

COUNTER FRAUD AND CORRUPTION POLICY

Incorporating the Fraud and Corruption Prosecution
Policy and the Anti-Bribery Policy

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1 Introduction

- 1.1 Fraud committed against the Authority represents the theft of taxpayer's money. It is unlawful and deprives the Authority of resources which should be available to provide services to the public. The Authority must have effective measures in place to counter risks of fraud and corruption, to help reduce losses and to minimise the impact on services.
- 1.2 This document sets out the Authority's policy on countering fraud and corruption risks. It includes overall arrangements and responsibilities for preventing, detecting and deterring fraud. It includes the Fraud and Corruption Prosecution Policy at annex A and the Anti-Bribery Policy at annex B. It forms part of the Authority's overall policy framework for combating fraud and corruption and should be read in conjunction with other relevant guidance and policies including the following.
- The Constitution
 - Financial Procedure Rules
 - Procurement and Contract Procedure Rules
 - Counter Fraud and Corruption Strategy
 - Whistleblowing Policy
 - Anti-Money Laundering & Terrorist Financing policy
 - Disciplinary Procedures

2 Definitions and Scope

- 2.1 For the purpose of this policy, the term fraud is used broadly to encompass:
- acts which would fall under the definition in the Fraud Act (2006)
 - anything which may be deemed fraudulent in accordance with the generally held view of fraud as causing loss or making a gain at the expense of someone by deception and dishonest means
 - any act of bribery or corruption including specific offences covered by the Bribery Act (2010)
 - acts of theft
 - any other irregularity which is to the detriment of the Authority whether financially or otherwise, or by which someone gains a benefit they are not entitled to.
- 2.2 This policy does not cover fraud or corruption against third parties, except in circumstances where there may also be a detriment to the Authority. It does not cover other acts – for example offences involving violence – which may affect the Authority, which in most cases should be reported directly to the police.

3 Principles

- 3.1 The Authority will not tolerate fraud or corruption in the administration of its responsibilities, whoever commits it. This includes, for example:
- councillors
 - officers
 - customers receiving services
 - third party organisations contracting with the Authority
 - organisations or individuals receiving funding from the Authority
 - any other agencies the Authority has business dealings with
- 3.2 There is a basic expectation that councillors, employees, and contractors' staff will act with integrity and with due regard to matters of probity and propriety. All representatives of the Authority are required to act lawfully and comply with all rules, procedures and practices set out in legislation, the Constitution, the Authority's policy framework, and all relevant professional and other codes of practice.
- 3.3 The Authority will seek to assess its exposure to risks of fraud and corruption. It will prioritise resources available to prevent and deter fraud to help minimise this risk.
- 3.4 The Authority will take all allegations and suspicions of fraud seriously, regardless of the source. It will consider any issues raised and if appropriate will undertake an investigation to confirm whether fraud has occurred and determine appropriate outcomes. Investigations undertaken will be proportionate to the circumstances of the issues raised. The Authority may refer any incident of suspected fraud to the police or other agencies for investigation, where appropriate.
- 3.5 To act as a deterrent, the Authority will take action in all cases where fraud (or an attempt to commit fraud) is proven, in proportion to the act committed and through any appropriate route. This may include prosecution, application of internal disciplinary procedures, referral under relevant codes of conduct or to a professional body, or any other action appropriate to the offence. Prosecution decisions will be made in accordance with the Fraud and Corruption Prosecution Policy which is contained in annex A.
- 3.6 As a further deterrent, and to minimise losses, the Authority will attempt to recover any losses incurred through civil or legal action. In addition, the Authority will seek to apply any appropriate fines or penalties, and recover any costs incurred in investigating and prosecuting cases.
- 3.7 The Authority will not tolerate any form of bribery. This includes bribes offered to or by employees, councillors, or suppliers. Any act of bribery puts the Authority at risk of committing a criminal offence. Further details about the Authority's measures to prevent and detect bribery are contained in the Anti-Bribery Policy which is attached at annex B.

4 Responsibilities

- 4.1 Overall responsibility for counter fraud arrangements rests with the Chief Finance Officer (Section 73 Officer) on behalf of the Authority. The Chief Finance Officer has a responsibility for ensuring the Authority has appropriate measures for the prevention and detection of fraud and corruption.
- 4.2 The Audit and Governance Committee has a responsibility to consider the effectiveness of counter fraud and anti-corruption arrangements at the Authority. This includes monitoring of Authority policies on raising concerns at work and countering the risks of fraud and corruption.
- 4.3 Management board are collectively responsible for ensuring that the Authority has effective counter fraud and corruption procedures; that these comply with best practice and good governance standards; and that they are embedded across the organisation.
- 4.4 Veritau (who provide internal audit and counter fraud services to the Authority) is responsible for reviewing the Authority's counter fraud and corruption policies on a regular basis and recommending any changes needed. In addition, Veritau leads on fraud prevention and detection for the Authority and is responsible for investigating suspected cases of fraud or corruption. The internal audit team carries out audit work to ensure that systems of control are operating effectively. This helps to reduce opportunities for fraud to be committed.
- 4.5 All managers are responsible for preventing and detecting fraud in their service areas. This includes maintaining effective systems of control and ensuring that any weaknesses identified are addressed promptly.
- 4.6 The Authority has a Chief Money Laundering Compliance Officer (CMLCO) who has oversight of all Authority anti-money laundering arrangements and is specifically responsible for overseeing money laundering regulations.
- 4.7 All staff should be aware that fraud and corruption is a threat to the Authority and are required to report any suspicions of fraud to Veritau. Where appropriate, staff can use the Whistleblowing Policy to raise concerns anonymously.
- 4.8 Officers within Human Resources are responsible for supporting service departments when pre-disciplinary investigations are required, or disciplinary processes are to be applied.

5 Overall Counter Fraud Arrangements

Introduction

- 5.1 The purpose of this section is to set out the Authority's overall framework for countering the risks of fraud and corruption. The Authority aims to follow best practice in countering fraud risks¹, but recognises that new and emerging fraud risks require a dynamic approach to fraud prevention and detection.

Measurement

- 5.2 The Authority will assess potential risks and losses due to fraud and corruption. It will use this information to prioritise counter fraud activity and determine the resources needed to mitigate those risks. A summary of fraud risks and proposed counter fraud activity will be reported to the Audit and Governance Committee on an annual basis.

Culture

- 5.3 The Authority will promote a culture where all employees, councillors, service users, and contractors are aware that fraud or corruption in any form is unacceptable. To do this, it will:
- ensure that there are clear arrangements in place for anyone to report suspicions of fraud or corruption (including employees, councillors, partners, contractors, the public or any other stakeholders)
 - investigate suspicions reported and take appropriate action wherever evidence of fraud or corruption is found
 - ensure that the consequences of committing or taking part in fraud or corruption are widely publicised.

Prevention and Detection

Controls

- 5.4 As part of normal operations the Authority aims to ensure that proper systems of internal control are in place. This includes controls that can directly prevent and detect fraud. For example, separation of duties, management review, vetting as part of recruitment processes, and systems for declaring interests or gifts and hospitality. The effectiveness of the systems of control are monitored by internal audit and reported to the Audit and Governance Committee.

¹ For example the CIPFA Code of Practice on Managing the Risk of Fraud and Corruption

- 5.5 Services will be encouraged to consider the risk of fraud as part of the Authority's risk management process. Any information on risks identified will be used to inform the annual review of counter fraud activity.

Proactive Work

- 5.6 The Authority will carry out targeted project work (for example data matching exercises) to identify fraud and corruption in known high risk areas. This work will be carried out by Veritau as part of its annual work plan. Resources will be prioritised based on an annual assessment of fraud and corruption risks. Work may include joint exercises with other agencies, including other Authorities and Councils.
- 5.7 The Authority will take part in projects led by other agencies that can help to identify potential fraud and corruption, as appropriate. Resources will be allocated to take part in these exercises and to follow up any high-risk data matches identified. Veritau will support service departments to ensure data is available to be used for matching exercises – for example advising on data protection considerations.

Relationships

- 5.8 The Authority will establish and maintain relationships with external agencies that can help it prevent and detect fraud. These include:
- the police
 - the courts
 - relevant government departments and agencies
 - councils
 - other public sector organisations
 - charities, community and voluntary groups.
- 5.9 Veritau will work with Authority departments to ensure that systems for reporting and investigating suspected fraud and corruption are robust.

Fraud Awareness Training

- 5.10 As part of the annual counter fraud workplan, Veritau will provide targeted fraud awareness training to groups of staff in areas at higher risk of fraud and corruption.

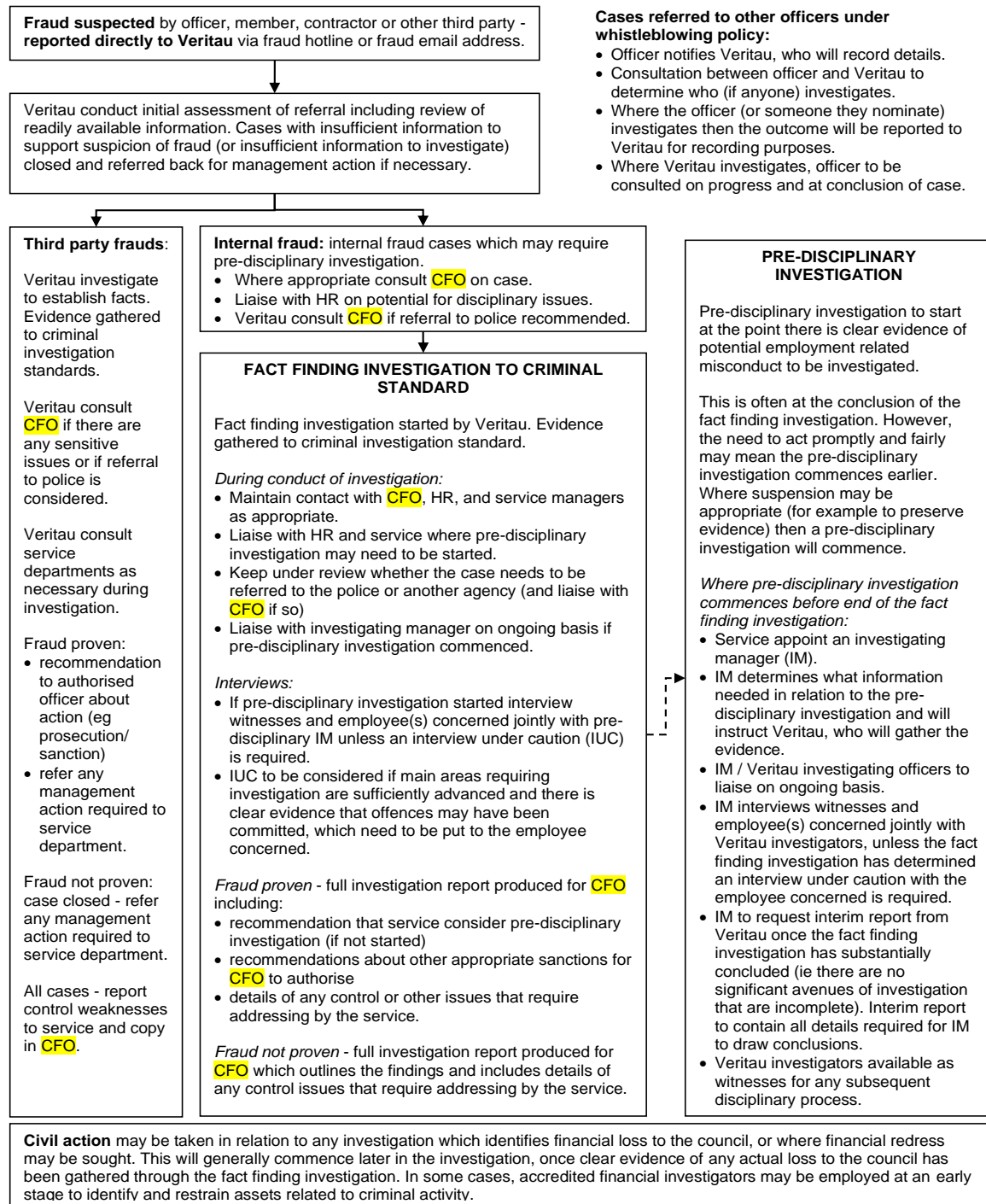
Investigation

- 5.11 Suspected cases of fraud, corruption, theft, or other irregularities considered a high risk will be investigated. The nature of the investigation will depend on the circumstances of each case. Any suspected fraud should be reported to Veritau in the first instance. Veritau will assess all cases referred and provide advice on whether other agencies should be notified (such as the police). In more complex cases, the extent of investigation required will be decided in consultation with the

Chief Finance Officer (s73 Officer) and the Monitoring Officer, service department, and human resources, as appropriate. Where necessary, Veritau may refer cases to other agencies (for example the police) at the discretion of the Head of Internal Audit. Figure 1 overleaf outlines the fraud referral and investigation process.

- 5.12 All staff involved in the investigation of fraud will be appropriately trained. They will be required to comply with any relevant legislation and codes of practice. For example, the Police and Criminal Evidence Act (PACE), Investigatory Powers Act (IPA), Regulation of Investigatory Powers Act (RIPA), the UK General Data Protection Regulation (UK GDPR), the Criminal Procedure and Investigations Act (CPIA), and any relevant guidance from the Attorney General. Investigators will consider the individual circumstances of anyone subject to investigation; adjustments to procedure will be made where necessary to ensure that all parties are treated equitably (where it is appropriate and reasonable to do so).
- 5.13 Every investigation will consider whether weaknesses in controls have contributed to the fraud or error occurring, in addition to other objectives. Where needed, recommendations to improve controls will be made.

Figure 1: York and North Yorkshire Combined Authority investigation process



- 5.14 The Head of Internal Audit will ensure that systems for investigating fraud are reviewed on an ongoing basis, to ensure that they remain up to date and comply with best practice.

Publicity

- 5.15 Targeted publicity will be used to raise awareness of fraud risks to employees, councillors, the public, and other agencies. This will include internal and external publicity. The aim of this will be to ensure that stakeholders:
- are alert to the risks of fraud and corruption
 - know how to report suspicions of fraud
 - are aware that the Authority's will not tolerate fraud and corruption.
- 5.16 The Authority will publicise all successful prosecutions by itself or by partner organisations, to act as a deterrent against future fraud.

Recovery of Monies

- 5.17 Fraud and corruption will generally result in a loss to the Authority or additional costs being incurred. Where this is the case, the Authority will seek to recover its loss (or costs) from the individual(s) or organisation responsible. This action helps to reduce the financial impact of fraud and acts as a deterrent. As a further deterrent, the Authority will seek to apply any appropriate fines or penalties where it is possible and desirable to do so.
- 5.18 Methods of recovery include (but are not limited to):
- civil enforcement through the courts
 - recovery from assets held by the organisation or individual using the Proceeds of Crime Act or other relevant legislation
 - recovery from salary payments for Authority employees
 - recovery from pension benefits for members of the LGPS
 - petitioning for bankruptcy if appropriate.

6 Monitoring & Review Arrangements

- 6.1 The arrangements set out in this policy will be reviewed on an annual basis as part of the counter fraud workplan. If required, updates will be presented to the Audit Committee for approval.

ANNEX A - FRAUD AND CORRUPTION PROSECUTION POLICY

1 Scope and Purpose

- 1.1 The Authority is committed to deterring fraud and corruption and recovering public funds. The decision to prosecute an individual is always a serious matter; however fair and effective enforcement is essential in protecting the Authority from fraud.
- 1.2 Prosecution has a serious effect on suspects, witnesses, victims, and the public, so it is essential that the Authority makes fair, consistent, and timely decisions in all cases. Where appropriate, lesser sanctions can be considered instead of prosecution.
- 1.3 This policy sets out the decision-making process for those cases where fraud or corruption has been found to have been committed against the Authority². Decisions should be fair, appropriate, and in the best interests of both the public and the Authority.
- 1.4 The policy is based on principles set out in the Crown Prosecution Service's [Code for Crown Prosecutors](#).

2 Principles

- 2.1 All decisions on intended prosecutions should be transparent and independent from the investigating officer(s) involved in the case. Any decision to prosecute should only be made after a review by appropriate officers and be authorised by a senior officer. All decisions and the reasons for them should be properly documented.
- 2.2 When making decisions on prosecutions, officers must be fair and objective. They must not let any personal views about the ethnic or national origin, gender, disability, age, religion or belief, sexual orientation or gender identity of the suspect, defendant, victim or any witness influence their decisions. Neither must they be motivated by political considerations. In prosecuting individuals, the Authority must always be acting in the interests of justice and not solely for the purpose of obtaining a conviction. Decisions should be consistent with Authority policy and the law on equalities and human rights. The circumstances of the offence and any mitigation offered by the offender should be taken into consideration when making a decision.
- 2.3 The consistent application of the policy will help ensure that those who have perpetrated fraud and corruption are appropriately penalised. It will also act as a

² This policy does not cover internal disciplinary procedures which are the subject of separate policies, nor does it cover offences other than fraud and corruption which are dealt with by relevant service departments under other policies and specific legal powers.

meaningful deterrent to those who are contemplating committing fraud or corruption. The Authority recognises the deterrent value of good publicity and therefore information regarding successful prosecutions and sanctions will be made public.

- 2.4 Staff and members who are found to have committed fraud or corruption against the Authority may be prosecuted in addition to such other action(s) that the Authority may decide to take, including disciplinary proceedings in the case of staff, and referral to the Standards Committee in the case of members. Any decision not to prosecute a member of staff for fraud and corruption does not preclude action being taken in accordance with the Authority's disciplinary procedures or other policies.
- 2.5 Irrespective of the action taken to prosecute the perpetrators of fraud and corruption, the Authority will take whatever steps necessary to recover any losses incurred, including taking action in the civil courts.

3 Prosecution

- 3.1 Not every contravention of the law should be considered for prosecution. The Authority should weigh the seriousness of the offence alongside other relevant factors, including the circumstances of the offender, the level of any financial loss to the Authority, mitigating circumstances and other public interest criteria.
- 3.2 A prosecution should only be considered if the investigation has passed two tests: the evidential test and the public interest test.
- 3.3 To pass the evidential test, authorised officers must be satisfied that there is a realistic prospect of conviction based on the available evidence (that is, there must be sufficient admissible, substantial and reliable evidence to secure a conviction). They should also consider what the defence case may be, and how it is likely to affect the prospects of conviction.
- 3.4 In deciding whether there is sufficient evidence to prosecute, the Authority should consider the following questions:
- Is the evidence admissible in court
 - Is the evidence reliable
 - Is the evidence credible
 - Is there any unused or unexamined material that might undermine the proposed charges
 - Is there any additional evidence that could be obtained through further reasonable lines of enquiry?

- 3.5 Where there is sufficient evidence to justify a prosecution, authorised officers should consider whether a prosecution is required in the public interest. They should consider:
- How serious is the offence committed
 - What is the level of culpability of the suspect
 - What are the circumstances of, and harm caused to the victim
 - What was the suspect's age and maturity at the time of the offence
 - What is the impact on the community
 - Is prosecution a proportionate response
 - Do sources of information require protecting?
- 3.6 Where an investigation is found to meet the evidential test, but not the public interest test consideration should be given to lesser sanctions such as a formal written.
- 3.7 Investigating officers and prosecutors will review the appropriateness of pre-charge engagement where prosecution is considered. This is likely to occur where such engagement may lead the defendant to volunteer additional information that may identify new lines of inquiry. Pre-charge engagement may be instigated by the investigating officer, the prosecutor, the defendant's representative or a defendant themselves (if unrepresented).

4 Alternatives to Prosecution

- 4.1 If a case is considered strong enough for prosecution but there are mitigating circumstances which cast a doubt as to whether a prosecution is appropriate, then the Authority may consider the offer of a formal written warning instead.

Formal Written Warnings

- 4.2 A formal written warning can be given to a person who has committed an offence, as an alternative to prosecution in certain circumstances. All warnings are recorded internally and kept for six years. If a person who has received a formal warning re-offends then this will influence the decision on whether to prosecute or not.
- 4.3 For less serious offences a formal warning will normally be considered where there is no significant public interest in prosecuting, and it was a first offence. Only in very exceptional circumstances will a further warning be issued for a second or subsequent offence of the same nature.
- 4.4 Offenders will usually be asked to attend the Authority's offices to receive the formal written warnings in person. For more minor offences an advisory letter can be issued by post.

5 Proceeds of Crime Act 2002 (POCA)

- 5.1 In addition to the actions set out in this policy, the Authority reserves the right to refer all suitable cases for financial investigation with a view to applying to the courts for restraint and/or confiscation of identified assets. A restraint order will prevent a person from dealing with specific assets. A confiscation order enables the Authority to recover its losses from assets which are found to be the proceeds of crime.

6 Implementation Date

- 6.1 This policy is effective from February 2024 and covers all decisions relating to prosecutions and sanctions after this date.

ANNEX B - ANTI-BRIBERY POLICY

1 Introduction

- 1.1 The Bribery Act became law in 2011. It enables appropriate action to be taken against all forms of bribery.
- 1.2 Bribery is defined as the offering, giving, receiving, or soliciting of any item of value to influence the actions of an official or other person in charge of a public or legal duty. The act of bribery is the intention to gain a personal, commercial, regulatory, or contractual advantage. The Authority does not tolerate any form of bribery.
- 1.3 Facilitation payments are unofficial payments made to public officials to secure or expedite actions. These are not tolerated and are illegal.
- 1.4 This policy should be read in conjunction with the Authority's Gifts and Hospitality policy.

2 Principles

- 2.1 The Authority is committed to preventing, detecting, and deterring bribery. It aims to:
 - ensure all employees, workers, councillors, and other relevant groups are aware of their responsibilities under this policy by publicising it and providing training
 - encourage employees to be vigilant and report any suspicions of bribery
 - investigate any allegations of bribery or assist the police or other agencies in any investigations or prosecutions they undertake
 - take action against anyone involved in bribery in relation to Authority business.

3 Scope

- 3.1 This policy relates to all Authority activities. It applies to employees, workers, agency staff, volunteers, consultants, and councillors.
- 3.2 For partners, joint ventures, and suppliers, we will seek to promote the adoption of policies consistent with the principles set out in this policy.
- 3.3 The Authority requires employees, councillors and other relevant people to:
 - raise concerns if they believe that this policy has been breached or may be breached in the future
 - comply with the spirit, as well as the letter, of the laws and regulations of all jurisdictions in which the Authority operates, in relation to the lawful and responsible conduct of activities.

- 3.4 As well as potential civil action and criminal prosecution, employees breaching this policy may face disciplinary action. This could result in dismissal in cases of gross misconduct.

4 Offences

- 4.1 There are four key offences under the Bribery Act 2010.

Section 1 – Offence of bribing another person

- 4.2 This section makes it an offence when a person offers, promises, or gives a financial or other advantage to another person and intends the advantage to induce a person to perform improperly a relevant function or activity or to reward a person for the improper performance of such a function or activity.
- 4.3 It is also an offence when a person offers, promises, or gives a financial or other advantage to another person and knows or believes that the acceptance of the advantage would itself constitute the improper performance of a relevant function or activity.

Section 2 – Being bribed

- 4.4 This section makes it an offence when a person requests, agrees to receive or accepts a financial or other advantage intending that, in consequence, a relevant function or activity should be performed improperly.
- 4.5 It is an offence when a person requests, agrees to receive or accepts a financial or other advantage and the request, agreement, or acceptance itself constitutes the improper performance of the person of a relevant function or activity.
- 4.6 It is an offence if a person requests, agrees to receive or accepts a financial or other advantage as a reward for the improper performance of a relevant function or activity.
- 4.7 It is also an offence if a person in anticipation of or in consequence of the person requesting, agreeing to receive, or accepting a financial or other advantage, a relevant function or activity is performed improperly.

Section 6 – Bribery of foreign public officials

- 4.8 Under this section of the Act an offence is committed when a person intends to influence a foreign official in their official capacity and intends to obtain or retain business or an advantage in the conduct of business.
- 4.9 It is also an offence to offer, promise or give any financial or other advantage to a foreign public official.

Section 7 – Failure of a commercial organisation to prevent bribery

- 4.10 A relevant commercial organisation is guilty of an offence if a person associated with the organisation bribes another person intending to obtain or retain business for the organisation or to obtain or retain an advantage in the conduct of business for the organisation and the organisation fails to take reasonable steps to implement adequate procedures to prevent such activity.

Corporate responsibility

- 4.11 While the first three offences of the Bribery Act relate to the actions of people, a section 7 offence relates to the inaction of an organisation to prevent bribery. The legislation was drafted with commercial businesses in mind and after the legislation was adopted there was some debate as to whether public sector organisations could be found liable of the offence. In 2012 the government published guidance which clarified that any public sector organisation that “engages in commercial activities, irrespective of the purpose for which profits are made”³ could be found guilty of a Section 7 offence.
- 4.12 York and North Yorkshire Combined Authority should be considered as commercial organisation under the legislation and could therefore be found to be corporately responsible for acts of bribery that occur within it. It is therefore important that it takes steps to prevent bribery from occurring.
- 4.13 If an offence has occurred, then the courts will consider six tests to determine whether the Authority had any responsibility for the act.
- Does the Authority have proportionate procedures in place to prevent bribery by persons associated with it? These should be clear, practical, and accessible?
 - Is there top-level commitment to preventing bribery? This includes support by councillors as well as officers.
 - Is the Authority’s exposure to potential external and internal risks of bribery periodically assessed?
 - Does the Authority take a proportionate and risk based approach to mitigate bribery risks?
 - Are anti-bribery policies and procedures embedded and understood throughout the organisation? Are they communicated internally and externally?
 - Are procedures monitored and reviewed regularly?

³ Paragraph 35 of Bribery Act 2010: Guidance to help commercial organisations prevent bribery
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/832011/bribery-act-2010-guidance.pdf

Penalties

- 4.14 A person guilty of an offence under sections 1, 2, or 6 of the Bribery Act may be sentenced to:
- a maximum prison sentence of 12 months and/or a fine not exceeding £5,000 (if convicted in a magistrates court)
 - a maximum prison sentence of 10 years and/or an unlimited fine (if convicted at a crown court).
- 4.15 An organisation found guilty of allowing bribery offences to occur may be subject to an unlimited fine that is in part determined by the gain that was sought to be made through bribery offences and an assessment of an organisation's culpability by the court.

5 How to raise a concern

- 5.1 All stakeholders have a responsibility to help the Authority prevent and detect bribery and corruption. Any suspicions should be reported as soon as possible.
- 5.2 Members of staff should report suspicious activity to the counter fraud hotline on 0800 9179247 or by email to counter.fraud@veritau.co.uk. Alternatively, employees, workers, or contractors may raise concerns through the Authority's Whistleblowing arrangements.
- 5.3 The Authority will support anyone who reports suspicions or raises concerns, even if those concerns prove to be incorrect. It is committed to ensuring nobody suffers detrimental treatment because they refuse to take part in bribery or corruption, or because they report a concern that they believe is true.

6 What to do if someone reports a concern

- 6.1 All reports of possible bribery should be reported without delay to the Chief Finance Officer (s73 Officer), the Monitoring Officer and Veritau.