

<b>Anti-Fraud Policy</b>	
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<b>For use by</b>	Trustees, Staff and Volunteers
<b>Purpose</b>	The policies and procedures of Age UK Norfolk against Fraud and other forms of dishonesty
<b>Key related Documents</b>	Disciplinary Policy Whistleblowing Policy
<b>Version</b>	1
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## Introduction

This document sets out the policy and procedures of Age UK Norfolk against fraud and other forms of dishonesty, together with the steps that must be taken where any of these practices is suspected or discovered.

## Policy Statement

Age UK Norfolk will continually strive to ensure that all its financial and administrative processes are carried out and reported honestly, accurately, transparently, and accountably and that all decisions are taken objectively and free of personal interest. We will not condone any behaviour that falls short of these principles.

All members of the organisation have a responsibility for putting these principles into practice and for reporting any breaches they discover.

The Charity will provide clear routes by which concerns can be raised by Trustees, staff, and volunteers and by those outside of the Charity. A copy of the Charity's whistleblowing policy is available to Trustees, staff, volunteers, service users, suppliers and other third parties.

## Who the Policy applies to

The Policy applies to Trustees, staff, and volunteers. Anybody associated with Age UK Norfolk who commits fraud, theft, or any other dishonesty, or who becomes aware of it and does not report it, will be subject to action appropriate to the role which may include dismissal.

Trustees, staff, and volunteers are expected to lead by example in adhering to policies, procedures and practices. Equally, members of the public, service users and external organisations (such as suppliers and contractors) are expected to act with integrity and without intent to commit fraud against the Charity in any dealings they may have with the Charity.

Trustees and Managers are expected to deal promptly, firmly, and fairly with suspicions and/or allegations of fraud or corrupt practice.

## Definitions

- **Fraud:** A deliberate intent to acquire money or goods dishonestly through the falsification of records or documents. The deliberate changing or falsifying of financial statements or other records by either; a member of the public, someone who works or is a volunteer for Age UK Norfolk. The criminal act is the attempt to deceive and attempted fraud is therefore treated as seriously as accomplished fraud
- **Theft:** Dishonestly acquiring, using or disposing of physical or intellectual property belonging to Age UK Norfolk or to individual members of the organisation.
- **Misuse of equipment:** Deliberately misusing materials or equipment belonging to Age UK Norfolk.
- **Abuse of position:** Exploiting a position of trust within the organisation.

## **Responsibilities**

In relation to the prevention of fraud, theft, misuse of equipment and abuse of position, specific responsibilities are as follows:

### **a) Trustees:**

The Trustees are responsible for establishing and maintaining a sound system of internal control that supports the achievement of the Charity's policies, aims and objectives.

The system of internal control is designed to respond to and manage the whole range of risks that the Charity faces.

The system of internal control is reviewed on an on-going basis. The system is designed to identify the current principal risks, to evaluate the nature and extent of those risks and to manage them effectively. Managing fraud and dishonesty risk is seen in the context of the management of this wider range of risks.

### **b) Head of Operations :**

Overall responsibility for managing the risk of fraud has been delegated to the Head of Operations . Their responsibilities include:

- Undertaking a six-monthly review of the fraud risks associated with each of the key organisational activities alongside the manager for that area where appropriate.
- Establishing an effective anti-fraud response plan, in proportion to the level of fraud risk identified.
- The design of an effective control environment to prevent fraud, in conjunction with the management team.
- Establishing appropriate mechanisms for:
  - reporting fraud risk issues
  - reporting significant incidents of fraud or attempted fraud to the Board of Trustees.
  - reporting significant incidents of fraud or attempted fraud to Insurers
- Liaising with the Charity's appointed Auditors.
- Making sure that all staff are aware of the Charity's Anti-Fraud Policy and know what their responsibilities are in relation to combating fraud.
- Provide appropriate anti-fraud training to staff, volunteers and Trustees as requested; and
- Ensuring that appropriate action is taken to minimise the risk of previous frauds occurring in future by completing an investigation, compiling a report and action plan, and ensuring this is shared with and understood by all relevant parties.

### **c) Management Team:**

The Management Team are responsible for:

- Assessing the types of risk involved in the operations for which they are responsible alongside the Head of Operations ;
- Ensuring that an adequate system of internal control exists within areas of responsibility and that these controls operate effectively.
- Preventing and detecting fraud as far and as soon as possible.
- Reviewing the control systems for which they are responsible every six months.
- Ensuring that controls are being complied with by all staff, volunteers and third parties within their area of business.
- Implementing new controls to reduce the risk of similar fraud occurring where frauds have taken place, by ensuring the action plan compiled with the Head of Operations is shared with and understood by all relevant parties.

**d) Staff and Volunteers and Third Parties:**

Trustees, staff, volunteers and third parties are responsible for:

- Conducting themselves in accordance with charities values, policies and procedures.
- Acting with propriety in the use of Charity's resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers.
- Being alert to the possibility that unusual events or transactions could be indicators of fraud.
- Alerting their manager when they believe the opportunity for fraud exists e.g., because of poor procedures or lack of effective oversight.
- Reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events; and
- Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

**Implementation - detection and investigation**

Whilst having regard to the requirements of the General Data Protection Regulations , the Charity actively participates in an exchange of information with external agencies on fraud and corruption. It is often the alertness of Trustees, staff or volunteers and the general public to the possibility of fraud and corruption that leads to detection of financial irregularity.

The Head of Operations must be notified immediately of all financial or accounting irregularities or suspected irregularities or of any circumstances which may suggest the possibility of irregularities including those affecting cash, stores, property, remuneration or allowances.

Reporting of suspected irregularities is essential as it:

- Facilitates, if necessary, a proper investigation by experienced staff, and ensures the consistent treatment of information regarding fraud and corruption.

- When so notified, the Head of Operations will, if necessary, instigate an investigation by appointing a designated officer, auditor or other adviser.
- The designated officer, auditor or other advisor will:
  - Deal promptly with the matter
  - Record evidence received
  - Ensure the security and confidentiality of evidence
  - Work closely with managers of the Charity and other agencies, such as the Police and Courts to ensure that all issues are properly investigated and reported upon.
  - Ensure maximum recoveries are made on behalf of the Charity and assist managers to implement Age UK Norfolk's disciplinary procedures where considered appropriate (referral to the Police will not prohibit or restrict action under the Disciplinary Procedure).
- Malicious accusations may be the subject of disciplinary action.

### **Training**

All staff and volunteers are expected to implement this policy. Any member of staff or volunteer that is unsure of their responsibilities with regard to this policy should alert their line manager who will ensure they are fully appraised on the policy and its implementation.

### **Review**

This policy will be reviewed two-yearly.

## Document Control

<b>Version</b>	<b>Revision</b>	<b>Action</b>	<b>Author</b>	<b>Date</b>
1	1.3	Change of job title to Head of Operations	VA	April 22
1	1.2	Adding and amending sections to strengthen the policy	VA	June 2019
1	1.1	Reviewed and revised	SB	Oct 2016