

Tenth Constitution Counter Fraud Professional Accreditation Board

1 Name

1.1 The name of the body accrediting and overseeing the professional counter fraud training and qualifications will be the Counter Fraud Professional Accreditation Board hereafter referred to as 'the board'.

2 Representation on the board

2.1 The board will comprise:

2.1.1 One representative from each stakeholder organisation.

2.1.2 A representative from the government's national lead anti-fraud organisation.

2.1.3 A representative from the national lead police force on fraud.

2.1.4 Two representatives from the relevant higher education institutions.

2.2 Where, in respect of 2.1.5, there is more than two higher education institutions, these shall meet together and agree to nominate two representatives.

2.3 Other relevant professional bodies, agencies or groups may also attend by invitation of the Board to act in an advisory capacity as non-voting 'participating observers'.

2.4 Appendix 1, paragraph 1 specifies the stakeholder organisations covered by the board's remit. Any changes or additions to these stakeholder organisations shall be agreed by those present at a quorate board meeting.

2.5 Appendix 5 specifies the criteria for membership of the board, how an application can be applied for and the expected commitment to the work of the board once membership has been gained.

3 Role of the board

3.1 The board will seek to undertake the following role across England, Wales, Northern Ireland and Scotland:

3.1.1 To establish and maintain professional standards in the delivery of a portfolio of professional training courses and academic qualifications in the field of counter fraud work in line with the core learning aims and outcomes (see appendix 7).

3.1.2 To oversee the delivery of the training courses and academic qualifications taking into account their quality and effectiveness.

3.1.3 To ensure that individual courses, and the portfolio of courses as a whole, are conducted so that higher education credits can be awarded, and that in particular a recommended credit rating is communicated to the higher education institution(s).

3.1.4 To establish and maintain professional standards in the delivery of academic counter fraud qualifications based on agreed common syllabuses that are delivered by higher education institutions with successful completion resulting in professional awards.

3.1.5 To formally recognise the successful completion of accredited counter fraud training courses and academic qualifications with the bestowal of the appropriate award.

3.2 To actively promote accredited, professional training courses and academic qualifications for counter fraud specialists and to work with organisations with a common interest in the development of professional training and access to relevant programmes of higher education.

4 Key tasks of the board

4.1 The board will seek to undertake the following key tasks across England, Wales, Northern Ireland and Scotland:

4.1.1 To have custody for the syllabuses of the training courses and academic qualifications on behalf of the stakeholder organisations represented upon the board.

4.1.2 To establish procedures to recognise the successful completion of the courses and qualifications delivering these syllabuses.

4.1.3 To discuss the development and delivery of further higher education programmes of study within the board and in other academic, professional or other forums.

4.1.4 It is necessary that all members of the board are able to openly and freely discuss the business of the board but in doing so should note the directions in regard to any conflict of interest that may arise or they may have with other members (see appendix 6).

5 Accreditation

5.1 The successful completion of training and higher education courses recognised by the board or satisfactory demonstration of relevant skills and knowledge for 'Proficient' and 'Expert' level awards will result in the bestowal of the relevant professional qualification as outlined in appendix 2.

5.2 The board may establish other professional qualifications for the successful completion of recognised training and higher education courses.

5.3 The board shall publish procedures for the approval of courses by organisations to achieve the awards of the board and these shall include the core requirements of the awards.

6 Continuing professional development and an ethical framework

6.1 The board will establish a system of Continuing Professional Development (CPD) which will be available to all of its awards.

6.2 Technical skills must also be applied in an appropriate ethical manner. Therefore, in order to successfully complete the CPD scheme individuals must adhere to the *Principles of good practice* which are contained in appendix 8.

6.3 Those who successfully complete CPD and adhere to the six principles of good practice will be recognised with the additional title which includes the prefix 'Professional'. Subject to following the relevant CPD policy these award holders shall be entitled to retain this title for three years and during this period their details will be held by the secretariat. Award holders may also apply for an additional certificate for a fee if required.

6.4 There will be separate CPD schemes for both organisations and individual members although the requirements for meeting them will be the same. The board will also establish procedures to take account for extenuating circumstances of award holders.

6.5 Further details of the CPD schemes and the more detailed policies are contained in appendices which will also be made publicly available.

7 Quorum of the board

7.1 The quorum for meetings of the board will be at least half of those entitled to attend as members under paragraph two.

8 Meetings and proceedings

8.1 The board will meet no less than four times per year.

8.2 The board shall elect a chair and a vice-chair from the members at the first meeting and annually thereafter. The stakeholder organisations shall be entitled to send replacement members.

8.3 The chair of the board shall not have a vote on the board save where there is an equality of votes, when the chair shall have the casting vote.

8.4 Decisions to bestow the awards shall normally be made by majority agreement of the stakeholders attending any quorate board meeting.

8.5 The chair and vice-chair are authorised by the board to bestow awards between formal meetings in accordance with paragraph 3.1.5.

9 Financial arrangements for the board

9.1 The secretariat shall meet all costs associated with its activities including the production costs of award certificates and maintenance of the registers.

9.2 The secretariat will charge stakeholder organisations a uniform fee agreed by the board for each candidate bestowed an award.

9.3 Requests to check names against the registers of award holders will be referred to the relevant employer for validation of the person or organisation making the request.

9.4 Copies of the annual report may be provided by the secretariat at cost price.

10 Sub-committees of the board

10.1 The board shall establish the sub-committees as specified in appendix 4.

10.2 The Training, Education and Communications Sub-committee and the secretariat shall establish procedures for the approval and accreditation of higher education and training courses and publish them accordingly.

10.3 The board may establish other sub-committees and delegate responsibilities for these to undertake.

10.4 The membership of sub-committees will be determined by the board at the annual general meeting and may include relevant interests who are not members of the board in a non-voting capacity.

11 Review arrangements

11.1 The constitutional arrangements for the board will be reviewed one year after the date of its first meeting and as necessary thereafter.

11.2 Any changes to the constitution must be agreed by a two-thirds majority at a quorate board meeting.

Appendix 1: Board representatives

1 There are currently five stakeholder organisations which come within the board's remit (Representatives from this section cannot be involved in delivering CFPAB related training for commercial profit). These are:

- 1.1 Department for Work and Pensions and its Agencies (DWP).
- 1.2 Department of Health (DH) / National Health Service (NHS).
- 1.3 Her Majesty's Revenue and Customs.
- 1.4 Local government.
- 1.5 Her Majesty's Passport Office.

2 A representative from the national lead force on fraud (currently the City of London Police). Those attending on behalf of ACPO (typically from the Economic Crime Portfolio Training Sub-group).

3 Those attending on behalf of Higher Education institution(s) presently comprise:

- 3.1 Institute of Criminal Justice Studies, University of Portsmouth.

4 For each of the above a deputy shall be appointed.

Appendix 2: Professional qualifications

1 The CFPAB approves the following awards for candidates who have completed a recognised training course or for higher awards who demonstrated they meet the relevant standards according to CFPAB procedures:

Accredited Counter Fraud Technician (Developing)
 Accredited Counter Fraud Specialist (Foundation)
 Accredited Counter Fraud Specialist (Proficient)
 Accredited Counter Fraud Specialist (Expert)

Accredited Counter Fraud Intelligence Technician (Developing)
 Accredited Counter Fraud Intelligence Specialist (Foundation)
 Accredited Counter Fraud Intelligence Specialist (Proficient)
 Accredited Counter Fraud Intelligence Specialist (Expert)

Accredited Counter Fraud Manager

Accredited Counter Fraud and Counter Corruption Specialist (International)

The standards for the above awards will be published by the CFPAB and incorporate the standards of the Cabinet Office Counter Fraud Group.

For candidates who successfully demonstrate CPD according to the CFPAB policies may use the prefix 'Professional' before the award name.

2. The successful completion of a portfolio illustrating a recognised training qualification, possession of ACFS or ACFM and an appropriate proprietary check combined with a positive review of training if required will be recognised with the award of Accredited Counter Fraud Trainer (ACFT).

3. The successful completion of a relevant award at a recognised Higher Education Institution at Level 4 will be recognised by the award of a professional qualification designated Certified Counter Fraud Specialist (CCFS) by an ACFS award holder.

4 The successful completion by an ACFS award holder of a recognised bachelor's degree or masters degree will be recognised by the award of a professional qualification designated Graduate Counter Fraud Specialist (GCFS).

Appendix 3: Role of the secretariat

The secretariat is an administrative unit reporting to the board, responsible for providing administrative support for the informed decision-making of the board and its sub-committees.

Main tasks

- 1 It co-ordinates the activities of decision-making of the board, including planning, scheduling, and providing strategic advice.
- 2 A resource that provides assistance and advice to the chair, vice-chair, board members committee and sub-committee members.
- 3 Tracks items, plans and designs agendas for the committees and sub-committees of the board as outlined in appendix 4.
- 4 Provides editorial, content and distribution for a bi-annual board newsletter.
- 5 Arranges meetings to provide appropriate facilities and atmosphere for decision making.
- 6 Provides for meeting minutes and action follow-up in a timely manner.
- 7 Makes proposals for changes in conjunction on advice from officers of the board.
- 8 Ensures that standards are maintained and improved through quality assurance.
- 9 Provides advice on jurisdiction, policy, process, and precedent.
- 10 Manages the awards process including the distribution of certificates.
- 11 Provides orientation to new members of the board and its sub-committees.
- 12 Maintains common registers for award holders on behalf of the board including contact details: first name, last name, employer, 'region', date of accreditation, e-mail, postal address and certificate number.
- 13 Produce, on an annual basis, a publicly available evaluative overview of the professional training and education, an annual report, and to supply a copy to all stakeholder organisation representatives and participating observers of the board.
- 14 Periodically review the effectiveness of the delivery of the courses and qualifications drawing upon staff views, student surveys, external representative comments, and other assessments and evaluations of the courses.
- 15 To ensure that the stakeholder organisations' syllabuses for the course(s) and qualification(s) are tabled for the board's consideration, and that any proposed changes are promptly communicated to the board for its agreement.

Appendix 4: Committees and sub-committees of the board

The board shall establish the following sub-committee(s):

1 Training, Education and Communications.

2 Professional Conduct.

Appendix 5: Membership of the board criteria

1 Membership of the board shall be limited to organisations that meet the criteria in the paragraph below.

2 An organisation that employs 10 or more staff who are specifically employed to undertake work in any of the following areas:

- 2.1 Analysis of counter fraud intelligence and data.
- 2.2 Undertaking investigations into allegations of fraud.
- 2.3 Managing or supervising investigations into allegations of fraud.
- 2.4 Strategic oversight of counter fraud work.

Application for membership

3 An application for membership of the board should be made in the first instance in writing to the Secretariat of the board setting out the reasons for consideration of becoming a stakeholder and where they come within the above criteria.

4 Membership shall be at the sole discretion of the board and it is not required to explain its decision.

Commitment to membership

5 Having been accepted as a stakeholder on the board it is expected they:

- 5.1 Make a commitment to attend as many of the meetings that the board may convene, as they are able to do so. Should the nominated member be unable to attend a meeting then their deputy shall attend in their place. The secretariat should be advised of such anticipated action on each occasion.
- 5.2 Promptly attend to and respond to the board on any matters that they have agreed to undertake on its behalf or its sub groups including the submission of reports to the secretariat of the board to enable timely circulation prior to its next meeting.
- 5.3 The chair of the board shall having taken account of any reported circumstances as to the non attendance of the member or their nominated deputy of the board on 3 successive occasions shall contact the stakeholder to ascertain their reasons for such non-attendance and continued commitment to the aims of the board.

Appendix 6: Conflict of interest policy

Coverage

1 This policy applies to representatives of the board and its sub-committees.

Why do we need a policy?

2 Board representatives have an obligation to act in the best interests of the Board and in accordance with its constitution document to ensure that all organisations and their representatives meet the highest standards of professionalism and propriety at all times.

Conflict of interest

3 A conflict of interest can be defined as a situation in which a representative of the Board or its sub committees has competing professional or personal interests which means that, in certain circumstances, they may not be able to fulfil their duties or commitments without compromising their professionalism or impartially.

4 These conflicts of interests may arise where an individual's employers, personal or family interests and or loyalties conflict with those of the board.

5 Such conflicts may create problems and can:

- Inhibit free discussion.
- Result in decisions or actions that are not in the best interests of the board.
- Risk the impression that the board has acted improperly.
- The aim of this policy is to protect both the board and the individuals involved from any appearance of impropriety.

The declaration of interest

6 Accordingly, representatives of the board and its sub committees are requested to declare any interests that they may have and any gifts or hospitality that may conflict with their role on the board. A declaration of interests form is provided for this purpose, listing the types of interest one should declare, which will be circulated to representatives by the Secretariat on an annual basis and after completion returned under confidential cover.

7 The declaration of interest should also include details of 'family members' which are defined as:

- Spouse or civil partner, anyone with whom the representative lives with as a partner in 'an enduring family relationship', children and step children (both the representative's own and his partner's and the representative's parents).

8 To be effective, the declaration of interests needs to be updated at least annually and also when any changes occur. This may be done at the commencement of any meeting when taking account of the items for discussion and outlined on the agenda.

9 If the Board representative is not sure what to declare, or when the declaration needs to be updated, it is best to declare everything. Information and advice can be found by making contact with the Board's secretariat for confidential guidance. Interests will be recorded on the Board's register of interests, which will be maintained by the secretariat. The register will be accessible for inspection by all representatives of the Board by way of application to the chair of the board. It is stressed that the onus for this disclosure is upon the representative to be proactive in identifying potential conflicts of interest, taking appropriate action and making such details known.

10 Whilst not exhaustive, examples of occasions when a conflict of interest may be applicable would be:

- To share confidential information obtained during the course of the Board or its sub committees with others when not authorised to do so.
- Have an interest in the outcome of a decision into the award of business.
- To use information obtained during the course of the Board or its sub committees to the detriment of other Board representatives.
- To receive an inducement to make a favourable or non favourable decision.

Data protection

11 The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 1998. Data will be processed only to ensure that representatives of the Board and its sub committees act in its best interests. The information provided will not be used for any other purpose.

What to do if there is a conflict of interest

12 A representative of the Board or its sub committees should not be involved in decisions that directly affect the organisation that it represents. The representative should declare their interest at the earliest opportunity and withdraw from any subsequent discussion. This rule also applies if they face a conflict for any other reason. They may, however, having made such a declaration participate in discussions from which they or their organisation may indirectly benefit, for example where the benefits are universal to all users, or where your benefit is minimal.

13 If a representative fails to declare an interest that is known to the board, the chair or vice-chair will declare that interest to the other attending representatives.

Decisions taken where a board representative or member of staff has an interest

14 In the event of the Board having to decide upon a question in which a board representative or member of its staff has an interest, all decisions will be made by vote, with a two thirds majority required. A quorum must be present for the discussion and decision; interested parties will not be counted when deciding whether the meeting is quorate.

15 Interested board representatives may not vote on matters affecting their own interests or that of their organisation. They may participate in the discussion but not the decision-making process if considered appropriate by the board representatives. On occasions it may be necessary for the representative affected to be absented to any discussion, which if not undertaken voluntarily will be made by vote, with a two thirds majority required. A quorum must be present for the discussion and decision; interested parties will not be counted when deciding whether the meeting is quorate.

16 All decisions under a conflict of interest will be recorded by the board's secretariat and reported in the minutes of the meeting. The report will record:

- The nature and extent of the conflict.
- An outline of the discussion.
- The actions taken to manage the conflict.

Appendix 7: Core learning aims and outcomes
[To be inserted.]

Appendix 8: Principles of good practice

Technical skills alone are not enough. It is important that they are applied in an appropriate ethical manner. This framework of principles of good practice sets out the standards of conduct expected from professional award holders. These principles underpin all the professional awards and are a supplement to arrangements set out by employers.

1 Professionalism

Award holders should maintain the highest standards of professionalism. Specifically this should cover areas of personal conduct, expertise and all work taken to counter fraud. Any information or evidence must be obtained in a proper legal manner and recorded accordingly. The reputation of the professional qualifications must be paramount and award holders must not bring it into disrepute by any of their actions.

2 Objectivity

Award holders should undertake all work with an open mind, and in particular ensure that any evidence or information obtained is assessed without preconceptions. Consideration should be given to all interpretations that may be placed on such evidence or information.

3 Fairness

Award holders should act in a courteous, polite and considerate manner, and conduct all work applying proper standards of fairness and without discrimination in accordance with the relevant diversity and equal opportunities policies.

4 Expertise

Award holders have a duty to maintain the highest level of expertise and to ensure that this is applied thoroughly and comprehensively in every aspect of counter fraud work that is undertaken.

5 Propriety

Award holders have a duty to ensure that they meet the highest standards of propriety. It must be ensured that in all personal and financial areas the integrity of those undertaking counter fraud work is never undermined. Proper, accurate records, which meet the legislative requirements, must be kept on all aspects of work with particular reference to issues of confidentiality so that information is passed only to those who are entitled to receive it.

It is not enough merely to ensure that this propriety is maintained it is also essential that there is never any perception of impropriety.

6 Vision

Award holders should ensure that the work undertaken is understood in the context of all action taken to counter fraud, bribery and corruption and develop an anti-fraud culture. This should also include promoting fraud awareness generally, encouraging the active participation of other relevant agencies and the implementation of a clear multi-agency approach.