level Commitment
- Due Diligence
- Communication (including training)
- Monitoring and Review

13.2 The council must ensure that their policies and procedures are up-to-date, and that staff are made aware of their responsibility around the prevention of tax evasion and failure to prevent fraud legislation. This will not only provide a safeguard against these corporate offences but also enable the council to evidence that it is compliant with the expected procedures.

13.3 The council has supporting policies in place that all contribute to staff awareness and Governance. These are detailed under section 19 of this document.

## **14. GOVERNANCE**

14.1 Good corporate governance procedures are a strong safeguard against fraud and corruption. The Audit and Governance Committee is a key member forum for ensuring sufficient weight and support is given to counter fraud, theft, bribery and anti-corruption activity.

14.2 Whilst all stakeholders in scope have a part to play in reducing the risk of fraud, the council's members, directors and management are ideally positioned to influence the tone of the organisation and play a crucial role in fostering a culture of high ethical standards and integrity.

## **15. INVESTIGATION**

15.1 The Fraud Response Plan outlines how the authority will seek to take further action against perpetrators of fraud, theft, bribery and corruption. This can include the council deciding to use its power to prosecute in appropriate cases under Section 222 of the Local Government Act 1972, and /or the use of other available sanctions.

15.2 In cases where there is sufficient evidence of theft, fraud, bribery, tax evasion or corruption against the authority, all individuals or entities will face appropriate action under this policy and in alignment with the Fraud Response Plan procedures.

## 16. REPORTING

- 16.1 The council recognises that responsibility for the prevention and detection of fraud rests with everyone. We also recognise the difficulties that can be associated with reporting concerns, which is why all referrals are treated with complete confidentiality.
- 16.2 Reporting is essential and:
- Ensures the consistent treatment of information regarding fraud, bribery and corruption.
  - Facilitates proper investigation.
  - Ensures the proper implementation of a fraud response investigation plan.
  - Ensures appropriate employment procedures are followed.
  - Ensures the interest of the people of Herefordshire are protected.
- 16.3 The Fraud Response Plan details how any suspected matter of fraud, theft, irregularity, bribery and corruption can be reported, who it is reported to and how the authority responds to these referrals.
- 16.4 If you believe someone is committing fraud, or suspect corrupt practices, these concerns should be raised immediately. Details are outlined in the Fraud Response Plan and on the council's website on how you can report any allegations of fraud.

## 17. DATA MATCHING

- 17.1 The council participates in all mandatory data matching exercises most notably the National Fraud Initiative (NFI). In addition, further internal data matching exercises are undertaken at various times, for example matching council tax single person discount records with Electoral Role data. All exercises adhere to data protection requirements under the Data Protection Act 2018.

## 18. INTELLIGENCE & COLLABORATION

- 18.1 The council continues to work alongside and with other agencies where possible, in the prevention, detection and investigation of fraud. Effective communication and joint working between local authorities and with other agencies, is prioritised as essential in the ongoing development of the council's strategic counter fraud response.
- 18.2 Only through clear and efficient collaboration between relevant channels, can the risk of fraud be managed. The CFS encourages and understands the benefits of networking with other local authorities and law enforcement agencies. By regularly sharing intelligence internally and externally, the organisation is enhancing its ability to prevent and detect instances of fraud.



## 19. SUPPORTING POLICIES AND PROCEDURES

19.1 The following policies, procedures and guidance documents support or are linked to the council's Anti-Fraud, Bribery and Corruption Policy. Please note that some of these documents may only be accessible to internally employed staff, and they can be located by searching [here](#).

- Fraud Response Plan
- Fraud Risk Assessment
- Mandatory Fraud Awareness Training
- Whistleblowing Policy
- Anti-Money Laundering Policy
- Codes of Conduct (employees and councillors)
- Financial Procedure Rules
- Procurement Card Policy
- Compromised Card Procedure
- Contract Procedure Rules
- Debt Recovery Policy
- Direct Payments Policy
- Adult Safeguarding Procedure
- Recruitment Procedure
- Employee Interests, Gifts and Hospitality Policy
- Resourcing and Managing Performance Policy
- Conducting an Investigation Guidance
- Investigations involving use of social media guidance and procedure
- Equality Policy
- Disciplinary Procedures
- Enforcement & Prosecutions Policy
- Information Security Policy

## 20. DATA PROTECTION

20.1 The personal information we collect across the council services will be shared with fraud prevention agencies who will use it to prevent fraud, money-laundering and to verify identities. If fraud is detected, the council retains the right to refuse certain services, finance, or employment. Further details of how your information will be used by the council and these fraud prevention agencies, are publicly available on the council's website using the link below.

<https://www.herefordshire.gov.uk/directory-record/6201/fraud-prevention-privacy-notice>

20.2 Further information about the processing of your data you can contact the council's Data Protection Officer through [informationgovernance@herefordshire.gov.uk](mailto:informationgovernance@herefordshire.gov.uk)