

# Fraud Policy

Policy & Procedure Number: 75

Date of Board of Trustees' Review: 13<sup>th</sup> May 2021

Next Review Due: 13<sup>th</sup> May 2024

Trust Link: Mr S Robertson

Revision Number: v2

## 1 STATEMENT OF INTENT - FRAUD POLICY

- 1.1 The Wade Deacon Trust requires staff at all times to act honestly and with integrity and to safeguard the public resources for which they are responsible. Fraud is an ever-present threat to those resources and therefore must be a concern to staff. The Trust will not accept any level of fraud and corruption;





## 4 LINE MANAGEMENT RESPONSIBILITY

or, in the event that the allegations of malpractice are to be made against the Company Secretary then report it to the Principal. Staff are required to co-operate fully with any internal checks, reviews or fraud investigations. All staff are required to comply with policies and procedures. Failure to comply may result in disciplinary action.

- 5.2 All employees have the right to 'blow the whistle' on what they perceive to be a cause of serious concern or malpractice. All staff should familiarise themselves with the Trust's Whistleblowing policy and in particular the protection afforded them under the Public Disclosure Act 1998. The Trust Board assures all staff that they will not suffer in any way as a result of reporting reasonably held suspicions.

The Trust subscribes to the seven principles of public life set out in the Nolan Committee's first report, Standards in Public Life.

#### The Seven Principles of Public Life

**Selflessness** - Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

**Integrity** - Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.

**Objectivity** - In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

**Accountability** - Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

**Openness** - Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty - Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership - Holders of public office should promote and support these principles by leadership and example.

## 6 CREATING AN ANTI-FRAUD CULTURE

6.1 The creation of an anti-fraud culture underpins all other work to counter fraud. Staff within the Trust must understand the risk to fraud faced by the organisation, that fraud is serious and that it diverts valuable resources from its primary objective. The Trust recognises the importance of training in the delivery of high quality services and the Trust supports the concept of fraud awareness training for key staff involved with internal control systems.

## 7 DETECTION AND INVESTIGATION

7.1 Where a fraud is detected or suspected, initial responsibility for investigating the matter rests with the Company Secretary who has been nominated as the Trust's Investigating Officer. In their absence, or if the Company Secretary is in any way alleged to be involved in the fraud, responsibility for investigating the matter rests with the Trustee's Representative. The Investigating Officer shall inform and consult with the Principal in all cases except where the Principal is the alleged perpetrator. Investigations will be commenced as soon as possible.

7.2 The appointed internal auditor will be able to offer specialist advice and should be consulted at the relevant time. If it is established that a fraud may have occurred then a comprehensive investigation must be carried out by an experience fraud specialist or referred to the police.

7.3 It is essential that all material that may be of evidential value must be recovered and preserved for further investigation if required. Additionally, the Trust must consider whether to suspend any individual, under the Trust's disciplinary

