



ANTI-FRAUD AND ANTI-CORRUPTION POLICY



This policy applies to trustees, staff/volunteers and volunteers.

1. Introduction

OCHL expects directors and employees / volunteers at all levels (including temporary and agency workers) to adopt the highest standards of propriety and accountability. This procedure is non-contractual and sets out the steps we are taking to combat fraud and corruption in line with the UK Bribery Act 2010 and Fraud Act 2006.

Fraud is defined as: “The intentional distortion of financial statements or other records by persons internal or external to the OCHL which is carried out to conceal the misappropriation of assets or otherwise for gain”.

In addition, fraud can also be defined as: “The intentional distortion of financial statements or other records by persons internal or external to the OCHL which is carried out to mislead or misrepresent”.

Corruption is defined as: “The offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person”. In addition, “the failure to disclose an interest in order to gain financial or other pecuniary gain”.

2. Receiving of gifts

We recognise that sometimes people connected with OCHL will wish to say thank you to individuals. Any small gifts or hospitality to the individual value of £15 need not be declared, although we would encourage all staff / volunteers to inform their manager. If gifts or hospitality to the value of £30 or over are received in any 6 month period these should be declared using the form at the end of this policy.

Where you feel uncomfortable receiving a gift you should politely decline.

You should avoid receiving hospitality or gifts from our suppliers wherever possible. On occasion these arrive without prior knowledge. Please inform your manager who will make a judgement about what to do with such a gift – if of a small value (less than £15), this will be shared across the team if possible. If of a value more than £15 the manager will decide what to do and declare this on the form at the end of this policy.

3. Reporting allegations of fraud or corruption

Concerns must be raised when employees / volunteers reasonably believe that one or more of the following has occurred, is in the process of occurring, or is likely to occur:

- A criminal offence
- A failure to comply with a statutory or legal obligation
- Improper authorised use of funds
- Deliberate concealment of or complicity in any of the above.

Any allegations received in any way, including by anonymous letters or phone calls, will be taken seriously and investigated in an appropriate manner.

We will deal firmly with those who defraud OCHL, or who are corrupt, or where there has been financial malpractice. There is, of course, a need to ensure that any investigation process is not misused and therefore any abuse may be dealt with as a disciplinary matter (for example, employees / volunteers raising malicious allegations).

If fraud or corruption has occurred partly or wholly as a result of a breakdown in our systems or procedures, we will ensure that appropriate improvements in systems of control are implemented to prevent a reoccurrence.

4. The role of managers

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Managers at all levels are responsible for the communication and implementation of this policy in their work area. They are also responsible for ensuring that their employees / volunteers are aware of our Financial Regulations and that the requirements of each are being met in their everyday business activities.

Managers are expected to strive to create an environment in which their staff / volunteers feel able to approach them with any concerns they may have about suspected irregularities. Managers are responsible for initially following up any allegation of fraud or corruption received and will:

- Deal promptly with the matter
- Report the matter to the Management Team
- Obtain advice from Management Team who will arrange for an appropriate investigation to be carried out
- Record all the evidence received
- Ensure that evidence is sound and adequately supported
- Contact other agencies, for example the police, when necessary
- Notify our insurers where appropriate
- Implement our disciplinary procedures when appropriate.

5. Responsibilities of employees / volunteers / volunteers

Employees / volunteers are responsible for ensuring that they follow the instructions given to them by their manager particularly in relation to the safekeeping of the assets of OCHL.

Employees / volunteers are expected always to be aware of the possibility that fraud, corruption or theft may exist in the workplace and to share their concerns with their manager. However, should they prefer (perhaps because the manager is unavailable or indeed might be the cause of the concern) then they should contact the Management Team.

If employees / volunteers still feel unable to raise their concerns through any of the above internal routes then they may wish to raise them through Public Concern at Work a registered charity whose services are free and strictly confidential. They can be contacted on 0207 404 6609 and at <http://www.pcaw.org.uk>

We recognise that a key preventative measure in dealing with fraud and corruption is to take effective steps at the recruitment stage to establish as far as possible, the honesty and integrity of potential employees / volunteers, whether for permanent, temporary or casual posts. Our recruitment policies will be adhered to during this process.

In particular, references will be obtained regarding known honesty and integrity of potential employees / volunteers before employment offers are made.

6. Detection and investigation

There are systems and controls in place to deter fraud or corruption, but it is often the vigilance of employees / volunteers that aids detection.

In some cases fraud is discovered by chance or by “tip-offs” and arrangements will be in place to enable such information to be properly dealt with. Any decision to refer a matter to the police will be taken by the Management Team.

We will normally wish the police to be made aware of and investigate independently where financial impropriety is discovered.

Our disciplinary procedures will be used to facilitate a thorough investigation of any allegations of improper behaviour by employees / volunteers.

7. Awareness and training

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We recognise that the continuing success of this strategy and its general credibility will depend in part on the effectiveness of programmed training and an awareness of employees / volunteers throughout the OCHL.

To facilitate this, positive and appropriate provision will be made via induction and for employees / volunteers via their development plans. This may include specialist training for certain employees / volunteers.

8. Review of this policy

This procedure will be kept under regular review to ensure its effectiveness. Any comments on this procedure should be made to the Management Team.

OCHL - February 2024

DECLARATION OF GIFTS/HOSPITALITY

Name of staff / volunteers / Management Team	Description of gift hospitality (please include dates and what prompted the gift if appropriate)	Source of gift and connection to GDT	Approximate value	Manager informed and any other action taken	Date of entry