



## *Anti-Fraud Policy*

### *1. Overview*

This policy covers:

- what is fraud
- The Sanctuary Trust ST approach to fraud
- reporting fraud
- responsibilities
- fraud response plan

### *2. What is fraud?*

The term 'fraud' is commonly used to describe the use of deception to deprive, disadvantage or cause loss to another person or party. This can include theft, the misuse of funds or other resources or more complicated crimes such as false accounting and the supply of false information.

Individuals can be prosecuted under the Fraud Act 2006 if they make a false representation, fail to disclose information or abuse their position.

Some examples of fraud include false travel and subsistence claims, unauthorised changes to supplier bank accounts, sending false invoices for payment.

All fraudulent expenditure is considered to be irregular.

[Read more information in Home Office: fighting fraud together](#)

### *3. ST's approach to fraud*

ST views fraud as an extremely serious matter and is committed to the prevention of fraud and the promotion of a counter-fraud culture. Fraud is an ever-present threat and could harm both the reputation of the Service and the resources that we manage.

ST will investigate all instances of actual, attempted and suspected fraud committed by staff, consultants, suppliers and other third parties and will pursue appropriate action in cases of proven fraud to recover funds and assets lost. This may include, but is not limited to, disciplinary or contractual action, civil or criminal proceedings and referral to professional bodies as appropriate and/or legal action.



## *4. Reporting fraud*

ST encourages employees to report actual, attempted or suspected fraud and/or other forms of illegal activity without fear of reprisal.

Employees must report concerns about actual, attempted or suspected fraud to their manager or to the Director of Finance. If concerns involve the Director of Finance, these should be reported to the Ombudsman. If concerns involve the Ombudsman, these should be reported to the Chair of the local Authority.

The Public Interest Disclosure Act 1998 protects employees who raise concerns about certain matters of public interest in good faith. Staff can obtain free independent advice from the charity [Public Concern at Work](#) and should refer to ST's [whistleblowing policy](#).

## *5. Responsibilities*

[Managing Public Money](#) (Annex 4.9) sets the general responsibilities for public sector organisations in relation to fraud.

The Accounting Officer is responsible for establishing and maintaining a sound system of internal control that supports the achievement of departmental policies, aims and objectives. The system of internal control is designed to respond to and manage the whole range of risks that an organisation faces. The system of internal control is based on an on-going process designed to identify the principal risks, to evaluate the nature and extent of those risks and to manage them effectively.

Managing fraud risk will be seen in the context of the management of this wider range of risks.

Overall responsibility for managing the risk of fraud has been delegated to the Director of Finance.

The Senior Leadership Team is responsible for:

- implementing the anti-fraud policy and fraud response plan commensurate with the fraud risk profile and ensuring all employees are aware of these and know what their responsibilities are in relation to combating fraud;
- ensuring effective controls exist to prevent and detect fraud;
- ensuring arrangements are in place for reporting fraud and that all suspected or alleged fraud is investigated;
- ensuring appropriate action is taken against those who commit fraud or who are implicated in it;
- taking action to recover losses; and
- ensuring appropriate action is taken to minimise the risk of similar frauds occurring in the future.



Line managers are responsible for:

- familiarising themselves with the types of fraud that might occur within their business area;
- identifying the risks of fraud;
- ensuring compliance with internal controls, policies and procedures; and
- reporting any actual, suspected or alleged fraud.

All employees are responsible for:

- acting with regularity and propriety in the use and management of service resources;
- ensuring that ST's reputation and assets are protected against fraud;
- conducting themselves in accordance with ST's policies;
- being alert to the possibility that unusual events or transactions could be indicators of fraud;
- reporting any suspicions of fraudulent activity to their Manager or other nominated person; and
- assisting in the investigation of actual, suspected or alleged fraud, where necessary.

## *6. Fraud response plan*

ST has prepared a fraud response plan that provides a checklist of actions and a guide to follow in the event that fraud is uncovered or suspected. The plan forms part of ST's anti-fraud policy and is available in the e-library. It covers reporting suspicions, securing evidence, preventing further losses, the investigation, recovery and disciplinary action.

## *7. Recording of fraud*

All instances of fraud are recorded in a register. An annual return is submitted to the Management Committee declaring any fraudulent activity that has taken place.