



Anti-fraud Policy Statement

Policy Statement:

Disability Equality (NW) (DENW) is committed to the prevention of fraud and the promotion of an anti-fraud culture. DENW operates a zero-tolerance attitude to fraud and requires staff to act honestly and with integrity at all times, and to report all reasonable suspicions of fraud. DENW will investigate all instances of actual, attempted and suspected fraud committed by staff, consultants, suppliers and other third parties and will seek to recover funds and assets lost through fraud.

Perpetrators will be subject to disciplinary and/or legal action. This policy is endorsed and supported by the Board of Directors and Chief Executive Officer.

Definition of Fraud:

The term 'fraud' is commonly used to describe the use of deception to deprive, disadvantage or cause loss to another person or party. This can include theft, the misuse of funds or other resources or more complicated crimes such as false accounting and the supply of false information. Individuals can be prosecuted under the Fraud Act 2006 if they make a false representation, fail to disclose information or abuse their position. DENW has established procedures to encourage staff to report actual, attempted or suspected fraud and/or other forms of illegal activity without fear of reprisal.

Key Responsibilities:

The Chief Executive of DENW is responsible for:

- Developing, implementing and maintaining adequate systems of internal control to prevent and detect fraud

- Regularly reviewing DENW's anti-fraud policy statement and compliance to ensure it remains effective and relevant to the needs of the business
- Investigating all allegations of fraud and commencing disciplinary and/or legal action where appropriate
- Reporting to the Board of Directors on all aspects of fraud risk management

Managers are responsible for:

- Familiarising themselves with the types of fraud and dishonesty that might occur within their business units
- Monitoring compliance with internal controls and agreed policies and procedures
- Notifying their Chief Executive (or other specified person) of any indications of fraudulent activity

Staff are responsible for:

- Ensuring that DENW's reputation and assets are protected against fraud
- Reporting known or suspected fraud
- Assisting in the investigation of suspected fraud

Reporting Suspicions:

Staff must report concerns about actual, attempted or suspected fraud to their line manager. Staff should not attempt to investigate and fraud themselves.

The Public Interest Disclosure Act 1998 protects employees who raise concerns about certain matters of public interest in good faith. A copy of the DE(NW) Whistleblowing Policy can be found on the shared drive.

Fraud Response Plan:

DE(NW) has established guidelines for senior managers on the immediate actions to be taken in the event of a fraud being discovered or suspected within their business unit. It covers reporting and recording requirements, securing evidence and preventing further losses, and the investigation process.