

Anti-Bribery, Fraud & Corporate Criminal Offences: Policy Statement

1. Introduction

- 1.1 Fraud, bribery and corruption can cause significant damage to organisations. As well as squandering precious resources, they can damage public confidence and negatively impact the morale of staff, volunteers and supporters.
- 1.2 The Trust is committed to the highest standards of ethical behaviour and business practices. We have a zero-tolerance approach to all forms of fraud, bribery, corruption and corporate criminal offences, wherever committed.
- 1.3 We want our people, including staff, volunteers and contractors, to act honestly and with integrity and to look after the resources in their care. We expect them to adhere to our values and to follow our Standards.
- 1.4 However, it is important to recognise that all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. This document sets out how we intend to prevent such situations occurring and to address them when they do occur.

2. Our approach

- 2.1 We will take pro-active, practical steps to prevent fraud and corruption:
 - 2.1.1. We will raise awareness of the risks by providing appropriate training for colleagues & volunteers;
 - 2.1.2. Wherever possible, we will design our systems and procedures to minimise the opportunity for theft, fraud or corruption to occur;
 - 2.1.3. We will investigate any case of suspected fraud, bribery or corruption;



- 2.1.4. We will take disciplinary and/or legal action against those found to have engaged in fraud/corruption, seeking recovery of losses where appropriate;
- 2.1.5. We will promote a culture of openness and accountability, identifying lessons learned from any cases of fraud, bribery or corruption, and implementing appropriate changes;
- 2.1.6. We will monitor and regularly review our anti-fraud and corruption framework;
- 2.1.7. We will encourage staff and volunteers to report reasonably held suspicions in good faith, and will not recriminate against them in the event that their concerns are subsequently found to be unsubstantiated;
- 2.1.8. We will treat the following as disciplinary matters:
- Harassment or victimisation of a person who has raised a concern in good faith;
 - Deliberately deterring others from reporting concerns;
 - Deliberate abuse of this process by maliciously raising allegations against others.

3. Our expectations

3.1 We expect our staff and volunteers:

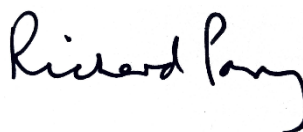
- 3.1.1. Not to profit in any way from their employment with the Trust, apart from their salary and other entitlements;
- 3.1.2. To declare any interests (whether personal interests or those of a family member or close associate) which may prejudice their ability to act honestly and fairly;
- 3.1.3. To be – and be seen to be – honest and incorruptible in their dealings with colleagues, customers, and other stakeholders;
- 3.1.4. Not to accept or offer gifts or hospitality other than in accordance with our Gifts and Hospitality Standard;
- 3.1.5. To report any suspicions they may have of fraud or corruption without delay, either to the Trust's People Director, its Legal & Governance

Director or via the independent whistleblowing provider See, Hear, Speak Up¹.



David Orr CBE

Chair to the Board of Trustees



Richard Parry

Chief Executive

July 2023

¹ See, Hear, Speak Up can be contacted [online](#), via [email](#) or by phone (0800 988 6818)