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Incorporating

THE HS & SV AND D & M GREIG FUNDS
THE DAVID GREIG EDUCATIONAL TRUST

Anti-Fraud policy – General background

The importance of an anti-fraud policy framework

A robust anti-fraud policy framework is a key strand to any organisation's anti-fraud programme and is a means by which it can communicate to staff, and other key stakeholders, its philosophy and stance regarding fraud risk management.

By visibly supporting and adhering to these policies, management can demonstrate the appropriate 'tone from the top', and ensure that individuals have a clear understanding of what is acceptable.

A comprehensive fraud risk policy framework commonly comprises:

- code of ethics,
- code of conduct,
- anti-fraud policy, and
- fraud response plan.

The key benefits of an anti-fraud policy include:

- it acts as an effective deterrent to the potential fraudster;
- it sets out the organisation's stance on fraud and promoting compliance with a consistent set of behaviours;
- it helps staff to determine what course of action to take when facing ethical dilemmas or 'grey areas';
- it minimises the costs associated with dealing with fraud incidents. The charity's clear expectations, when set out in formal antifraud policy, will inform the investigation and the consideration of the breach and will allow for the termination of a contract and criminal proceedings, if necessary; and
- it reduces the risk of sanctions being applied by the charity in relation to fraud being challenged eg staff member disputing dismissal for a fraud-related incident.

What should an anti-fraud policy contain?

The elements of a anti-fraud policy will be different for each organisation, depending on the specific procedures and related policies in place. There are however a number of generic elements which are often seen in an effective anti-fraud policy.

Set out below is a model anti-fraud policy which provides guidance on these generic elements:

Summary

In summary the following observations are critical for the successful implementation of an effective anti-fraud policy:

- anti-fraud policies must be current and relevant;

- anti-fraud policies must be communicated to the relevant stakeholder groups; and
- anti-fraud policies need to be communicated through a variety of channels.

Finally, fraud risk and the policy framework which surrounds it should not be treated like the elephant in the room. Clear communication and discussion of fraud risks and the anti-fraud policies will help your charity in creating a culture where issues are raised and appropriate actions taken to limit the damage from fraud.

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ANTI FRAUD POLICY

1. Introduction

Purpose

The purpose of this policy is to ensure that all persons to which this policy applies understand what constitutes fraud, the Trust's attitude and approach towards it, and what is expected of them in relation to the prevention and reporting of fraud.

Scope

The anti-fraud policy applies to any fraud, or suspected fraud, involving , trustees, beneficiaries and external parties, including contractors, consultants and advisers, doing business with the Trust.

Responsibility

All parties to whom this policy applies have a responsibility to assist in the prevention and detection of fraud perpetrated against the Trust:

- operating and monitoring the systems of internal controls which promote the prevention of fraud;
- detection, including being alert to the possibility that unusual events or transactions could be indicators of fraud;
- assisting in the investigation of fraud;
- management of fraud risk; and
- reporting all suspicions of fraud and situations that could allow a fraud to be perpetrated. The Administrator retains ultimate responsibility for the anti-fraud framework within the Trust.

2. Policy

Definition

Fraud is an intentional act of deceit to obtain or attempt to obtain an unjust /illegal advantage, for example to make a gain (financial or otherwise), to avoid an obligation or to cause loss to another party.

For the purposes of the anti-fraud policy, the term 'fraud' includes attempted fraud.

For the purposes of this policy, fraud includes, but is not limited to, the following examples:

- accepting or offering kickbacks or bribes for preferential treatment, for example in the supplier-selection or work-allocation processes;

theft, misappropriation or unauthorised use of charity time, funds, property or other assets;

- deliberately creating or manipulating false or misleading financial or non-financial information or records. This includes forging or altering financial or non-financial information or records, or concealing material financial or non-financial facts (for example submission of a false CV); or
 - knowingly submitting fraudulent receipts or falsifying an expense report.

3. Procedures

Reporting procedures

Concerns should be raised directly with the Administrator, in the event you are not comfortable to report to this person you should report to the Chair of Trustees

Protection of whistleblowers

This Trust is committed to ensuring that all parties to whom this policy applies can raise a concern relating to fraud or suspicions of fraud without fear of victimisation. Where reports are made in good faith, the charity will ensure as far as possible that the Administrator or others who make them may do so without fear of any adverse consequences.

Where allegations are clearly false or made with malicious intent, the person(s) responsible for making such allegations may be subjected to disciplinary or other appropriate action.

Investigations and resulting action

The Trust commits to investigate all frauds that are discovered or suspected. Every case of attempted, suspected or proven fraud will be thoroughly investigated. Cases will be dealt with appropriately without regard to the position held or length of service of the individual(s) concerned, or their relationship to the Trust.

The investigation will be carried out by appropriately-skilled person(s), in line with the charity's fraud response plan.

Where the issue is one of suspected fraud, no person should attempt to conduct their own investigations. A witness or suspect may be asked to assist the investigation and will be expected to co-operate. All investigations will be conducted in accordance with the laws of natural justice and in consultation with human resources department and legal advice.

Enforcement

Any individual who is under investigation for suspected or discovered fraud may be suspended, pending the outcome of the investigation.

Where the allegations are substantiated, disciplinary action, up to and including termination of employment, may be taken. Where the allegations are substantiated, any other party to whom this policy applies may have their contract with the charity terminated and/or appropriate action may be taken against the individual(s) concerned, and legal redress may be sought.

Implications of non-compliance

Non-compliance with the anti-fraud policy by any party to whom it applies, may result in a recommendation to terminate their contract or involvement with the charity or terminate the engagement of the individual(s), within that contracting entity, found to be in breach of the policy.

Confidentiality

This Trust treats all information received confidentially. Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect the Trust from civil liability.

Revision

This policy shall be reviewed on a regular basis.

4. Appendices

The following appendices are attached to this policy

- Code of Conduct for Trustees(A)
- Trustee Expenses Policy (B)
- Whistleblowers Policy (C)
- Fraud Response Plan (D)
- Examples of good management practices which may assist in combating fraud. (E)

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CODE OF CONDUCT FOR TRUSTEES

General

1. I will act within the governing document of The Greig Trust and the law, and abide by the policies and procedures of the organisation. This includes having a knowledge of the contents of the governing document and relevant policies and procedures.
2. I will support the objects and mission of The Greig Trust, championing it, using any skills or knowledge I have to further that mission and seeking expert advice where appropriate.
3. I will be an active trustee, making my skills, experience and knowledge available to The Greig Trust and seeking to do what additional work I can outside trustee meetings, including sitting on sub-committees.
4. I will respect organisational, board and individual confidentiality, while never using confidentiality as an excuse not to disclose matters that should be transparent and open.
5. I will develop and maintain a sound and up-to-date knowledge of The Greig Trust and its environment. This will include an understanding of how The Greig Trust operates, the social, political and economic environment in which it operates and the nature and extent of its work.
6. I will use The Greig Trust resources responsibly, and when claiming expenses will do so in line with The Greig Trust procedures.
7. I will seek to be accountable for my actions as a trustee of The Greig Trust and will submit myself to whatever scrutiny is appropriate.
8. I accept my responsibility to ensure that The Greig Trust is well run and will raise issues and questions in an appropriate and sensitive way to ensure that this is the case.

Managing interests

1. I will not gain materially or financially from my involvement with The Greig Trust unless specifically authorised to do so.
2. I will act in the best interests of The Greig Trust as a whole, and not as a representative of any group – considering what is best for The Greig Trust and its present and future beneficiaries and avoiding bringing The Greig Trust into disrepute.
3. Unless authorised, I will not put myself in a position where my personal interests conflict with my duty to act in the interests of the organisation.
4. Where there is a conflict of interest I will ensure that this is managed effectively in line with The Greig Trust policy.

I understand that a failure to declare a conflict of interest may be considered to be a breach of this code.

Meetings

1. I will attend all appropriate meetings and other appointments at The Greig Trust or give apologies. If I cannot regularly attend meetings I will consider whether there are other ways I can engage with The Greig Trust.
2. I will prepare fully for all meetings and work for the organisation. This will include reading papers, querying anything I do not understand, thinking through issues before meetings and completing any tasks assigned to me in the agreed time.
3. I will actively engage in discussion, debate and voting in meetings; contributing in a considered and constructive way, listening carefully, challenging sensitively and avoiding conflict.
4. I will participate in collective decision making, accept a majority decision of the board and will not act individually unless specifically authorised to do so.

Governance

1. I will actively contribute towards improving the governance of the trustee board,
2. I will participate in induction and training and sharing ideas for improvement with the trustee board.
3. I will help to identify good candidates for trusteeship at The Greig Trust and, with my fellow trustees, will appoint new trustees in accordance with agreed selection criteria.

Relations with others

1. I will endeavour to work considerately and respectfully with all those I come into contact with at The Greig Trust. I will respect diversity, different roles and boundaries, and avoid giving offence.
2. I recognise that the roles of trustees, contractor and consultants of The Greig Trust are different, and I will seek to understand and respect the difference between these roles.
3. I will seek to support and encourage all those I come into contact with at The Greig Trust. In particular I recognise my responsibility to support the chair and the administrator.
4. I will not make public comments about the organisation unless authorised to do so. Any public comments I make about The Greig Trust will be considered and in line with organisational policy, whether I make them as an individual or as a trustee.

Leaving the Trustee Board

1. I understand that substantial breach of any part of this code may result in procedures being put in motion that may result in my being asked to resign from the trustee board.
2. Should this happen I will be given the opportunity to be heard. In the event that I am asked to resign from the board I will accept the majority decision of the board in this matter and resign at the earliest opportunity.
3. If I wish to cease being a trustee of The Greig Trust at any time, I will inform the chair in advance in writing, stating my reasons for leaving.

Signed **Date**

Name

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Appendix B

TRUSTEE EXPENSES POLICY

1. Introduction

The Greig Trust believes that no potential trustee should be excluded from taking up a position on the board simply because of financial constraints, if they are otherwise eligible and suitable to become a trustee. All trustees are entitled to reimbursement of actual expenses incurred while carrying out legitimate business of The Greig Trust

This policy seeks to ensure that all Trustees are aware of what type of expenditure can be claimed for, and of the current applicable rates of compensation.

2. Commitment to Equalities

The Greig Trust is firmly committed to equality of opportunity for all, in all areas of life. For this reason The Greig Trust warmly and actively encourages people of currently under-represented groups to join the board. It is recognised that some groups may be more likely to claim expenses for reasons inherent to their being underrepresented. Examples include (but are not limited to):

- people with disabilities
- people who may speak English as an additional language
- people with caring responsibilities (including lone parents)
- people from neighbourhoods with high unemployment

Even those Trustees whose activities on The Greig Trust behalf are limited to attending meetings will incur some expenses however small (for example, for travel).

Often, such Trustees are happy to 'donate' their expenses to the charity, by not claiming for them.

In all cases, Trustees are respectfully asked to declare their intention to claim expenses as soon as possible on taking up their position on the board or after a change in circumstances which will result in a possible need to claim (an increased level of) expenses. This will assist the Trust Administrator in maintaining accurate budgets and expenditure forecasts for the organisation.

TRUSTEE EXPENSES PROCEDURES

3. Expenses claim procedure

Trustees are asked to obtain and retain all receipts of expenditure, as no expenditure can be reimbursed without them. In order to maintain accurate cash flows, Trustees are requested to submit expenses for the calendar month by the 15th of the following month.

Any claims likely to be in excess of £100 should be notified to The Trust Administrator in advance of expenditure actually taking place.

Trustees are entitled to claim under the following categories:

- Travel
- Personal support

- Caring
- Accommodation
- Refreshments and Subsistence

4. Travel Expenses Incurred by Trustees

Trustees are strongly encouraged to use public transport, and to purchase the most economical fares possible. For some trustees there may be circumstances where it is not possible or desirable for them to use public transport.

Trustees using their own vehicles while on The Greig Trust business will be reimbursed at the approved mileage rate upon submission of monthly expense accounts. Travel eligible for reimbursement will normally begin and end at the Trustee's home.

In limited circumstances, trustees will be entitled to reimbursement for the full cost of travel by taxi. This includes for example: Trustees with mobility impairments, Trustees travelling alone after 11.30pm, trustees having to make multiple stops, for example to collect children from a carer before taking them home.

The mileage rate for 2015-16 is:

Cars & Vans: On the first 10,000 miles travelled on any business related travel in the tax year 45p per mile

On each additional mile over 10,000 miles 25p per mile

Motor cycles: 24p per mile

Bicycles: 20p per mile

5. Enabling or support costs, such as personal care or lipspeaking

The Greig Trust will pay for all costs associated with the need for a trustee to have a personal assistant, community interpreter, British Sign Language Interpreter or use of an induction loop incurred on legitimate business of The Greig Trust. It is essential that arrangements are made in advance via The Greig Trust administrator to ensure that the best rate is obtained and also to enable the service provider to bill the organisation directly.

6. Care of dependants

The Greig Trust will reimburse all childcare or carer expenses incurred by Trustees while participating in Trustee meetings or conducting other trustee work for the organisation.

As with other categories of expenditure, The Greig Trust requires an invoice. Where care has been provided by a non-professional, it is suffice for the carer to provide a signed declaration which clearly states the date, amount charged and name of the person that the payment has been received from. The Greig Trust will reimburse up to £5 per hour for the care of one child, up to £7 per hour for the care of two or more children, and up to £10 per hour for the care of someone with a disability.

The Greig Trust recommends that a registered child minder or care assistant is employed, but realises that this decision is the right of a parent, guardian or person requiring assistance. The responsibility for the quality of childcare commissioned lies with the parent or carer and needs to conform to the Children's Act.

7. Trustees' Attendance at Events

Trustees may receive invitations to attend special events in their capacity as board representatives. Trustees are required to make formal proposals for expenditures of this nature at trustee meetings prior to the event taking place. The agreed expenses incurred for such events can be reimbursed in the normal way by submitting the amount on a monthly expense account.

8. Trustee Accommodation

If Trustees are on agreed business of The Greig Trust and an overnight stay is required, formal notification should be put forward at a trustee meeting. It is essential that arrangements are made via The Greig Trust Administrator

9. Trustee Refreshments and Subsistence

Light refreshments may be provided at Trustee meetings. The Greig Trust requires trustees to put forward a formal proposal for expenditure on subsistence to be considered at a Trustee meeting, for all those considering travelling on business of The Greig Trust

10. Miscellaneous Expenses Incurred by Trustees

Occasionally, other minor miscellaneous expenses could be incurred by a Trustee and these may be submitted for reimbursement. Generally, such items will be limited to reasonable postage and telephone costs. Small quantities of envelopes and stationery items may be provided on request from the Trust Administrator

12. Complaints and Appeals Procedure

Items not specifically identified within this policy are not eligible for reimbursement unless specifically approved by the board. Where a Trustee has been denied entitlement for reimbursement for an item, the Trust Administrator will notify the Trustee in writing of the reason for such disqualification within five working days.

Trustees disputing the eligibility of any expense item may appeal to the Board in writing and must do so within five working days of notification of the entitlement being denied. The Board will consider the appeal and make its decision. The decision will be final and binding.

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"WHISTLEBLOWING" POLICY

Appendix C

(Making a Disclosure in the Public Interest)

Introduction

The Greig Trust is committed to the highest standards of openness, probity and accountability.

An important aspect of accountability and transparency is a mechanism to enable the Administrator and Trustees to voice concerns in a responsible and effective manner. Where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

The Public Interest Disclosure Act, which came into effect in 1999, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The Trust has endorsed the provisions set out below so as to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Trust nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the "whistleblowing" procedures are in place, it is reasonable to expect the Administrator/Trustees to use them rather than air their complaints outside the Trust.

Scope of Policy

This policy is designed to enable the Administrator/Trustees of the Trust to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation.
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

Safeguards

i. Protection

This policy is designed to offer protection to those of the Trust who disclose such concerns provided the disclosure is made:

- in good faith

- in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.

ii. Confidentiality

The Trust will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

iii. Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Trust.

In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

iv. Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information.

Procedures for Making a Disclosure

- Complaints of malpractice will be investigated by the Chairman of the Trustees unless the complaint is against the Chairman of the Trustees or is in any way related to their actions. In such cases, the complaint should be passed to the Chairman of the Investment Committee for referral.

If there is evidence of criminal activity then the investigating officer should inform the police. The Trust will ensure that any internal investigation does not hinder a formal police investigation.

Timescales

Due to the varied nature of these sorts of complaints, which may involve internal investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to their home address.

Investigating Procedure

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the Administrator or individual trustee against whom the complaint is made as soon as is practically possible. The Administrator will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures.
- The investigating officer should consider the involvement of the Trust auditors and the Police.
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement.
- A meeting of the Trustees will be convened to decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Trust procedures.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcomes will be passed to the Trust Auditors to enable a review of the procedures.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, the Trust recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons (such as the Health and Safety Executive, the Inland Revenue, or the Charity Commission) or, where justified, elsewhere.

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FRAUD RESPONSE PLAN

Appendix D

The anti fraud policy detailed above clarifies how the Administrator and Trustees may disclose their concerns about actual or suspected fraudulent activity within The Greig Trust and how those will be handled.

The Greig Trust will:

- i. Investigate and secure evidence for possible criminal, civil and internal disciplinary proceedings;
- ii. Notify the chairman of the Trustees of The Greig Trust of incidents and also the Trusts auditors;
- iii. Undertake disciplinary and any related investigations within The Greig Trust where appropriate;
- iv. Seek redress for ascertained financial loss;
- v. Identify areas of system weakness or failure giving rise to a fraudulent act and take corrective or preventative action to avoid future incidents; and,
- vi. Ensure compliance with Proceeds of Crime Act 2002, Money Laundering Regulations 2007, Bribery Act 2010, Charities Act 2006 and any other relevant legislation.

A fraud response plan and appropriately qualified response team will provide the best protection against further losses and ability to secure evidence necessary for criminal or disciplinary action. The scale and nature of the issues uncovered should be kept under review in the context of the Charity Commission requirements for Trustees to report 'serious or significant' issues defined as follows:

- significant financial loss to the charity;
- charities deliberately being used for significant private advantage;
- issues that could damage the reputation of an individual charity or class of charities or the wider charity sector;
- criminality or illegal activity within or involving a charity;
- issues that could damage public trust and confidence in charities or in the Commission as an effective regulator;
- serious harm to beneficiaries and, in particular, vulnerable beneficiaries;
- threats to national security, specifically terrorism;
- sham charities set up for an illegal or improper purpose; or
- where a charity's independence is seriously called into question.

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Examples of good management practices which may assist in combating fraud.

Part of an effective strategy for combating fraud and safeguarding of charitable funds is a clear and documented anti-fraud policy and code of conduct. These need to be clearly communicated to staff, volunteers and other third parties. For example, in contracts with third-party fundraisers, compliance with the charity's anti-fraud policies can be included as a binding requirement.

A practical approach for design of specific antifraud controls is to consider the trail of funds from source to expenditure on goods and services for beneficiaries. Who are the key individuals and critical systems and controls at each stage? How easily could the controls be circumvented? How much control is vested in any one individual or third-party organisation? What is the level of oversight? The answers to these questions would provide insights on areas of vulnerability and corresponding controls, which include examples set out below.

Internal fraud

- The vetting of all consultants, including checking the accuracy of references and qualifications and background. Increased scrutiny in line with the individuals' seniority and level of responsibility and access to the charity's funds and other assets.
- Ensuring adequate segregation of duties to minimise the opportunity for one person to be responsible for initiating, executing and recording transactions.
- Ensure the physical security of cheques, cash and other assets. It is important to make sure that the controls have evolved with the size and operations of the charity. For example, in one case a charity found that the finance director has a limit of £5,000 on signing of cheques, but unlimited authority in relation to online fund transfers.
- Monitor financial plans against actual to identify patterns or results which are out of the ordinary. For example, over time charities gather information on 'average' funds raised from particular types of events, including margins on trading events. This information can be used to identify reported results which are out of line with expectations and may be an indicator of fraud, waste or error.
- Policy on paying expenses to staff and volunteers. Expenses require approval from a person independent of the claimant.
- Establish monitoring procedures to ensure grants and donations have been used for the intended purposes, for example, through sample verification of invoices and beneficiary projects to which they relate.
- Perform site visits to major beneficiaries.
- Whistleblowing Policy encourages staff and trustees to report suspicions of fraud.
- Provide training for staff and volunteers (in particular those with responsibilities in relation to bank, cash and other assets) to raise awareness of fraud warning signs.

External fraud

- Use software programs to monitor websites with identical or similar names.
- Encourage public reporting by setting up a dedicated email address for reporting fraudulent emails or websites.