



# Anti-fraud and anti-corruption policy

This policy applies to management committee members, volunteers and all staff. (Updated February 2025)

1. Dobcross Village Society Ltd (DVS) expects directors and employees at all levels - including temporary and volunteer workers ("staff") - 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 organisation 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 organisation 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

2.1 Sometimes people connected with DVS will wish to say thank you to individuals. Any small gifts or hospitality to the individual value of £15 need not be declared, although all staff will be encouraged 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.

2.2 Where someone feels uncomfortable receiving a gift they should politely decline.

2.3 Wherever possible, receiving of hospitality or gifts from suppliers should be avoided. On occasions when gifts arrive the shop manager must be informed to 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.



### Dobcross Village Society Ltd

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### 3. Reporting allegations of fraud or corruption

3.1 Concerns must be raised when employees reasonably believe that one 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.

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

3.3 Those who defraud DVS, or who are corrupt, or where there has been financial malpractice will be dealt with firmly. 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 raising malicious allegations).

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

### 4 The role of managers

4.1 Managers and management committee members (“the management team”) are responsible for the communication and implementation of this policy in their work area. They are also responsible for ensuring that all employees are aware of our Financial Regulations and that the requirements of these are being met in their everyday business activities.

4.2 The management team are expected to strive to create an environment in which staff feel able to approach them with any concerns they may have about suspected irregularities. The store managers or any of the management team contacted about any issue in this area is responsible for initially following up any allegation of fraud or corruption received and will:

- Deal promptly with the matter
- Report the matter to the Chair of the Management Committee or any member of the Management Committee.
- Obtain advice from the Chair of the Management Committee or any member of the Management Committee. who will arrange for an appropriate investigation to be carried out



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- 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**

5.1 Employees 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 DVS.

5.2 Employees 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 Chair of the Management Committee or any member of the Management Committee..

5.3 If employees 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>

5.4 It is recognised 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, whether for permanent, temporary or casual posts. Our recruitment policies will be adhered to during this process.

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

## **6 Detection and investigation**

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

6.2 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 Chair of the Management Committee.



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6.3 The police will be made aware of and investigate independently where financial impropriety is discovered.

6.4 The DVS disciplinary procedures will be used to facilitate a thorough investigation of any allegations of improper behaviour by employees.

## **7 Awareness and training**

7.1 It will be recognised 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 throughout the organisation.

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

## **8 Review of this policy**

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

Declaration of gift logs follow



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### Declaration of gifts from the public or people connected with DVS

All gifts or hospitality to the value of £30 or over which are received by an individual in any 6 month period should be declared using this form.

Date	Gift	Value	Gifter	Receiver



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## Anti-fraud and anti-corruption policy

### Declaration of gifts from a DVS supplier

All gifts or hospitality to the value of £15 or over which are received from a DVS supplier should be declared using this form.

Date	Gift	Value	Gifter	Receiver



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