



Anti-Fraud, Bribery, and Corruption Policy

1. Introduction

1.1. Age UK Lancashire adheres to the Fraud Act 2006, Bribery Act 2010, and other relevant regulations. Safeguarding the assets of this organisation is everyone's responsibility.

1.2. Accountability for oversight of financial governance sits with our trustees. Responsibility for financial assurance sits with the CEO and finance team. The Finance and Resources Committee (FARC) is the group within our organisation that ensures appropriate diligence, monitoring and reporting.

1.3. Age UK Lancashire is committed to conducting business fairly, transparently, and ethically.

1.4. A bribe is an inducement for gaining an advantage. If unsure, contact your line manager immediately.

2. Purpose

2.1. This policy outlines Age UK Lancashire's stance on fraud, bribery, and corruption, focusing on prevention, detection, reporting, and investigation. Including legal consequences and third-party engagement.

3. Scope

3.1. This policy applies to Age UK Lancashire and Age UK Lancashire Trading Ltd.

3.2. It is mandatory for all staff, volunteers, students, consultants, and contractors. Violations may result in disciplinary action, including dismissal.

4. Policy Statement

4.1. Zero Tolerance:

- No tolerance for fraud, bribery, or corruption.
- Disciplinary/legal actions will be pursued against offenders.

4.2. All individuals must act honestly and safeguard resources.

4.3. Compliance with all applicable laws, including the Bribery Act 2010, is required.

4.4. Age UK Lancashire will always seek to take disciplinary and/or legal action against those found to have perpetrated, be involved in, or assisted with fraudulent or other improper activities in any of its operations.

5. Risk and Internal Control Systems

5.1. Age UK Lancashire will assess its risk exposure and review suspected fraud cases to improve internal controls.

5.2. Anti-fraud measures, training, and controls are undertaken to prevent, detect, and manage fraud risks. These include but are not limited to:

- Compliance with our Financial Authorisation Matrix
- Our process for 2 SMT members to authorise bank payments
- Segregation of duties, i.e. our Director of Finance cannot authorise payments on our banking system.
- Internal and external Audit
- Finance and Risk committee review of the latest management accounts and regular cash and investment updates.
- Procurement policy
- Payroll audit

5.3. Suppliers, contractors, grant recipients, partners, and agents will be informed of this policy.

5.4. Regular evaluations of anti-fraud procedures will occur through audits and reviews.

6. Internal Reporting

6.1. Suspected fraud, bribery, or corruption must be immediately reported to a Director or Trustee. Failure to report could result in disciplinary action.

6.2. Third parties (suppliers, contractors, etc.) must report any suspected or actual fraud involving Age UK Lancashire to a Director or Trustee of Age UK Lancashire.

6.3. No penalties will be imposed on individuals raising concerns in good faith.

7. External Reporting

7.1. Obligations to report fraud, bribery, and corruption to external parties will be fulfilled.

8. Investigation

8.1. All reports of fraud, bribery, and corruption will be taken seriously and investigated proportionately.

8.2. Disciplinary and legal action will be pursued against those involved, including recovery of lost assets. For staff this may include dismissal.

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9. Specific Risk Mitigation Measures

9.1. Gifts and hospitality are managed in line with the **Gifts, Donations, Wills, and Bequests Policy**.

9.2. Conflicts of interest must be reported to your manager as they are known to increase fraud risks. Therefore, staff who have an interest in an actual or potential supplier (whether personally, or through family members, close friends or associates) must report that.

10. Responsibilities

10.1. The Senior Management Team must ensure awareness and enforcement of this policy.

10.2. All staff, volunteers, and students must comply with this policy.

11. Definitions

11.1. **Fraud**: Intentional deception for gain or causing loss to others.

11.2. **Bribery**: Offering or accepting incentives for improper actions.

11.3. **Facilitation Payment**: Unofficial payments to speed up routine actions. This is a type of bribe.

11.4. **Corruption**: Misuse of power for personal gain.

11.5. **Conflict of Interest**: Personal interests affecting professional decisions.

11.6. **Above is a list of simplified definitions. Age UK Lancashire will apply the policy in accordance with the full definitions in the relevant legislation.**

11.7. The fraudulent misuse of property or equipment belonging to Age UK Lancashire which includes: Buildings; Equipment; Copyright; Using Research or documents belonging to the charity, or reproducing any information for own use is corrupt practice and may lead to legal redress.

12. Who is covered by the policy?

12.1. This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as workers in this policy).

13. Gifts and Hospitality

13.1. Normal and appropriate hospitality is allowed (given and received) to or from third parties, but gifts must be authorised.

13.2. Workers must not accept or offer gifts that could suggest a business advantage is expected. The intention behind a gift should always be considered and the test to apply is if the gift or hospitality is reasonable and justifiable.

14. Facilitation Payments and Kickbacks

14.1. No facilitation payments or kickbacks are allowed.

15. Donations

15.1. No contributions to political parties must be made.

15.2. No charitable donations must be made. No donation must be offered or made without the prior approval of a Trustee or Director in line with the authority matrix.

16. Record-Keeping

16.1. Accurate records must be maintained for all payments to third parties.

16.2. All hospitality and gifts must be declared and recorded for managerial review.

16.3. All expenses claimed must be in line with our expenses policy and specifically record the reason for the expenditure.

17. Employee Responsibilities

17.1. All workers must comply with the policy and avoid any activity leading to a policy breach.

17.2. Notify your managers as soon as possible if you believe or suspect a conflict with this policy has occurred, or may occur in the future.

17.3. Violations will result in disciplinary actions, including dismissal.

18. Raising Concerns

18.1. Workers are required to report concerns about bribery or corruption at the earliest possible opportunity following the **Whistleblowing Policy**.

19. Victim of Bribery

19.1. Any instances of being offered or asked for a bribe must be reported to your line manager immediately.

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20. Employee Protection

20.1. Workers will be supported for refusing bribes or raising concerns in good faith, with protection from detrimental treatment.

21. Training and Communication

21.1. Training on the policy will be provided during induction and as necessary.

21.2. Zero-tolerance to bribery and corruption must be communicated to all stakeholders.

22. Breach of Policy

22.1. Breaches will lead to disciplinary action or termination of contracts with third parties.

23. Potential Risk Scenarios (Red Flags)

23.1. Red flags indicating potential bribery or corruption must be reported to management immediately. This may include the following though this list is not exhaustive. A third party may be internal or external to our organisation.

- (a) you become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- (b) you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;
- (c) a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- (d) a third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- (e) a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- (f) a third party requests an unexpected additional fee or commission to "facilitate" a service;
- (g) a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- (h) a third party requests that a payment is made to "overlook" potential legal violations;
- (i) a third party requests that you provide employment or some other advantage to a friend or relative;

- (j) you receive an invoice from a third party that appears to be non-standard or customised;
- (k) a third party insists on the use of side letters or refuses to put terms agreed in writing;
- (l) you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- (m) a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us; and
- (n) you are offered an unusually generous gift or offered lavish hospitality by a third party.

24. Policy Responsibility

24.1. Trustees hold overall responsibility for policy compliance.

24.2. The Chief Executive is responsible for day-to-day implementation and monitoring.

24.3. This policy does not form any part of the employee's contract of employment and it may be amended at any time.

ADOPTION OF THIS POLICY BY THE BOARD OF TRUSTEES

Victoria Buyer, Age UK Lancashire Chair

Signature:



Date: 21st November 2024