

Anti-Fraud Policy

1. <u>Introduction</u>

This document sets out the policy and procedures of The Dream Centre against fraud and other forms of dishonesty.

It applies to Directors and staff. Anybody associated with The Dream Centre who commits fraud, theft or any other dishonesty, or who becomes aware of it and does not report it, will be subject to appropriate disciplinary action.

2. <u>Statement of intent</u>

The Dream Centre will continually strive to ensure that all its financial and administrative processes are carried out and reported honestly, accurately, transparently and accountably and that all decisions are taken objectively and free of personal interest. We will not condone any behaviour that falls short of these principles.

All members of The Dream Centre have a responsibility for putting these principles into practice and for reporting any breaches they discover.

3. <u>Definitions</u>

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

4. Culture

Directors, staff and volunteers are expected to lead by example in adhering to policies, procedures and practices. Equally, members of the public, service users and external organisations(such as suppliers and contractors) are expected to act with integrity and without intent to commit fraud against the company.

As part of this, The Dream Centre will provide clear routes by which concerns may be raised by Directors and staff.

are expected to deal promptly, firmly and fairly with suspicions and allegations of fraud or corrupt practice

5. Responsibilities

In relation to the prevention of fraud, theft, misuse of equipment and abuse of position, specific responsibilities are as follows:

Overall responsibility for managing the risk of fraud has been delegated to the Director.

Their responsibilities include:

- Undertaking a regular review of the fraud risks associated with each of the key organisational objectives.
- Establishing an effective anti-fraud response plan, in proportion to the level of fraud risk identified.
- The design of an effective control environment to prevent fraud.
- Establishing appropriate mechanisms for:
 - o reporting fraud risk issues
 - reporting significant incidents of fraud or attempted fraud to the Board of Director
 Directors;
- Making sure that all staff are aware of the companies Anti-Fraud Policy and know what their responsibilities are in relation to combating fraud;
- Ensuring that appropriate anti-fraud training is made available to Directors, and staff as required; and
- Ensuring that appropriate action is taken to minimise the risk of previous frauds occurring in future.

<u>Staff</u>

Every member of staff is responsible for:

- Acting with propriety in the use of Company's resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers;
- 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.

Review

This policy will be reviewed on an annual basis.