



CPSS Procedure for Reporting Suspicions Internally and to the Police On behalf of Surrey and Sussex LPC's

This policy outlines the process for reporting suspicious internal activity and when you should report these suspicions to the police.

Defining suspicion

Suspicious Activity Reports (SARs) are formal reports submitted by a person to alert the Exec of CPSS or if serious suspicions are raised the Police, in relation to but not limited to potential money laundering, sexual exploitation, financing contrary to the employment contract, receiving gifts or income which is not declared or compromises the integrity of CPSS or the LPC's.

Suspicious activity can take various forms it is important to understand what suspicious activity means and the signs to look out for.

This includes but is not limited to:

- A feeling or belief that a person is dishonest.
- An idea that there may be fraudulent or dishonest activity taking place.
- Suspected fraudulent claims.
- If the suspicion relates to bullying, harassment or other, please refer to the whistleblowing policy.

Identify what is happening

- Who?
- What has happened?
- Where is this happening?
- Any additional information?

Reporting process

- In the first instance all suspicious activity should be reported to your line manager, Exec team or Chair of the LPC.
- If the suspicion affects the line manager, this should be reported to the HR Lead.
- A written report will be completed and submitted to the appropriate person detailing the suspicious activity.
- An investigation will take place.
- If the suspicion is serious such as sexual exploitation, money laundering etc this should be reported to the appropriate person immediately and the police will be informed either via 999 or 101.

Investigating the suspicion

- Once the report has been submitted, this is fully investigated.
- The person who is named in the suspicious activity report will be interviewed and asked questions to gather information.

- Interviewing the named person will require two people to ensure there is a note taker who is separate to the investigation ensuring a fair process is in place.
- The person being interviewed may wish to have a companion such as legal representation or a witness for their own protection.
- Evidence will be gathered internally and shared with the police if appropriate.
- The investigation will be fully documented.
- The named person will sign the record as a true reflection of the meeting and the interviewees will sign the record.
- The next steps depend on the outcome of the investigation.

Potential outcomes

- No action, the investigation has found no suspicious activity.
- A fitness to practice referral to the GPHC where appropriate.
- Termination of employment in line with CPSS contractual framework.
- A referral to the police for investigation via 101.
- If immediate danger or serious activity has taken place a 999 call will be made to alert the police.

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