



Anti-Fraud, Bribery & Corruption Policy

Alt Valley Community Trust (AVCT) is committed to developing an anti-fraud culture and keeping the opportunities for fraud, bribery and corruption to the absolute minimum. AVCT will assess the risks of fraud, bribery and corruption, establish processes and controls to minimise these risks, and regularly review the effectiveness of its control systems. AVCT requires all staff to immediately report any incidents or suspicions of fraud, bribery or corruption to an appropriate manager.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery, fraud and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate.

Who is covered by the policy?

This policy applies to all individuals working at all levels, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us on a contract or self-employed basis.

Risk and internal control systems.

AVCT will seek to assess the nature and extent of its exposure to the risks of internal and external fraud, bribery and corruption. It will regularly review these risks, using information on actual or suspected instances of fraud, bribery and corruption to inform its review.

AVCT will seek to put in place efficient and effective systems, procedures and internal controls to: encourage an anti-fraud culture; prevent and detect fraud, bribery and corruption; and reduce the risks to an acceptable level.

AVCT will seek to equip its staff with the skills, knowledge and expertise to manage its fraud risk effectively. It will provide adequate training to make staff aware of the risks of fraud, bribery and corruption, and of their responsibilities in preventing, detecting, and reporting it.

AVCT will make all those receiving funds or representing AVCT including its suppliers, grant recipients, partners, contractors and agents aware of this policy.

AVCT will work with relevant stakeholders, including comparable organisations, relevant regulators and government organizations to tackle fraud.

We will regularly review and evaluate the effectiveness of its systems, procedures and internal controls for managing the risk of fraud. We will do this through risk management and assurance processes and audit arrangements.

Reporting – internal.

All staff must immediately report any suspected or actual instances of fraud, bribery or corruption. This includes offers to pay bribes, solicitation of bribes and demands to make facilitation payments. Failure to report could result in disciplinary action.



Reports should be made to an appropriate manager. If staff are not comfortable reporting their concerns to these people, then they can report it to the Assistant Executive Director, the Chief Executive or a trustee.

AVCT will not penalise anyone for raising a concern in good faith, even if it turns out to be unfounded. Any member of staff who harasses or victimises someone for raising a concern in good faith will themselves be subject to disciplinary action.

AVCT will maintain a system for recording: all reports of actual or suspected fraud, bribery and corruption; the action taken; and the outcome of any investigation. It will use this information to inform its review of the risks and the effectiveness of its controls.

Reporting – external.

AVCT will take all reports of actual or suspected fraud, bribery and corruption seriously, and investigate proportionately and appropriately as set out in this policy.

We will always seek to take disciplinary and/or legal action against those found to have perpetrated or assisted with fraudulent or other improper activities in any of its operations. For staff, this may include dismissal. It will also seek to recover any assets lost through fraud.

Approval of losses.

All losses as the result of fraud must be recorded on the loss register and approved in compliance with the AVCT's delegated authorities. To manage the exposure to bribery and corruption, all gifts and hospitality received by staff must be approved. Conflicts of interest are known to increase the risk of fraud. Therefore, all staff who have an interest in an actual or potential supplier (whether personally, or through family members, close friends or associates) must report that conflict of interest to their manager.

Responsibilities.

The Counter Fraud Team is responsible for recording all instances of actual or suspected fraud, bribery and corruption, ensuring that they are investigated proportionately and appropriately, and reported to external parties. They are also responsible for providing advice and training to staff on preventing, detecting and investigating fraud. This includes investigating cases where specialist input is required due to the complex nature of the case.

Managers receiving reports of fraud, bribery and corruption are responsible for reporting them to the Counter Fraud Team, and agreeing with them how the case will be managed and who will be responsible for investigation.

All staff are responsible for complying with this policy.

Definitions.

Fraud is knowingly making an untrue or misleading representation with the intention of making a gain for oneself or another or causing a loss, or risk of loss, to another.



Bribery is giving or offering someone a financial or other advantage to encourage that person to perform their functions or activities improperly, or to reward someone for having already done so. A facilitation payment is a type of bribe. An example is an unofficial payment or other advantage given to undertake or speed up the performance of their normal duties.

Corruption is the misuse of entrusted power for personal gain. This would include dishonest or fraudulent behaviour by those in positions of power, such as managers. It would include offering, giving and receiving bribes to influence the actions of someone in a position of power or influence, and the diversion of funds for private gain.

A conflict of interest is where an individual has private interests that may or actually do influence the decisions that they make as an employee or representative of an organisation.

Approval and review

Approved by Board of Trustees

Policy author: Danielle Forman

Date Review date: Annually