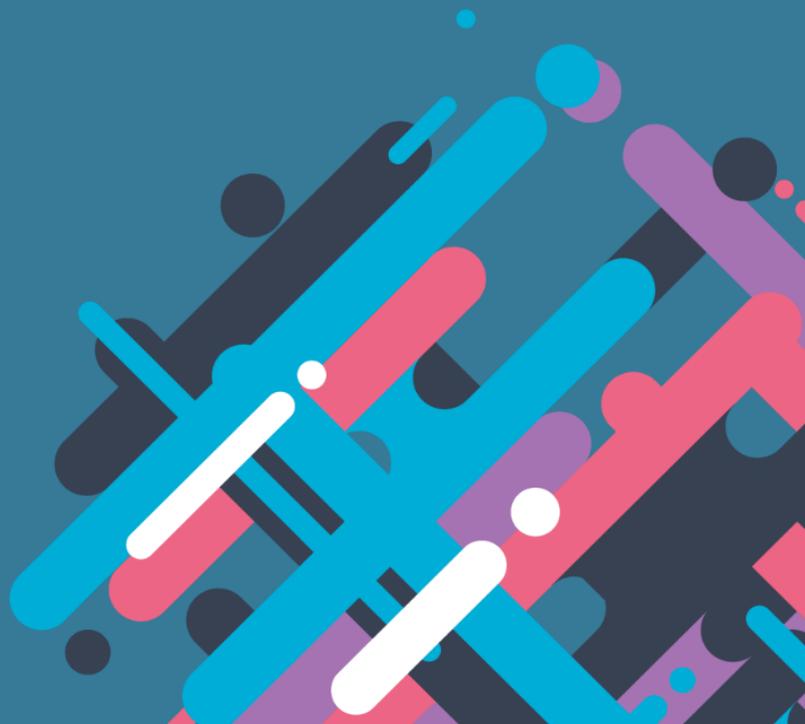


BIG BURNS SUPPER

Anti-Fraud Policy

Updated November 2019



Anti Fraud and Corruption Policy

1. Introduction

- a. Electric Theatre Workshop Limited is committed to fulfilling its responsibility to protect the funds it administers against fraud and corruption. This policy is designed to:
 - i. Promote standards of honest and fair conduct
 - ii. Encourage prevention of fraud and corruption
 - iii. Maintain strong systems of internal control
 - iv. Promote detection
 - v. Pursue a zero tolerance policy and bring justice to anyone who commits an act of fraud or corruption
 - vi. Recover any losses incurred by the organisation
- b. The organisation will continually strive to ensure that all of its financial, contractual and administrative processes are conducted and reported honestly, accurately, transparently and accountably, and that all decisions are taken objectively and free from personal interest. The organisation does not condone any behaviour that falls short of these principles. The directors, staff and volunteers all have a responsibility for putting these principles into practice, and for reporting any breaches they may discover.

2. Culture

- a. Electric Theatre Workshop Limited is a charity, and the charity culture is intended to foster honesty, and is underpinned by seven principles of behaviour. These are:
 - i. Selflessness
 - ii. Integrity
 - iii. Objectivity
 - iv. Accountability
 - v. Openness
 - vi. Honesty
 - vii. Leadership
- b. Directors, staff and volunteers are expected to lead by example in adhering to the organisations policies, procedures and practices. Equally, members of the public and external organisations, such as suppliers and contractors, are expected to act with integrity and without intent to commit fraud against the organisation.
- c. The organisation will provide clear routes by which concerns can be raised against directors, staff and volunteers by those outside of the organisation.

3. Definitions

- a. Fraud; the term fraud is used to describe acts of deception, bribery, forgery, concealment of material facts and collusion. For practical purposes, fraud may be defined as the use of deception with the intention of obtaining advantage, avoiding an obligation or causing a loss to another's property. Fraud is most often associated with a deliberate attempt to acquire money or goods dishonestly through the falsification of records or documents, and/or

the deliberate changing of financial statements or other records. The criminal act is the attempt to deceive and attempted fraud is therefore treated as seriously as accomplished fraud.

- b. Computer fraud; is where information technology equipment has been used to manipulate programmes or data dishonestly, or where the information system is a material factor in the preparation of fraud. Theft of fraudulent use of computer time and resources is included in this definition.
- c. Theft; dishonestly acquiring, suing or disposing of physical or intellectual property belonging to the organisation or to individual members of the organisation.
- d. Misuse of equipment; deliberately misusing materials or equipment belonging to the organisation.
- e. Abuse of position; exploiting the position of trust within the organisation.

4. Responsibilities

- a. In relation to the prevention of fraud, theft, misuse of equipment and abuse of position, specific responsibilities are as follows;
 - i. Trustee Directors; are responsible for establishing and maintaining a sound system of internal control that supports the achievement of the organisations policies, aims and objectives. The system of internal control is designed to respond to and manage the whole range of risks that the organisation faces. The system of internal control is based on an ongoing process designed to identify the principal risks, to evaluate the nature and extent of those risks and to manage them effectively. Managing fraud risk is seen in the context of the management of the wider range of risks.
 - ii. The Chief Executive Officer; has the overall responsibility for managing the risks of fraud and their responsibilities include; undertaking regular reviews of the fraud risk associated with each of the key organisational objectives, establishing effective anti-fraud response plans in proportion to the level of fraud risk identified, the design of an effective control environment to prevent fraud, and establishing the appropriate mechanisms for reporting fraud risk issues, reporting significant incidents of fraud or attempted fraud, liaising the organisations appointed auditors, liaising with the financial team, ensuring that all staff are aware of the organisations anti-fraud policy and know their responsibilities, ensuring that anti-fraud training is available as required and ensuring that appropriate action is taken to minimise the risk of previous frauds occurring in the future.
 - iii. Senior Management Team; hold the responsibilities of; ensuring that an adequate system of internal control exists within their areas of responsibility, and that controls operate effectively, preventing and detecting fraud as far as possible, assessing the types of risk involved in the operations for which they are responsible, reviewing the control systems for which they are responsible for regularly, ensuring that controls are being complied with and that their systems are continuing to operate effectively, and implementing new controls to

reduce the risk of similar fraud occurring where frauds have taken place.

- iv. Staff and Volunteers; have the responsibility to; act with propriety in use of the organisations resources, and the handling of funds whether they are involved with cash, receipts, payments or dealing with suppliers, conducting themselves in accordance with the seven principles set out above, being alert to the possibility that unusual events or transactions could be indicators of fraud and alerting their manager when they believe the opportunity for fraud exists, reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events, and cooperating fully with whoever is conducting internal checks or reviews of fraud investigations.

5. Detection and Investigation

- a. An irregularity is any incident or action which is not part of the normal operations of the system or expected course of events which may be a result of fraud.
- b. The chair of the Board of Trustees must be notified immediately of all financial or accounting regularities or suspected irregularities or of any circumstances which may suggest the possible irregularities including those affecting cash, stores, property, remuneration or allowances.
- c. Reporting of suspected irregularities is essential as it facilitates a proper investigation by experienced staff, and ensures the consistent treatment of information regarding fraud and corruption. When so notified, the Chair will instigate an investigation by appointing a designated officer, auditor and other advisor will; deal promptly with the matter, record evidence received, ensure the security and confidentiality of evidence, work closely with senior managers of the organisation and other agencies such as the police and courts to ensure that all issues are properly investigated and reported upon, ensure maximum recoveries are made on behalf of the organisation, and assist the senior managers to implement the organisations disciplinary procedures where considered appropriate (referral to the police will not prohibit or restrict action under the disciplinary procedure).
- d. No action will be taken against anyone who has reported a potential fraud should the suspicion turn out to be unfounded, provided that they have acted in good faith. Malicious accusations may be the subject of disciplinary action. The Public Interest Disclosure Act 1998 protects whistle-blowers from victimisation, discipline or dismissal where they raise genuine concern of misconduct or malpractice.
- e. An individual should not deal with an allegation or suspicion of fraud themselves but should refer them to their line manager. Should concern be about the line manager then it should be referred to the CEO. Should the concern be about the CEO it should be referred to the Chair. Should the concern be about the Chair it should be referred to the CEO or one of the other trustees.

6. Training

- a. An important contribution to the continuing success of an anti-fraud strategy, and its general credibility, lies in the effectiveness of programmed training, of Directors, staff and volunteers throughout the organisation. This will be achieved through the development of both induction and refresher training for all personnel involved in internal control systems to ensure that their responsibilities and duties in this respect are regularly highlighted.