

ANTI-FRAUD POLICY

Version: 30th May 2025

| ANTI-FRAUD POLICY | |
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| Author | Jasmine Toombs, Head of Corporate Services |
| Division | Senior Management Team |
| For use by | Trustees, Staff and Volunteers |
| Purpose | To set out the anti-fraud policy and procedures of the Charity |
| Key related Documents | Disciplinary Policy Whistleblowing Policy |
| Version | 30 th May 2025 |
| Approval Date | SMT 18 th June 2025 |
| Review Date | Q2 2027 / 2028 |

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| DOCUMENT CONTROL | | | |
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| DATE | EDITS | EDITOR / REVIEWER | CHANGE CONTROLLER / DOCUMENT OWNER |
| Oct 2016 | Reviewed and revised | Stephen Branch Director of Finance | Stephen Branch Director of Finance |
| June 2019 | Adding and amending sections to strengthen the policy | Vicky Aitken Head of Operations | Vicky Aitken Head of Operations |
| April 2022 | Change of job title to Head of Operations | Vicky Aitken Head of Operations | Vicky Aitken Head of Operations |
| March 2025 | Reformatting & revision | J Toombs Head of Corporate Services | J Toombs Head of Corporate Services |
| March 2025 | Review of draft | Ann Donkin Chief Executive | J Toombs Head of Corporate Services |
| 29 th May 2025 | Reviewed – no changes | J Toombs Head of Corporate Services | A Donkin, Chief Executive |
| 30 th May 2025 | Final review and <i>EDITOR</i> check | A Donkin, Chief Executive | A Donkin, Chief Executive |

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Definitions

- **Fraud:** A deliberate intent to acquire money or goods dishonestly through the falsification of records or documents. The deliberate changing or falsifying of financial statements or other records by either; a member of the public, someone who works or is a volunteer for Age UK Norfolk. The criminal act is the attempt to deceive, and attempted fraud is therefore treated as seriously as accomplished fraud
- **Theft:** Dishonestly acquiring, using or disposing of physical or intellectual property belonging to Age UK Norfolk or to individual members of the organisation.
- **Misuse of equipment:** Deliberately misusing materials or equipment belonging to Age UK Norfolk.
- **Abuse of position:** Exploiting a position of trust within the organisation.

1. Responsibilities

- 1.1 The overall responsibility for decisions made, and for the governance of Age UK Norfolk lies with its Trustees. In exercising this responsibility, the Trustees, as the voting members of the BoT, are required to reflect the requirements of the law, the organisation's governing documents and the standards set by Age UK. The legal obligations are contained in the Charities Acts 2021 & 2022 and the accounting and reporting requirements are set out in the Charities Statement of Recommended Practice (SORP). As Age Concern Norfolk, operating as Age UK Norfolk, is a charitable company limited by guarantee, the financial liability of the members, who include the Trustees, is limited to £1 each. This limitation applies only where the Trustees can be shown to have acted within the legal and regulatory framework.
- 1.2 Role of Head of Corporate Services
Responsibility for managing the risk of fraud has been delegated to the Head of Corporate Services. Their responsibilities include:
 - undertaking a six-monthly review of the fraud risks associated with each of the key organisational activities alongside the manager for that area where appropriate
 - maintaining an effective anti-fraud response plan, in proportion to the level of fraud risk identified
 - ensuring appropriate mechanisms for:
 - reporting fraud risk issues
 - reporting significant incidents of fraud or attempted fraud to the Board of Trustees
 - reporting significant incidents of fraud or attempted fraud to Insurers
 - liaising with the Charity's appointed Auditors.

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1.3 Role of Senior Management Team

The Senior Management Team is responsible for:

- assessing and reviewing the types of risk involved in the operations for which they are responsible alongside the Head of Corporate Services;
- ensuring that an adequate system of internal control exists within areas of responsibility and that these controls operate effectively.
- preventing and detecting fraud as far and as soon as possible.
- ensuring that controls are being complied with by all staff, volunteers and third parties within their area of business.
- implementing new controls to reduce the risk of similar fraud occurring where frauds have taken place, by ensuring the action plan compiled with the Head of Corporate Services is shared with and understood by all relevant parties.

1.4 Staff and Volunteers and Third Parties

Trustees, staff, volunteers and third parties are responsible for:

- conducting themselves in accordance with charities values, policies and procedures
- acting with propriety in the use of Charity's resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers
- being alert to the possibility that unusual events or transactions could be indicators of fraud
- alerting their manager when they believe the opportunity for fraud exists e.g. because of poor procedures or lack of effective oversight
- reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events
- cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

2. **Implementation - detection and investigation**

Whilst having regard to the requirements of the General Data Protection Regulations, the Charity actively participates in an exchange of information with external agencies on fraud and corruption. It is often 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 Head of Corporate Services must be notified immediately of all financial or accounting irregularities or suspected irregularities or of any circumstances which

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may suggest the possibility of irregularities including those affecting cash, stores, property, remuneration or allowances.

Reporting of suspected irregularities is essential as it:

- facilitates, if necessary, a proper investigation by experienced staff, and ensures the consistent treatment of information regarding fraud and corruption
- when so notified, the Head of Corporate Services will, if necessary, 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 managers of the Charity 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 Charity and assist managers to implement Age UK Norfolk's disciplinary procedures where considered appropriate (referral to the Police will not prohibit or restrict action under the Disciplinary Procedure).

Malicious accusations may be the subject of disciplinary action.

3. Training

All staff and volunteers are expected to implement this policy. Any member of staff or volunteer that is unsure of their responsibilities with regard to this policy should alert their line manager who will ensure they are fully appraised on the policy and its implementation. Further information and support is available from the following organisations:

www.actionfraud.police.uk/charities

www.gov.uk/government/publications/internal-financial-controls-for-charities-cc8/protect-your-charity-from-fraud

4. Review

This policy will be reviewed two-yearly.