

## **FRAUD AND BRIBERY POLICY**

Fraud is defined in this policy as an act carried out either by an internal source (staff, trustee, volunteer etc) or external source with the deliberate intention of deceiving the Foundation, its beneficiaries, grantees or the general public to gain a personal advantage, or cause loss to another. It covers acts varying from theft to false accounting and bribery, from a supplier who dishonestly invoices for work that they haven't done, to the candidate who falsely claims qualifications on their CV. It may involve not telling the truth, failing to say something when you should, or abusing your position.

The Foundation has a zero-tolerance approach to fraud and corruption of any type or in any circumstances, whether perpetrated by staff, Trustees, volunteers, contractors, partners, grantees or other and is determined to prevent, and where this is not possible to detect and investigate such acts.

The Foundation expects that its trustees, staff and volunteers will always have the highest standard of honesty.

### **1. Preventing and detecting fraud and corruption**

Fraud prevention and detection is the responsibility of everybody in the Foundation. All can be aware of the risk of fraud and suggest processes for preventing and detecting many frauds. Linked to this policy is the Fraud Mitigation Policy.

### **2. Promoting an anti-fraud and anti-corruption culture**

The Foundation aims to attract Trustees, employees and others who have a positive attitude to protecting and making best use of its assets as well as achieving its objectives.

The anti-fraud and bribery policy is supported by other policies including the Whistleblowing Policy and ICT policy.

### **3. Deterrence and detection**

Although Trustees are ultimately responsible for reducing opportunities for fraud and corruption and improving detection rates, the Senior Management Team will lead the process. In addition, all staff should share some responsibility in this area. This can be done by:

1. Identifying the risks to which our assets are exposed
2. Developing adequate controls
3. Ensuring effective compliance with controls.

The documentation of systems and controls, not just in Finance but throughout the Foundation's activities is important. It is not just about having those systems and controls written down, they need to be subject to 'critical review' by all staff members to identify, and raise the subject of, potential residual risks.

Major deterrents to perpetrating fraud and corruption are the risk of being caught and the severity of the consequences. The Foundation will take robust action, including prosecution, against those who commit fraud. In addition to reporting the fraud to the Police, the Foundation will actively pursue the recovery of monies, using legal means, when appropriate.

Staff should report suspicions of fraud, knowing they are protected under the Whistle Blowing Policy. Contractors, suppliers, grantees and the public are also encouraged to report their suspicions.

#### **4. Reporting**

It is the responsibility of all staff to report suspected, actual or attempted fraud or corruption. The provisions of the Whistleblowing Policy can be followed in such circumstances.

All reported instances of actual, attempted or suspected fraud or corruption will be investigated and appropriate action taken against the perpetrator. Control weaknesses identified as a result of reported instances will be addressed with immediate effect to prevent future similar occurrences.

All instances will be reported to the Chair of the Audit & Risk Committee and Chair of Trustees when they come to light. In addition, the Chief Operating Officer will maintain a register of all frauds and corrupt practices, actual and attempted, and report on these matters, including actions taken, to the Audit & Risk Committee.

There is a requirement to report major instances of fraud or corruption to the Charity Commission as soon as these come to light (through a Serious Incident Report) and on an annual basis as part of the Charity Commission Annual Return. The Charity Commission must also be informed of any reporting to the Police. The Chief Operating Officer is responsible for making these disclosures and completing the annual return to the Commission.

Approved: Audit and Risk Committee 10 June 2025