

## Anti-Corruption, Fraud & Financial Misconduct Policy

### 1. Policy Statement

Charlton Premier Skills has zero tolerance for corruption, fraud or financial misconduct. We are committed to:

- Maintaining the highest standards of financial integrity
- Protecting organisational assets and charitable funds
- Complying with all relevant UK laws including:
  - Bribery Act 2010
  - Fraud Act 2006
  - Charities Act 2011

### 2. Definitions & Scope

**Prohibited Conduct Includes:**

Category	Examples
Fraud	False expense claims, invoice manipulation, payroll fraud
Bribery	Offering/accepting improper inducements
Corruption	Abuse of position for personal gain
Theft/Misuse	Unauthorised use of assets/funds
Financial Mismanagement	Breach of financial controls, falsifying records

**Applies to:** All staff, volunteers, trustees, contractors and partners

### 3. Prevention Measures

#### Financial Controls

- Dual authorization for payments >£500
- Regular bank reconciliations by non-transacting staff
- Segregation of financial duties
- Annual external audit

## Due Diligence

- Vetting of new suppliers/partners
- Anti-bribery clauses in all contracts
- Trustee review of related-party transactions

## Training

- Mandatory anti-fraud training for finance staff
- Annual refreshers for all personnel
- Whistleblowing procedure education

## 4. Reporting Procedure

### How to Report

1. **Primary Channel:**  
[Programmes@charltonpremierskills.org.uk](mailto:Programmes@charltonpremierskills.org.uk)
2. **Alternative Channel** (for allegations involving senior staff):  
[Chair of Audit Committee]  
[governance@charltonpremierskills.org.uk](mailto:governance@charltonpremierskills.org.uk)
3. **External Options:**
  - Action Fraud (0300 123 2040)
  - Charity Commission Whistleblowing

*Anonymous reports accepted but may limit investigation*

### What to Report

- Suspected fraudulent activity
- Circumvention of financial controls
- Requests for/offers of bribes
- Conflicts of interest

## 5. Investigation Process

1. **Initial Assessment:** Within 3 working days
2. **Investigation Team:** Comprising at least:
  - Finance representative
  - Trustee (non-conflicted)
  - External advisor if required
3. **Timescale:**
  - Preliminary findings within 15 working days

- Complex cases within 30 days

#### 4. Outcomes:

- Disciplinary action
- Police referral if criminal
- System improvements

#### 6. Disciplinary Consequences

##### Depending on severity:

- Recovery of misused funds
- Termination of employment/contracts
- Legal prosecution
- Charity Commission reporting
- Debarment from future contracts

#### 7. Protection & Confidentiality

- Whistleblowers protected under our Whistleblowing Policy
- Victimization of reporters treated as gross misconduct
- Limited disclosure on need-to-know basis

#### 8. Policy Governance

- **Annual Review** by Audit Committee
- **Trustee Oversight:** Quarterly fraud risk updates
- **Public Transparency:** Summary in Annual Report

##### Approved by:

[Name]

[Position]

Charlton Premier Skills

[Date]

##### Related Policies:

- Whistleblowing Policy
- Financial Controls Policy
- Gift & Hospitality Register
- Conflicts of Interest Policy

*This policy is communicated to all stakeholders during induction and reinforced through annual training.*

*All staff/trustees must confirm understanding annually via signed declaration.*

