

## **ANTI-FRAUD POLICY**

The Trustees and staff of the James Percy Foundation (the “Charity”) are committed to fulfilling their responsibility to protect the Charity against fraud, theft and corruption.

The Charity will continually strive to ensure that its financial, contractual and administrative processes are conducted and reported honestly, accurately, and transparently and that all decisions are taken objectively and free from personal interest. The Charity will not condone any behaviour that falls short of these principles.

The Trustees and staff are expected to adhere to the Charity’s policies, procedures and practices (including the Charity’s Trustee Expenses Policy, the Code of Conduct, the Budget and Treasury Policy and the Conflict of Interests Policy). Equally members of the public and external organisations, such as grantees, suppliers and contractors, are expected to act with integrity and without intent to commit fraud against the Charity.

### **Trustees’ responsibilities**

In order to prevent fraud, theft and corruption the Trustees are responsible for:

- establishing and maintaining a sound system of internal control (outlined in the Charity’s policies) to respond to, and manage, all risks faced by the Charity.
- regularly reviewing the risks of internal and external fraud, theft and corruption, identifying, and implementing steps to mitigate any risks identified.
- acting with propriety in the use of the Charity’s resources and the handling and use of its funds. This includes ensuring that payments are made in accordance with the Charity’s Budget and Treasury Policy.
- ensuring that grants are awarded in accordance with the Charity’s grant-selection policy (including completion of due diligence and other checks of potential partners).
- being alert to the possibility that unusual events, messages or transactions could be indicators of fraud.
- taking all appropriate steps to protect computers and accounts with service providers that are used for charity business.
- notifying the other Trustees if they become aware of, or suspect fraud. The Charity will not penalise anyone for raising a concern in good faith, even if it turns out to be unfounded.
- dealing with any instances of fraud or suspected fraud promptly and appropriately, recording all evidence received and making the relevant disclosures to the appropriate bodies / authorities (including the police and the Charity Commission).
- maintaining a record of all reports of actual or suspected fraud, theft and corruption, the action taken and the outcome of any investigation.

- ensuring that the Charity fully complies with its obligations to report fraud, theft and corruption to third parties.

### **Applicants/Grantees**

In all matters relating to grant awards, payments and grant management, the Charity expects that all information provided by applicants/grantees is given in good faith, with due care and attention and, that it is, to the best of the applicant's/grantee's knowledge, accurate. This applies to information given in writing, over the telephone or during a field visit (including in project proposals, in response to the due diligence questionnaire, progress reports, by email and in all other correspondence with us).

Grantees are required to notify the Charity immediately of all incidences of fraud or attempted fraud relating to the grant awarded by the Charity.

The discovery that any information has been provided fraudulently or not in good faith is likely to result in a grant not being awarded, or a grant which has been awarded being cancelled and the appropriate disclosures made. Where payments have already been made it is likely that the Charity will require the return of funds.

### **Staff**

Every member of staff is responsible for :

- acting with propriety in the use of the Charity's resources and the handling and use of its funds.
- Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty and leadership;
- 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; and
- cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

### **Publication and review**

This policy will be published on the Charity's website and reviewed on an annual basis.