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Policy summary

Triple A has a ‘zero tolerance’ policy towards fraud, bribery and corruption. It will always seek to take disciplinary and/or legal action against those found to have perpetrated fraud. Triple A is committed to developing an anti-fraud culture and keeping the opportunities for fraud, bribery and corruption to the absolute minimum. Triple A 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. Triple A requires all staff to immediately report any incidents or suspicions of fraud, bribery or corruption to an appropriate manager or another person named in Raising Concerns. Triple A will not penalise anyone for raising a concern in good faith. They will take all reports of fraud, bribery and corruption seriously, and investigate proportionately and appropriately as set out in the Fraud Response Plan. Triple A requires all those receiving Triple A funds or representing the charity including its suppliers, grant recipients, partners, contractors and agents, to act in accordance with this policy. This includes reporting to the any suspected or actual instances of fraud, bribery or corruption involving Triple A assets or staff.

Introduction

Triple A complies with applicable legislation, including the Fraud Act 2006, the Bribery Act 2010, and with other regulatory requirements and applicable guidance including Managing Public Money. Its trustees are required under charity law to safeguard the assets of the charity. Triple A is committed to conducting business fairly, openly and honestly and in accordance with the highest ethical and legal standards. The purpose of this policy is to set out the charities stance on fraud, bribery and corruption and its

approach to preventing, detecting, reporting and investigating fraud, bribery and corruption. This policy is applicable to, and must be followed by, all staff including consultants and contractors. Failure to comply could result in disciplinary action, including dismissal. Triple A requires all those receiving charity funds or representing Triple A, including its suppliers, grant recipients, partners, contractors and agents, to act in accordance with this policy.

POLICY

Policy Statement

Triple A has a 'zero tolerance' policy towards fraud, bribery and corruption. This means that Triple A a) does not accept any level of fraud, bribery or corruption within the organisation or by any other individual or organisation receiving charity funds or representing the charity; and b) 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. Triple A is committed to developing an anti-fraud culture and keeping the opportunities for fraud, bribery and corruption to the absolute minimum. The charity requires all staff to act honestly and with integrity at all times and to safeguard the resources for which they are responsible.

Risk and internal control systems

Triple A 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. The charity 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. Triple A 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. Triple A will make all those receiving charity funds or representing the charity, including its suppliers, grant recipients, partners, contractors and agents aware of this policy. The charity will work with relevant stakeholders, including comparable organisations, relevant regulators and government organizations to tackle fraud. Triple A will regularly review and evaluate the effectiveness of its systems, procedures and internal controls for managing the risk of fraud. It 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, Raising Concerns sets out who else staff can report to. The charity also requires all those receiving Triple A funds or representing Triple A including its suppliers, grant recipients, partners, contractors and agents, to report to any suspected or actual instances of fraud, bribery or corruption involving Triple A assets or staff. Reports should be made to the CEO. Triple A 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. Triple A 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

Triple A will fully meet its obligations to report fraud, bribery and corruption to third parties. The Fraud Response Plan sets out: the parties that suspected or actual fraud, bribery or corruption must be reported to; the nature and timing of the disclosure required; and who is responsible for making the report. Triple A will take all reports of actual or suspected fraud, bribery and corruption seriously, and investigate proportionately and appropriately as set out in this policy and the Fraud Response Plan. The Fraud Response Plan sets out responsibilities for investigating fraud, bribery and corruption, the procedures for investigating, action to be taken and external reporting. Triple A 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. All losses as the result of fraud must be recorded on the loss register. To manage the exposure to bribery and corruption, all gifts and hospitality received by staff and given to Public Officials must be approved in line with the delegated authorities and recorded in line with the Gifts and Hospitality policy. 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.

Triple A operations manager is responsible for overseeing reports of fraud and for their management and action thereof.

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 a public official 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 or government officials. 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.

Fraud Response Plan

1. Immediate Containment

- **Stop further loss:** Suspend relevant accounts, freeze transactions, and secure physical assets.
- **Preserve evidence:** Keep all documents, emails, CCTV, and digital logs intact – do not alter or delete anything.
- **Limit access:** Restrict system and premises access for individuals under investigation.

2. Internal Notification

- Inform the **Chair of Trustees** and **Senior Management** immediately.
- If your charity has a **designated fraud officer**, alert them first.
- Maintain confidentiality – only those who need to know should be informed.

3. External Reporting

- **Action Fraud** (UK's national fraud reporting centre) – obtain a crime reference number.
- **Charity Commission** – report serious incidents promptly.
- **Bank or payment provider** – to block suspicious transactions.
- **Insurers** – if your policy covers fraud losses.

4. Investigation Process

- Any suspicion of fraud should be reported to the Operations manager who will assess and report to Police/action fraud

5. Communication Management

- Prepare a **controlled statement** for staff, volunteers, and stakeholders.
- Avoid public disclosure until facts are confirmed – protect both the charity's reputation and the investigation's integrity.

6. Recovery & Remediation

- Seek legal advice on recovering stolen funds or assets.
- Strengthen internal controls to prevent recurrence (e.g., dual authorisation, regular audits).
- Provide fraud awareness training for staff and volunteers.

7. Post-Incident Review

- Document lessons learned.
- Update your **Anti-Fraud Policy**
- Report outcomes to trustees and, where appropriate, to members or donors.

Fraud Prevention Plan

Internal Financial Controls

Segregation of duties – Triple A will ensure that no single person has control over an entire transaction process

Dual Authorisation – Two signatures are required for significant payments set by trustees

Due diligence on payments – Bank details for payments (e.g BACS) will be confirmed against a physical bank statement before making payments, especially for new suppliers

Thorough recruitment checks – Triple A will perform basic screening, including identity verification and reference checks for new staff and volunteers.

Foster a strong ethical culture -Triple A will ensure Trustees and senior staff follow all financial rules encouraging an environment where staff feel safe to report concerns without fear.

Provide regular training – Triple A will ensure all personnel are aware of fraud risks, common types of fraud

Protect against cybercrime – Triple A will utilise free resources and implement basic protective measures such as strong passwords and cyber awareness training.

