Volunteer It Yourself (VIY) Anti-Fraud, Bribery and Corruption Policy

Document	**Anti-Fraud, Bribery and Corruption Policy**
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Introduction

It is important that we are aware of the risk of, and means of enforcing, the rules against fraud, bribery and corruption. This document sets out VIY's policy for detected or suspected fraud, and incorporates best practice within the field regarding counter-fraud measures and takes account of the latest legislation.
NB: This policy supplements our Whistle-blowing Policy.

Definitions

Fraud is theft by deception. It is any deliberate intent to permanently deprive a person or organisation of money or goods through the falsification of any records or documents.

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber.

Corruption is where someone is influenced by bribery, payment or benefit in kind to unreasonably use their position to give some advantage to another.

Theft includes any misappropriation, stealing, malicious damage, and actual or attempted break-in.

We have procedures in place that reduce the likelihood of fraud, bribery or corruption occurring. These include appropriate policies, procedures, rules and regulations, a system of internal financial control and a system of risk assessment. In addition we try to ensure that a risk (and fraud) awareness culture exists in the organisation.

Although the VIY Board holds primary responsibility for preventing fraud, bribery and/or corruption, it is recognised that all our employees, volunteers and other individuals have a part to play in ensuring their efficacy. It is expected that VIY employees at all levels will lead by example in acting with the utmost integrity and ensuring adherence to all relevant regulations, policies and procedures. A culture of openness, honesty and probity is strongly encouraged.

VIY's Policy

VIY is committed to maintaining an honest, open and well-intentioned atmosphere within the organisation. It is therefore also committed to the elimination of any fraud, bribery or corruption and to the rigorous investigation of any such cases.

VIY expects anyone having any reasonable suspicions of fraud, bribery or corruption to report them. It recognises that whilst cases of theft are usually obvious, there may only be a suspicion of fraud, bribery or corruption and thus employees must report any concerns to both their Line Manager and Ed Sellwood, who can then ensure that our procedures are followed.

It is also VIY's policy, which will be rigorously enforced, that no employee will suffer in any way as a result of reporting reasonably held suspicions. All employees can therefore be confident that they will not suffer in any way as a result of reporting, in good faith, reasonably held suspicions of fraud, bribery or corruption.

Roles and responsibilities

This section states the roles and responsibilities of different individuals in reporting fraud, bribery or corruption.

Employees

Employees are expected to act in accordance with our rules regarding Conflicts of Interest as set out in the Employee Handbook. Employees also have a duty to protect the assets of VIY, including information and goodwill as well as property. VIY's policies, procedures, rules and regulations place an obligation on all employees to act in accordance with best practice.

Managers

Managers must be vigilant and ensure that procedures to guard against fraud, bribery and corruption are followed. Managers are expected to establish an anti-fraud culture within their team and ensure that information on procedures is made available to all employees. They should identify the risk of fraud within their regions/teams and consider the adequacy of preventative controls.

Managers should be alert to the possibility that unusual events or transactions could be symptoms of fraud. Where they have any doubt they must seek advice from their immediate manager or Ed Sellwood.

All cases of theft whether of VIY or visitor property, must be reported to Ed Sellwood. Similarly, any case of actual or suspected fraud or corruption must be reported to Ed Sellwood.

Volunteers

Volunteers are subject to the same high standards of accountability as employees and are required to declare and register any interests that might potentially conflict with those of VIY.

If a VIY volunteer has a financial, commercial, personal or other interest, either direct or indirect, in any contract, proposed contract or other matter, and is present at any meeting at which that contract or other matter is the subject of consideration, he or she is required, as soon as practicable after the meeting's commencement, to disclose the fact.

Any interest which any close members of the family of the volunteer may have in these matters shall also be declared when matters or issues are discussed which could affect their financial position.

Reporting fraud, bribery or corruption

This section outlines the action to be taken where fraud, corruption or other illegal acts involving dishonesty, are discovered or suspected. Reporting of all frauds and irregularities is essential to ensure:

- consistent treatment of information;
- proper investigation by an independent and experienced team;
- the optimum protection of VIY's interests.

Any actual or suspected instance of fraud or corruption must be reported to a Line Manager and Ed Sellwood immediately, with copies of any documents which are relevant. It is essential that individuals act at the time of their concerns, as time is likely to be of the utmost importance to prevent further loss to VIY. However, individuals must not confront any individual that they suspect directly, nor must they contact the police directly.

If an employee suspects their Line Manager or Ed Sellwood, the employee should report the suspicions to someone more senior. If the suspicion involves a VIY Board member, the employee should report to another member of the Board.

Police involvement

Where financial impropriety is discovered, VIY's expectation is that the police will be involved. Any referral to the police will not prohibit action being taken under VIY's Disciplinary Policy or Procedure.

Unfounded allegations

All staff receive statutory protection (Public Interest Disclosure Act 1998) where they have disclosed information 'reasonably and responsibly in the public interest'. Staff raising genuine concerns which, following investigation prove unfounded, will be informed of the outcome. Any employee who knowingly discloses false/misleading information or makes malicious allegations, will not be protected by statutory provisions and will be subject to investigation and disciplinary action.

Warning signs

Whilst by no means being proof on their own, the circumstances below may indicate fraud, and should therefore raise suspicions:

- altered documents (correcting fluid, different pen or handwriting);
- claim form details not readily checkable;
- changes in normal patterns, e.g. travel claim details;
- text erratic or difficult to read or with details missing;
- delay in completion or submission of claim forms;
- lack of receipts in support of expense claims, etc;
- employees seemingly living beyond their means;
- employees under constant financial or other stress;
- employees choosing not to take annual leave (and so preventing others becoming involved in their work), especially if solely responsible for a 'risk' area;
- complaints from the public or from employees;
- insistence on dealing with a particular individual

Policy revisions

VIY reserves the right to amend and/or withdraw this policy from time to time for any reason, including without limitation, to take account of changes in the law, best practice and/or operational requirements.
