

Title	Anti-fraud, bribery and corruption policy	
Aim	The aim of this policy is to set out J T Blair's Charity's stance on fraud, bribery and corruption and its approach to preventing, detecting, reporting and investigating fraud, bribery and corruption.	
Scope	This policy is applicable to, and must be followed by, all staff including consultants and contractors. Failure to comply could result in disciplinary action, including dismissal.	
Related Policies / Documents / Procedures	The Anti-fraud, bribery and corruption policy is related to many of J T Blair's Charity other policies and documents but in particular to: <ul style="list-style-type: none"> • Data Protection Policy • Whistleblowing 	
Date for Implementation	December 2019	
Approved by	Trustees	4 December 2019
Date of next review	December 2020	
Date of last review	None	
Distribution	All Trustees Website	
Version Control	Previous Versions approved: None	

Policy

J T Blair's Charity has a 'zero tolerance' policy towards fraud, bribery and corruption.

This means that:

- It does not accept any level of fraud, bribery or corruption within the organisation or by any other individual or organisation receiving funds or representing the charity; and
- It will always seek to take disciplinary and/or legal action against those found to have perpetrated, be involved in, or assisted with fraudulent or other improper activities in any of its operations.

J T Blair's Charity is committed to developing an anti-fraud culture and keeping the opportunities for fraud, bribery and corruption to the absolute minimum.

The charity requires all staff and Trustees to act honestly and with integrity at all times and to safeguard the resources for which they are responsible.

Definitions

Fraud is knowingly making an untrue or misleading representation with the intention of making a gain for oneself or another or causing a loss, or risk of loss, to another.

Bribery is giving or offering someone a financial or other advantage to encourage that person to perform their functions or activities improperly, or to reward someone for having already done so.

A **facilitation payment** is a type of bribe. An example is an unofficial payment or other advantage given to a public official to undertake or speed up the performance of their normal duties.

Corruption is the misuse of entrusted power for personal gain. This would include dishonest or fraudulent behavior by those in positions of power, such as managers or government officials. It would include offering, giving and receiving bribes to influence the actions of someone in a position of power or influence, and the diversion of funds for private gain.

A **conflict of interest** is where an individual has private interests that may or actually do influence the decisions that they make as an employee or representative of an organisation.

Risk and internal control systems

J T Blair's will seek to assess the nature and extent of its exposure to the risks of internal and external fraud, bribery and corruption. It will regularly review these risks, using information on actual or suspected instances of fraud, bribery and corruption to inform its review.

The charity will seek to put in place efficient and effective systems, procedures and internal controls to: encourage an anti-fraud culture; prevent and detect fraud, bribery and corruption; and reduce the risks to an acceptable level.

J T Blair's Charity will seek to equip its Trustees and Secretary with the skills, knowledge and expertise to manage its fraud risk effectively. It will provide adequate training to make them aware of the risks of fraud, bribery and corruption, and of their responsibilities in preventing, detecting, and reporting it.

The charity will make all those receiving funds or representing the charity, including its suppliers, grant recipients, partners, contractors and agents aware of this policy.

J T Blair's Charity will work with relevant stakeholders, including comparable organisations, relevant regulators and government organizations to tackle fraud.

The charity will regularly review and evaluate the effectiveness of its systems, procedures and internal controls for managing the risk of fraud. It will do this through risk management and assurance processes and audit arrangements.

Reporting - internal

All staff must immediately report any suspected or actual instances of fraud, bribery or corruption. This includes offers to pay bribes, solicitation of bribes and demands to make facilitation payments. Failure to report could result in disciplinary action.

Reports should be made to the Secretary. If staff are not comfortable reporting their concerns to the Secretary then they can contact the Chair of Trustees.

J T Blair's Charity also requires all those receiving funds or representing the charity, including its suppliers, grant recipients, partners, contractors and agents, to report to any suspected or actual instances of fraud, bribery or corruption involving charity assets or staff. Reports should be made to the Secretary to the Trustees via jtblairs@gmail.com

J T Blair's Charity will not penalise anyone for raising a concern in good faith, even if it turns out to be unfounded. Any member of staff who harasses or victimises someone for raising a concern in good faith will themselves be subject to disciplinary action.

J T Blair's Charity will maintain a system for recording: all reports of actual or suspected fraud, bribery and corruption; the action taken; and the outcome of any investigation. It will use this information to inform its review of the risks and the effectiveness of its controls.

Reporting – external

J T Blair's Charity will fully meet its obligations to report fraud, bribery and corruption to third parties. The Fraud Response Plan sets out: the parties that suspected or actual fraud, bribery or corruption must be reported to; the nature and timing of the disclosure required; and who is responsible for making the report.

Investigation

J T Blair's Charity will take all reports of actual or suspected fraud, bribery and corruption seriously, and investigate proportionately and appropriately.

J T Blair's Charity will always seek to take disciplinary and/or legal action against those

found to have perpetrated or assisted with fraudulent or other improper activities in any of its operations. For staff, this may include dismissal. It will also seek to recover any assets lost through fraud.

Specific risk mitigation measures

To manage the exposure to bribery and corruption, all gifts and hospitality received by staff and given to Public Officials must be approved in line with the delegated authorities and recorded on the Gifts and Hospitality Register.

Conflicts of interest are known to increase the risk of fraud. Therefore all Trustees or staff who have an interest in an actual or potential supplier (whether personally, or through family members, close friends or associates) must report that conflict of interest to the Secretary.