



Anti-Fraud, Corruption & Bribery Policy

Policy Statement

The Trust is committed to the prevention of fraud, corruption, bribery and any other forms of dishonesty and will promote an anti-fraud, anti-corruption and anti-bribe culture.

The Trust operates a zero-tolerance attitude to fraud, corruption and bribery and requires staff to act honestly and with integrity at all times, and to report all suspicious activities. The Trust will investigate all suspicious activities committed by staff, charities, consultants, suppliers, the ELM and other third parties.

It is the Trust's policy to conduct its business in an honest and ethical manner and expects the ELM to have processes and policies in place to achieve a zero-tolerance approach to fraud, bribery and corruption. The Trust and its staff are committed to acting professionally, fairly and with integrity in all business dealings and relationships.

The Trust will uphold all laws relevant to countering fraud, corruption and bribery in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of conduct at home and abroad.

Fraud, bribery and corruption are punishable for individuals by imprisonment and/or fines. If the Trust is found to have taken part in corruption, the penalties are high. We therefore take our legal responsibilities very seriously.

The Trust operates a zero tolerance approach to fraud, bribery and corruption.

Definitions

Fraud	A deliberate intent to acquire money or goods dishonestly through the falsification of records or documents. The deliberate changing of financial statements or other records by either a member of the public or someone who works for or is a volunteer for the Trust.
Bribery	Is the offering, promising, giving, accepting or soliciting as an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Theft	Dishonestly acquiring, suing or disposing of physical or intellectual property belonging to the Trust or to beneficiaries of the Trust.
Facilitation of payments	Small bribes paid to speed up a service are sometimes called facilitation payments. Some charities work in areas where such payments are the norm in the local culture, often where charitable need is extreme. Notwithstanding the small amounts usually involved, they are still bribery payments. Therefore an unacceptable use of charity funds.

Responsibilities

In relation to the prevention of fraud, theft and abuse of position, specific responsibilities are as follows:

The Trustees	Are responsible for establishing and maintaining a sound system of internal control that supports the achievement of the Trust's policies, aims and objectives. Trustees regularly review the risk register and the policies and procedures in place to respond to those risks.
Head of Charities	<p>The overall responsibility for managing the risk of fraud has been delegated to the Head of Charities, whose responsibilities include:</p> <ul style="list-style-type: none"> • Undertaking a regular review of the fraud risks associated with operation of the External Lottery Manager (ELM) and the Trust's key organisational objectives. • Ensuring there is an effective anti-fraud control and response plan, in proportion to the level of fraud risk identified. • Establishing appropriate mechanisms for: <ul style="list-style-type: none"> ○ Reporting fraud risk issues and significant incidents to the Board of Trustees. ○ Liaising with the Trust's appointed auditors. ○ Ensuring that staff and Trustees are aware of this Policy and what their associated responsibilities are. ○ Ensuring that appropriate training is made available. ○ Ensuring that appropriate action is taken to minimise the risk of previous frauds occurring in future.

Reporting Suspicious

Whilst having regard to the requirements of the Data Protection legislation, the Trust actively participates in an exchange of information with external agencies on fraud, corruption and bribery. It can be the alertness of Trustees, staff or volunteers and the

general public to the possibility of fraud and corruption that leads to detection of financial irregularity.

The Chair of the Board of Trustees must be notified immediately of all financial or accounting irregularities or suspected irregularities or of any circumstances which may suggest the possibility of irregularities including those affecting cash, stores, property, remuneration or allowances.

Response Plan

The Chair for the Board of Trustees will:

- Facilitate a proper investigation by experienced staff, and ensures the consistent treatment of information regarding fraud and corruption.
- When so notified, the Chair will instigate an investigation by appointing a designated officer, auditor or other adviser.
- The designated officer, auditor or other advisor will:
 - Deal promptly with the matter.
 - Record evidence received.
 - Ensure the security and confidentiality of evidence.
 - Work closely with senior managers of the Trust, ELM and other agencies, such as the Police and Courts to ensure that all issues are properly investigated and reported upon.
 - Ensure maximum recoveries are made on behalf of the Trust and assist the senior managers to implement the Trust's disciplinary procedures where considered appropriate (referral to the Police will not prohibit or restrict action under the Disciplinary Procedure).
 - In cases of suspected payroll irregularities where a fraud investigation may be possible, discussion will occur between the Chair and the CEO if it is thought a disciplinary investigation is more appropriate.
 - Communicate to relevant staff that malicious accusations may be the subject of disciplinary action.

Review

This policy will be reviewed and approved by Trustees on an annual basis.

Additional Guidance:

The Gambling Commission Governance Framework Anti-Fraud and Corruption Policy - [Click here](#)