



Anti-Fraud Policy September 2023-2024	
<b>AIM:</b>	To provide clear direction to staff and others about expected codes of behaviour in dealing with potential fraud and corruption.
<b>NAMED STAFF/PERSONNEL WITH SPECIFIC RESPONSIBILITY FOR ANTI FRAUD</b>	<ul style="list-style-type: none"><li>• <b>Lead</b> – Anita McGreevy</li><li>• <b>Deputies</b> – Lauren Breakell</li><li>• <b>Nominated Trustee</b> – Bill Adams</li></ul>
<b>DISTRIBUTION:</b>	<ul style="list-style-type: none"><li>• CWP staff, volunteers and learners</li><li>• Service users</li><li>• Website</li></ul>
<b>DATE FOR IMPLEMENTATION:</b>	1 <sup>st</sup> September 2023
<b>DATE OF NEXT REVIEW:</b>	31 <sup>st</sup> August 2024
<b>AUTHOR:</b>	Anita McGreevy – Compliance and Operations Manager
<b>APPROVED BY:</b>	Paul Wallace –Vice Chair of Trustees

## Anti-Fraud Policy

### Introduction

Creativity Works Preston is committed to maintaining the highest standards and procedures to prevent fraud and corruption.

This applies to Trustees, staff, trainees and volunteers who are expected to share this commitment.

### The objective of this policy is to:

- promote a culture which deters fraudulent activity
- facilitate the prevention and detection of fraud
- facilitate the implementation of timely and appropriate procedures that aid in the investigation of fraud and related offences

Procedures and policies are in place for the disclosure of situations of conflict of interests, specifically within Finance Procedures.

The term 'fraud' is commonly used to describe a wide range of misconducts including but not exhaustively:

- Theft
- Corruption
- Embezzlement
- Bribery
- Forgery
- Misrepresentation
- Collusion
- Money laundering and concealment of material facts.

It often involves the use of deception to make personal gain for oneself, a connected person or a third party, or a loss for another; intention is the key element that distinguishes fraud from irregularity.

Fraud does not just have a potential financial impact, but it can cause damage to the reputation of CWP and its capacity for managing funds effectively and efficiently.

Corruption is the abuse of power for private gain. Conflict of interests exists where the impartial and objective exercise of the official functions of a person are compromised for various reasons including;

- involving family
- emotional life
- political
- national affinity
- economic interest
- any other shared interest.

## Anti-Fraud Policy

As a small organisation CWP recognise that a lot of power can rest in the hands of specific individual/s for example, the CEO.

Within CWP the overall responsibility for managing the risk of fraud and corruption has been delegated to Complain and Operations Manager, Anita McGreevy who has the responsibility for:

- undertaking a regular review of the fraud risk
- establishing an effective anti-fraud policy and fraud response plan
- ensuring fraud awareness for staff and implementing training
- ensuring that issues are promptly referred to the Board of Trustees

CWP Trustees will carry out a rigorous and prompt review into all cases of suspected and actual fraud which have occurred with a view to improve the internal management and control system where necessary.