



SEEMiSGroup LLP

Fraud Whistle Blowing for Third Parties Policy

October 2015

1. Introduction

- 1.1 SEEMiS Group LLP (SEEMiS) is committed to ensuring probity and accountability in all its activities and has a Fraud and Corruption Prevention Strategy that requires individuals and organisations with whom SEEMiS deals to behave towards SEEMiS with integrity.
- 1.2 SEEMiS is also committed to dealing, on a confidential basis, with any allegation of material fraud or malpractice brought to its attention by any contractor, supplier, organisation, or members of the general public. Such allegations may concern the conduct of those acting in the name of SEEMiS, contractors or suppliers, where they involve misuse of SEEMiS assets.
- 1.3 This Fraud Whistle Blowing Policy for Third Parties lays down the procedures whereby such matters can be brought to the attention of SEEMiS. Disclosures by employees are dealt with under the confidential procedures for reporting of concerns at work.

2. Handling reported incidents

- 2.1 SEEMiS will take seriously, all material matters raised in good faith by third parties.
- 2.2 Once a concern has been raised, SEEMiS will initially look into it and assess the action that should be taken. Within five working days the person raising the concern will be informed of how the matter is being handled, and whether further assistance will be required from them, provided that they have given their name and address. All concerns raised in good faith will be taken seriously, whether anonymous or not. However, it is more likely that an investigation will be effective if the person reporting a problem is able to answer questions of detail about it. Their identity will not be revealed outside the Internal Audit Section of South Lanarkshire Council, which will investigate the concern on behalf of SEEMiS.
- 2.3 When a person raises a concern, they may be asked how they think the matter might best be resolved. However, SEEMiS reserves the right to handle the concern as it thinks fit. If the person raising the concern has any personal interest in the matter they must disclose this at the outset. If they do not, and the interest becomes apparent later, the failure to declare an interest may affect the conclusions, and it will certainly affect the amount of feedback given to them.
- 2.4 While the purpose of this policy is to enable SEEMiS to investigate possible malpractice and to take appropriate steps to deal with it, feedback will be given to the person raising the concern, provided their identity is known.
- 2.5 If requested, SEEMiS will provide a written update within 21 days of the notification of the concern. This may indicate that the investigation has been completed or confirm that work is in progress. Notification will be given when the investigation has been completed.

- 2.6 Please be aware that SEEMiS may not be able to divulge the precise action that it has taken, or give the detailed results of an investigation, where this might:
- infringe a duty of confidence owed by SEEMiS to another person or organisation;
 - prejudice the investigation; or
 - result in a breach of either the Human Rights Act or the Data Protection Act.

3. Raising a Concern

- 3.1 Concerns should be raised, either:

in writing, addressed for the attention of the Audit Manager, SLC, Council Offices, Almada Street, Hamilton, ML3 0AB;

by telephoning the Audit Section (01698 455972); or,

by telephoning the Company Secretary, SEEMiS (01698 453948).

- 3.2 If a correspondent wishes their concern to be treated in confidence, this should be intimated at the outset, so that the appropriate arrangements for anonymity can be made.