

THE SOCIAL SECURITY FUND OF RWANDA

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FRAUD MANAGEMENT POLICY

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Executive Summary

This policy is intended to provide guidance to management and staff of the SSFR on how to report and deal with the allegations of fraud and corruption. It sets out the SSFR's policy, regulatory background and definitions of fraud and corruption. It also outlines the notification process, investigation procedures and type of outcomes which are likely to be considered.

1.0 Introduction

One of the basic principles of public sector organisations is the proper use of public funds. In recognition of its responsibility for safeguarding public money, the fund and its employees are committed to minimising fraud and corruption within the SSFR. The fund recognises that employees will often be the first to become suspicious of behaviour that may, after investigation turn out to be fraudulent, corrupt or dishonest. Employees therefore have an important role to play in reporting suspected malpractices.

SSFR requires all staff to act honestly and with integrity and to safeguard the public resources for which they are responsible. SSFR will not accept any level of fraud or corruption; consequently any case will be thoroughly investigated and dealt with appropriately. SSFR is committed to ensure that opportunities for fraud and corruption are reduced to the possible level of risk.

The aim of this fraud policy and response plan ('the policy') is to give a clear message about the fund's position, to outline the procedures which should be followed and to provide information for employees. In order to deter fraud and corruption (collectively termed fraud unless otherwise specified), whether it is committed by employees, contractor; or public, the fund must be seen to deal firmly and fairly with all suspected malpractices.

Many employees will not have had first experience of dealing with suspected fraud. This policy has been prepared to assist staff and managers with the actions they should take if such suspicions arise.

2.0 What is Fraud?

No Precise legal definition of fraud exists; many of offences referred to as fraud are covered by the Rwandan Penal code of 18th August 1977 as modified to date. The term is used to describe such acts of deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation and concealment of material fact and collusion.

“Fraud” is usually used to describe depriving someone of something by, which might either be straight theft, misuse of fund or other resources, or more complicated crimes like false accounting and the supply of false information. In legal terms, all these activities are crimes of the same category.

“Corruption – the offering, giving, soliciting or acceptance of an inducement or a reward which may influence a person to act against the interest of the organisation.”

3.0 Policy Statement

This policy deals with preventive, investigative and recovery aspects of fraud and corruption. Its

Objective is to ensure that all risks associated with fraud and corruption are controlled and suspicion of dishonesty are detected.

Thus, all instances of fraud or corruption must be investigated quickly and efficiently so that losses must be minimized, recovery where appropriate can be maximized and future occurrences prevented.

The investigation is also critical in order to clear the names of people and organizations that have been wrongly suspected of dishonesty.

In whatever form it occurs, fraud is corrosive. It undermines an organization's confidence. Fraud frequently devastates reputation and affects staff especially those of innocent employees who are responsible for the area in which fraud practice takes place. For this reason, fraud practices should be prevented or, where this is not possible, quickly detected, and then efficiently investigated and recoveries made.

All employees are therefore reminded of their responsibility to protect the assets of SSFR. Assets include information, as well as property. Staff are also reminded of the three fundamental public service values underpinning all public sector work, which are:

- a) Accountability: Everything done by those who work in a public sector organisation must be able to stand the test of parliamentary scrutiny.
- b) Probity: Absolute honesty and integrity should be exercised in dealing with, Client/service users, assets, staff and the public.
- c) Openness: The organization's activities should be sufficiently public and transparent to promote confidence between the organisation and the clients/service users, staff and the public.

SSFR's policy regarding the (a), (b) and (c) above, is totally committed to maintaining an honest, open and well-intentioned atmosphere within SSFR, so as best fulfill its objective. It is also totally committed to:

- Supporting employees and others wrongly accused of impropriety
- Protecting employees and others who report suspected dishonesty, in good faith, and comply with this policy
- The prevention and detection of fraud and corruption within SSFR
- The rigorous investigation of any such cases whilst ensuring that suspected offenders are dealt with fairly and consistently
- Ensuring that investigations are not suppressed due to potential or likelihood of adverse publicity-such action could comprise SSFR and /or its staff and render them liable and other prosecutions.
- Ensuring that, where fraud, corruption or other criminal act is proven, wrongdoers are appropriately dealt with under its Disciplinary Policy/procedure and as appropriate to prosecution under the law
- Not being passive where it has suspicion of other people or organizations being defrauded. It will report such suspicions and will provide every assistance possible to the victim

- Providing full assistance to law enforcement agencies and other regulatory authorities in their fight against crime

Confidentiality

All information covered in this policy must be handled in a confidential manner. Employees and others to which this policy apply are prohibited from discussing any of the sensitive matters outside of the Social Security Fund of Rwanda (SSFR)

4.0 The Board's Policy

The Board is committed to maintain an honest, open and well intentioned atmosphere with in the fund. It is therefore, also committed to the elimination of any fraud, to rigorous investigation of any such cases, and to ensure that wrongdoers are appropriately dealt with where fraud has been committed.

The Board wishes to encourage any one having reasonable suspicion of fraud to report it. It is also a policy that no employee will be penalised in any way for reporting any reasonably held suspicions. Reasonably held suspicion does not include those which are raised maliciously without substance or relation to SSFR duties.

5.0 Avenues for Reporting Fraud

SSFR has in place avenues for reporting suspicion of fraud. Staff should report such suspicion to the appropriate manager (see Appendix A) or other trusted person. All matters will be dealt with confidentially and strictly in accordance with the terms of law on prevention and repression of corruption; 2001. This statute protects the legitimate personal interest of staff. Vigorous and prompt investigations will be carried out into all cases of actual or suspected fraud discovered or reported.

6.0 Responsibilities

a) The Chief Executive Officer (CEO) is responsible for establishing and maintaining a sound system of internal control that supports the achievement of organisation's policies, aims and objectives. The system of internal control is designed to respond and to manage the whole range

of risk that the organisation faces. The system of internal control is based on an on-going process designed to identify the principle risks, to evaluate the nature and extent of those risks and to manage them effectively.

Managing fraud risks will be seen in the context of the management of this wider range of risks.

b) Overall responsibility for managing risks of fraud sits with the Board of Directors but the day to day responsibility has been delegated to the Chief Executive Officer (see appendix A). Their responsibilities include:

- Developing a fraud risk profile and undertaking a regular review of the fraud risks associated with each of the key organizational objectives in order to keep the profile current.
- Establishing an effective anti-fraud policy and fraud response plan, commensurate to the level of fraud risk identified in the fraud risk profile;
- Designing an effective control environment to prevent fraud commensurate with the fraud risk profile;
- Establishing appropriate Mechanisms for:
 - o Reporting fraud risk issues;
 - o Reporting significant incidents of fraud to the internal auditors;
 - o Coordinating assurances about the effectiveness of anti-fraud policies to support the statement of internal control.
- Liaising with the Risk Audit Committee.
- Making sure that all staff are aware of the organization's fraud policy and know what their responsibilities are in relation to combating fraud;
- Ensuring that appropriate anti-fraud training is available to appropriate staff;
- Ensuring that vigorous and prompt investigations are carried out if fraud occurs or is suspected;
- Taking appropriate legal and/or disciplinary action against perpetrators of fraud;
- Taking appropriate disciplinary action against supervisors where supervisory failure have contributed to the commission of fraud

- Taking appropriate disciplinary action against staff who fail to report fraud;
- Taking appropriate action to recover assets;
- Ensuring that appropriate action is taken to minimise the risk of similar fraud occurring in future.

c) Management is responsible for;

- Ensuring that an adequate system of internal control exist within their areas of responsibility and that controls operate effectively;
- Preventing and detecting fraud;
- Assessing the type of risk involved in the operation for which they are responsible;
- Reviewing and testing the control systems for which they are responsible regularly;
- Ensuring that controls are being complied with and their system continue to operate effectively;
- Implementing new controls to reduce the risk of similar fraud occurring where fraud has taken place.

d) Internal audit is responsible for;

- Delivering an opinion to the Chief Executive Officer on the adequacy of arrangements for managing the risk of fraud and ensuring that the organization promotes an anti-fraud culture;
- Assisting in the deterrence and prevention of fraud by examining and evaluating the effectiveness of control commensurate with the extent of potential exposure/ risk in the various segments of the institution's operations;
- Ensuring that management has reviewed its risks exposures and identified the possibility of fraud as a business risk;
- Assisting management in conducting fraud investigations

e) Every member of the staff is responsible for;

- Acting with propriety in the use of official resources, handling and use of public funds. This may include but not be limited to cash, payment systems, receipts, supplies, dealing with suppliers, the use of IT equipments and placing orders and contracts;

- Preventing and detecting fraud;
- Being alert to the possibility that unusual events or transaction could be indicators of fraud;
- Reporting details immediately through the appropriate channel if they suspect that fraud has been committed or see any suspicious acts or events;
- Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

7.0 Fraud Notification Procedure

Staff and the entire public who suspect fraud should normally notify the Quality Assurance Department. Referrals can be made verbal or in writing. A referral form is attached to the policy (see Appendix E) that can be used for making written referrals. Staff should be assured that their anonymity will be preserved, save for situations in which the SSFR is required to disclose the information to the police, regulatory body or court of law and when their suspicions prove to be unfounded, and there will be no adverse criticism of them. All referrals should be treated as strictly confidential.

The institution has the following officers trained as Fraud Investigators

E-mail	Contact Details
audit1@csr.gov.rw interaffairs@csr.gov.rw	Telephone: +250-0788307963 Fax: +250-584445 Out of office hours: contact +250-0788303582/ +250-0788462159

Staff are also referred to the SSFR staff code of conduct and disciplinary procedures as regards to staff and public disclosures. In particular, they are reminded that they have a duty of

confidentiality to the fund and that unless contacting the media can be soundly justified in the public interest they are liable to be in breach of this duty of confidentiality.

Breach of an employee's duty of confidentiality will normally result in disciplinary action that could include dismissal.

8.0 Fraud Response Plan

SSFR has a fraud response plan that sets out how to report suspicions, how investigations will be conducted and concluded. This plan forms part of the organisation's fraud policy.

9.0 Conclusion

The circumstances of individual fraud will vary. The fund takes fraud very seriously. All cases of actual or suspected fraud will be vigorously and promptly investigated and appropriate action will be taken.

Appendix A-Fraud Response Plan

Introduction

This response plan provides a checklist of actions and a guide to follow in the event that fraud is suspected. It covers;

- Notifying suspected fraud;
- The investigation process;
- Liaising with police and internal affairs team;
- Initiation of recovery action;
- Reporting process

Its purpose is to define authority level, responsibility for action and reporting lines in the event of suspected fraud, theft or other irregularity.

Notifying Suspected Fraud

It is important that staff are able to report their concerns without fear of reprisal or victimisation and are aware of the means to do so. The CSR staff statute provides appropriate protection for those who voice genuine and legitimate concerns through the proper channels.

In the first instance, any suspicion of fraud, theft or any other irregularities should be reported, as a matter of urgency, by the staff member to the Director of Quality Assurance Department or line manager or another appropriate trusted person. If such action would be inappropriate, the concerns should be reported upward to one of the following persons;

- Staff's Senior Manager and/Head of department
- Director of Legal and Corporate Services
- Chief Executive Officer.

Every effort will be made to protect an informant's anonymity if requested. However, the organisation will always encourage individuals to be identified to add more validity to the accusations and allow further investigation to be more effective. In certain circumstances, anonymity can not be maintained. Where this can be anticipated the informant will be advised prior to the release of information. Any member of the staff receiving a "tip off" from another member of the staff has the responsibility to ensure that they keep the identity of the information confidential at all times except where the informant has had this issue discussed with them.

The Investigation Process

Suspected fraud must be investigated in an independent, open-minded and professional manner with the aim of protecting the interests of both the organization and the suspected individual(s). Throughout the investigation there will be a presumption of innocence until proven guilty ensuring at all times that suspicion is not seen as guilt to be proven.

The investigation process will vary according to the circumstances of each case and will be determined by the Director of Quality Assurance and Internal Audit. Internal Affairs officers will take charge of the investigation on a day- to -day basis. This is normally an independent group who have received training in carrying out investigations.

Where initial investigations reveal that there are reasonable grounds for suspicion, and to facilitate the on going investigation, it may be appropriate to suspend an employee against whom an accusation has been made as reflected in SSFR staff statute. However, other than extremely rare circumstances where the evidence is overwhelming, this will only ever be done after there has been some opportunity for the individual concerned to be advised of the charges against him/her and have been given time to respond. This decision will be taken by the Chief Executive Officer, in consultation with the Head of Human Resources and the Director of quality Assurance (investigation officer). Suspension should not be regarded as disciplinary action nor should imply guilt.

The process will follow the guidelines set out in SSFR's staff Code of Conduct and Disciplinary procedures relating to such actions. It is important, from the outset, to ensure that evidence is not contaminated, lost or destroyed. The investigating team will therefore take immediate steps to secure physical assets, including computers and any records thereon, and all other potentially evidential documents. They will also ensure, in consultation with management, that appropriate controls are introduced to prevent further loss.

The investigating Officer will ensure that a detailed record of investigation is maintained. This chronological file recording details of all telephone conversations, discussions meeting and interviews (with whom, who else was present and who said what), details of documents reviewed, tests and analyses undertaken, the results and their significance. Everything should be recorded, irrespective of the apparent significance at the time.

All interviews will be conducted in a fair and proper manner. Where there is a possibility of subsequent criminal action, the police will be consulted and interviews may be conducted under caution in compliance with the Criminal Evidence Act which governs the admissibility of evidence in criminal proceedings.

The findings of the investigation will be reported to the Chief Executive Officer and they together with the Head of Human Resources will determine, in consultation with the Director Quality Assurance (investigating Officer), what further action (if any) should be taken.

Liaison with Police

The police generally welcome early notification of suspected fraud, particularly that of serious or complex nature. Some fraud will lend themselves to automatic reporting to the police (such as theft by third party). For more complex fraud the Chief Executive Officer or the delegated executive director, following consultation with the Head of Human Resources and Director of Quality Assurance (investigating officer) will decide if any when to contact the police.

All staff will co-operate fully with any police or internal affairs enquiries which may have to take precedence over any internal investigation or disciplinary process. However, wherever possible

teams will co-ordinate their enquiries to maximize the effective and efficient use of resources and information.

Initiation of Recovery Action

SSFR will take appropriate steps, including legal actions if necessary, to recover any losses arising from fraud, theft or misconduct. This may include action against third parties involved in fraud or whose negligent actions contributed to the fraud.

Reporting Process

Throughout any investigation, the director of quality assurance (investigating Officer) will keep the Chief Executive Officer informed of progress and any developments. If the investigation is long or complex, interim report to the Audit Committee will be made. These reports may be verbal or in writing.

On completion of the investigation, investigating Officer will prepare a full written report setting out among others;

- Background as to how the investigation arose
- What action was taken in response to the allegations
- The conduct of the investigation
- The facts that came to light and the evidence in support
- Action taken against any party where the allegations were proved
- Action taken to recover any losses
- Recommendations and/or any action taken by management to reduce further exposure and to maximize any recurrence.

A copy of the above report will be submitted to the audit Committee.

In order to provide a deterrent to other staff, where wrong doing has been proven, a brief and anonymous summary of the circumstances may be published on intranet.

Appendix B –Dos & don'ts

Dos	Don'ts
Make a note of your concerns	Be afraid of raising your concerns
<p>Record all relevant details, such as the nature of your concern, the names of parties you believe to be involved, details of any telephone or other conversations with names, dates and times and any other witnesses.</p> <p>Notes do not need to be overly formal, but should be timed, signed and dated.</p> <p>Timeliness is most important. The longer you delay writing up, the greater the chances of recollections becoming distorted and the case being weakened.</p>	<p>The SSFR staff statute provides protection for employees who raise reasonably held concerns through the appropriate channels.</p> <p>You will not suffer discrimination or victimisation as a result of following these procedures and the matter will be treated sensitively and confidentially.</p>
Retain any evidence you may have	Convey your concern to any one other than authorised persons (listed in appendix A)
The quality of evidence is crucial and the more direct and tangible the evidence the better the chances of an effective investigation	There may be a perfectly reasonable explanation for the events that give rise to your suspicion. Spreading substantiated concerns may harm innocent person.
Report your suspicion promptly	Approach the person you suspect or try to investigate the matter your self.
In the first instance, report your suspicions to your line manager. if this action would be inappropriate, further guidance on disclosure attempt can be found in the fraud response in appendix	There are special rules relating to the gathering of evidence for use in criminal cases. Any attempt to gather evidence by persons who are unfamiliar with these rules may destroy the

A of this document	case.
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Appendix C –Reducing the Opportunities for Fraud

Promoting an Anti-Fraud Culture.

Introduction

Fraud prevention involves more than merely compiling anti-fraud policies. It also involves putting in place effective accounting and operational controls and the maintenance of an ethical environment that encourages staff at all levels to actively participate in protecting public money and property. Creating an anti -fraud culture involves;

- Having a clear statement of ethical values
- Establishing a clear anti-fraud policy and fraud response plan
- Promoting staff awareness on fraud
- Recruiting honest staff (checking references etc) and
- Maintaining good staff

Standard of Conduct

As a public institution, SSFR staff have to be seen with high standards of personal integrity. Staff should not accept gifts, hospitality or benefits of any kind from third party that might have been seen to compromise our integrity.

All staff should be reminded that they are bound by SSFR's staff code of conduct .

All principles set out in this code of conduct are standard in public life and also relevant here.

The Seven Principles

Selflessness- Holders of Public Office should take decision solely in terms of Public interest.

They should not do so in order to gain financial or material benefits for themselves, their family, or their friends.

Integrity-Holders of Public office should not place themselves under any financial or other obligation to outside individuals or organisation that might influence them in the performance of their official duties.

Objectivity-In carrying out Public business, including making public appointments or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability- holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness –Holders of public office should be as open as possible about all decisions and actions that they take. They should give reasons for their decisions and restrict information only when wider public interest clearly demands it.

Honest- Holders of public office have a duty to declare any private interest relating to their public duties and to take steps to resolve any conflict arising in the way that protect public interest.

Leadership –Holders of public office should promote and support these principles by leadership and example.

Reducing Opportunities for Fraud

Management must ensure that the opportunities for fraud are minimised. Separation of duties, effective procedures and checks should prevent or deter fraud from occurring. Opportunities to commit fraud may be reduced.

- By ensuring that a sound system of internal control proportional to risk has been established and it is functioning as intended.
- Through the fear factor (i.e. risk of being caught or the severity of the consequences)

- By changing attitudes to fraud.
- By making fraud too much effort to commit

Internal Control

Internal control is any action, procedure or operation undertaken by management to increase the likelihood that activities and procedures achieve their objectives.

Some fraudulent ways arise because of a system weakness of internal control, such as proper control over e.g. pressing of purchase order. Other frauds are as a result of failures to follow proper control procedures. It may be the result of carelessness in carrying out a check or it may be that too much trust has been placed in one individual with no effective separation of duties. Fraud that results from collusion may be more difficult to detect and prevent, as these types of fraud tend to operate within normal control environment.

In designing control, it is important that the control put in place is proportional to the risk. In most cases it is normally sufficient to design control to give a reasonable assurance of confirming losses with the risk appetite of the organisation. Every control action has an associated costs and it is important that the control action offers value for money in relation to risk that it is controlling. Generally speaking the purpose of control is to control risk to a reasonable level rather than to remove it entirely. An example of an appropriate internal control would be budget authorization levels where only a limited number of people can sign on a budget. An inappropriate internal control would be members of the same family signing each other expenses.

When risks and deficiencies in the level of control are identified it is necessary to choose the most appropriate type of controls within the above guidelines. In respect of fraud risks, prevention is almost always preferable to detection. Strong preventive controls should therefore be applied wherever possible.

The following range of controls should be considered always ensuring that a balance between identified risk and value for money maintained.

Physical Security. This is a preventive measure which controls or monitor access to assets, documentation or IT systems to ensure that there is no un authorised use, loss or damage.

Assets can range from the computer terminal that sits on desk to the cheques sent to pay out suppliers. As a general principle, assets should be held securely and access to them restricted as appropriate. The control should not only apply to the premises but also to computers, data base, documents and any other areas that are critical to the operation of the institution. It may even be appropriate to restrict knowledge of the existence of some assets.

Access to computer systems is an important area that should be very tightly controlled, not only to prevent unauthorised access and use, but also to protect the integrity of data- it is important for computer and data owners to secure information held on their systems which concerns third parties. The threat to computers can come from both inside and out side the organisation. Computers are also vulnerable to theft both in terms of Hard and Soft wares. This theft has the additional costs of potential major disruption to the core operation of the SSFR.

Supervision and checking of outputs. Supervision is the function by which managers scrutinise the work and performance of their staff. It provides a check that staff are performing to meet their standards and in accordance with instructions. It includes checks over the operation of controls by staff at lower levels. These act as both preventive and detective measures and involve monitoring the work methods and out put of staff. These controls are vital where staff are dealing with cash or accounting records.

Audit trail: This is largely a detective control, although its presence may have deterrent effect and thus prevent a fraud. An audit trail enables all transactions to be traced through a system from start to finish.

Monitoring: Management information should include measures and indicators of performance in respect of efficiency, effectiveness, economy and quality of service.

Evaluation: policies and activities should be evaluated periodically for economy, efficiency and effectiveness.

Budgetary and other financial controls: use of budgets and delegated limits for some categories of expenditure and other accounting controls should ensure that expenditure is properly approved and accounted for by responsible manager. This should limit the scope for fraud and may result in some types of fraud being detected.

The 'fear factor'

Major deterrents to perpetrating fraud are the risk of being caught and the severity of the consequences. The most important fact about deterrence is that it derives from perceived risk and not actual risk. An institution may manage to increase the actual risk of detection but it will only achieve a deterrent effect if it ensures that perceptions of risk change too. Ways in which institutions can do this include:

- General publicity
- Always taking appropriate action against known perpetrators of fraud.

APPENDIX D- Detecting Fraud

Introduction

Most research carried out indicates that fraud perpetrated by civil servants consistently reveals that much fraud is discovered through the normal operation of control procedures and information received from third parties. Other ways in which fraud is detected include:

- Suspicion
- Accident
- Internal/ External audit
- Confession; and
- Staff changes.

Normal Control Procedures

Well-designed and cost effective internal controls should identify majority of actual or attempted fraud. Examples of good internal controls include:

- Supervision and checking outputs;
- Separation of duties to ensure that key functions and controls are not performed by the same member of staff
- A complete and secure audit trail;
- Monitoring management information;
- Budgetary and other financial control;
- Independent reviews.

Fraud Indicators

Fraud indicators are clues or hints that closer look should be made at an individual, area or activity. All they can do is point the way for further detailed investigation.

Many fraudulent ways can come to light because suspicions arise by, for instance, the behaviour of certain individuals. Managers and staff should also be alert to any warning signs that might indicate that fraud is taking place. These may be;

- Staff under stress without a high workload.
- First to arrive in the morning, last to leave at night.
- Reluctance to take leave.
- Refusal of promotion.
- Unexplained wealth.
- Sudden change of lifestyle.
- New staff resigning quickly.
- Cosy relationships with suppliers/contractors
- Suppliers/contractors who insist on dealing with one particular member of staff.
- Greedy or has genuine financial need

To spot fraud indicators in individual areas or activities it is important that accepted practices have been established for the area or activity under review and that the auditor is familiar with them. The following are examples of possible fraud indicators:

- Unusual employee behaviour
- Key documents missing
- Inadequate or no segregation of duties
- Absence of Controls and audits trails.
- Inadequate monitoring to ensure that controls work as intended.
- Crisis management coupled with a pressured business environment.
- Unauthorised changes to system or work practices.
- Policies not being followed.
- Single vendors
- Splitting up requirement to get under small purchase requirements or to avoid prescribed levels of review or approval.
- Excessive hours worked by key staff.

- Consistent failure to correct major weaknesses in internal control.

FRAUD CASE REFERRAL FORM-APPENDIX E

NAME

ORGANISATION/PROFESSION

ADDRESS & TELEPHONE NUMBER

THIS ALLEGED FRAUD RELATES TO:

NAME

DEPARTMENT/POSITION

ADDRESS

Referrals should be made when you can substantiate your suspicions with one reliable piece of information

Suspicion

Please provide details

Possible useful contacts

Please attach any additional available information

Signed.....

Date.....

The fund's internal affairs team will undertake to acknowledge receipt of this referral direct to you within 5 working days unless otherwise requested

