



Anti-fraud, bribery and corruption policy for Get up and Grow



Get Up And Grow

Anti-fraud, bribery and corruption policy

Policy summary

Get Up and Grow (GUAG) has a 'zero tolerance' stance towards fraud, bribery and corruption. It will always seek to take disciplinary and/or legal action against those found to have perpetrated fraud.

GUAG is committed to developing an anti-fraud culture and to keeping the opportunities for fraud, bribery and corruption to the absolute minimum. GUAG will assess the risks of fraud, bribery and corruption, establish processes and controls to minimise these risks, and it will regularly review the effectiveness of its control systems.

The Directors requires all staff and volunteers to report immediately any incidents or suspicions of fraud, bribery or corruption to an appropriate manager or another person.

The Directors will not penalise anyone for raising a concern in good faith.

The Directors will take all reports of fraud, bribery and corruption seriously, and investigate them proportionately and appropriately.

The Directors require all those receiving GUAG funds or representing GUAG, including its suppliers, grant recipients, partners, contractors, volunteers and agents, to act in accordance with this policy. This includes reporting to GUAG any suspected or actual instances of fraud, bribery or corruption involving GUAG assets, its staff or volunteers.

Introduction

GUAG complies with applicable legislation, including the Fraud Act 2006, the Bribery Act 2010 and with other regulatory requirements. GUAG is committed to conducting itself fairly, openly and honestly and in accordance with the highest ethical and legal standards.

Purpose

The purpose of this policy is to set out the GUAG's stance on fraud, bribery and corruption and its approach to preventing, detecting, reporting and investigating fraud, bribery and corruption.

Scope

This policy is applicable to, and must be followed by, all staff and volunteers including consultants and contractors. Failure to comply could result in disciplinary and/or legal action, including dismissal. GUAG requires all those receiving GUAG funds or representing GUAG, including its suppliers, grant recipients, partners, contractors, volunteers and agents to act in accordance with this policy.

Policy Statement

GUAG has a 'zero tolerance' stance towards fraud, bribery and corruption. This means that GUAG:

- a) does not accept any level of fraud, bribery or corruption within the organisation or by any other individual or organisation receiving the GUAG's funds or representing GUAG; 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.

GUAG is committed to developing an anti-fraud culture and keeping the opportunities for fraud, bribery and corruption to the absolute minimum. Staff and volunteers are encouraged to raise any suspicion or concern, however small or immaterial this may seem. GUAG requires all staff and volunteers to act honestly and with integrity to safeguard the resources and reputation of GUAG at all times.

Risk and internal control systems

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

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

When appropriate, the Trust will work with relevant stakeholders, including comparable organisations, relevant regulators and government organisations to tackle fraud.

The Trust 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 a Director, who will inform a second Director. The two Directors will decide on the appropriate course of action to be taken with regard to further reporting, taking into account this Policy.

The GUAG also requires all those receiving GUAG funds or representing GUAG, including its suppliers, grant recipients, partners, contractors, volunteers and agents to report any suspected or actual instances of fraud, bribery or corruption involving, without limitation, GUAG's assets or staff or volunteers.

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

GUAG 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

GUAG will fully meet its obligations to report fraud, bribery and corruption to third parties.

Investigation

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

GUAG 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.

Responsibilities

All staff and volunteers 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 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.

Public Official means any person in public office.

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on:

Signed: 

Date: 01.04.2024

This policy will next be reviewed on 01.04.2025