



Anti-Fraud Policy

Last Reviewed: 1st June 2023



1. Statement of Intent

RammyMen, its staff, volunteers and members run a wide-range of activities and provide a wide-range of services, including mental health and peer support services. The organisation also provides coaching, mentoring, buddying, teaching, counselling, and other services.

The aim of this policy is to ensure that RammyMen CIC, its staff, directors, volunteers and contacts' conduct meet a minimum expected level of behaviour in regard to personal conduct, fraud and corruption.

RammyMen CIC has a zero-tolerance approach to any wrongdoing and will work thoroughly and comprehensively with law enforcement agencies to help identify, deter, detect and investigate any allegations of fraud or corruption.

This policy will be reviewed regularly and revised as appropriate under the guidance of the designated, Director-level Anti-Fraud Manager:

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This document should be read in conjunction with the the organisation's Code of Conduct for Volunteers.

2. Scope

2.1 RammyMen will not accept any suspicion of fraud or corruption to go unchallenged and uninvestigated, and expects an extremely high standard of behaviour of everyone directly and indirectly connected with the organisation and its work. This includes contractors, external consultants, suppliers, therapists and trainers as well as all volunteers, staff, directors and attendees.

2.2 RammyMen will also investigate fully and address any cases of suspected fraud or corruption within the organisation and with any of its contacts. Where any wrongdoing is suspected to have taken place, the appropriate authorities shall be informed and fully assisted in their investigation.

3 Definitions of Fraud, Bribery and Corruption

3.1 Fraud is committed by any person, internal or external to the organisation who by deception dishonestly:

- obtains property belonging to another with the intention of depriving the other of it
- obtains for him or herself or another any pecuniary advantage
- secures the remission of the whole or part of any existing liability to make a payment
- obtains, or seeks to obtain, for him or herself or another any pecuniary advantage with or without intent to cause loss to another by:
 - destroying, defacing, concealing or falsifying any account or any record or document made or required for any accounting or reporting purpose or
 - furnishing any account, or any such record or document, which to his or her knowledge is or may be misleading, false or deceptive in a material particular

3.2 Internal Fraud is fraudulent acts undertaken by directors, staff or volunteers

3.3 Corruption is the offering, giving, soliciting or acceptance of an inducement or reward (including any gift, loan, fee, or advantage) which may influence the action of any person with regard to the work or aims of RammyMen CIC.

4. Investigating an Allegation of Fraud - Procedure

4.1 Vigorous and prompt investigations will be carried out into all cases of actual or suspected fraud.

The focus of each investigation is to:

- minimise and recover losses
- establish and secure evidence necessary for criminal or disciplinary action
- review the reasons for the incident, the measures taken to prevent a recurrence, and any action needed to strengthen future responses to fraud
- keep appropriate personnel suitably informed
- assign responsibilities for investigating the incident
- establish circumstances in which external specialists should be involved

4.2 Initiating Action

All actual or suspected incidents should be reported to the Anti-Fraud Manager (details in section 1). You should not contact the suspected individual to determine facts or demand restitution, or for any other reason. Nor should you discuss the case, facts, suspicions or allegations with anyone else unless specifically asked to do so by the investigating officer.

4.3 Process of Investigation

Suspected fraud will be investigated without any undue delay, in an independent, professional manner and in the interests of all involved.

The investigation process will vary according to circumstances, and will be determined by the Anti-Fraud Manager who will take charge of the investigation on a day-to-day basis.

The Anti-Fraud Manager shall act in an independent manner.

The Anti-Fraud Manager shall not disclose the details of any suspected or actual incident to other persons, except where such disclosure is necessary to facilitate the investigation. No-one involved in the investigation may disclose information that may damage the reputation of persons who may later be found to be innocent of any alleged wrongdoing, or who may successfully apply for name suppression in a court of law. Cases of a sensitive nature are to be dealt with by a restricted team only.

4.4 Suspension of Individual Against Whom an Accusation has been made

If there are reasonable grounds for suspicion of fraud, and to facilitate the investigation, it may be appropriate to suspend an individual against whom an accusation has been made. This decision will be taken by the Anti-Fraud Manager.

4.5 Collecting Evidence

The Anti-Fraud Manager shall take immediate steps to secure physical assets, including computers and any records and all other potentially evidential documents. They will ensure that appropriate controls are introduced to prevent further loss.

At all stages of the investigation the Anti-Fraud Manager will comply with the Police and Criminal Evidence Act 1984.

The Anti-Fraud Manager will maintain detailed records of the investigation. In particular they will keep a record of:

- telephone conversations
- face-to-face discussions
- document reviews
- results of investigations

In addition, the Anti-Fraud Manager will keep, where possible, a record of who has handled each item of evidence, categorising the evidence into the following groupings:

- prime documents
- certified copies
- physical items
- secondary evidence for discussions
- circumstantial

4.6 Investigative Interviews

All interviews shall be conducted in a fair and proper manner in conjunction with the Police and Criminal Evidence Act 1984. Notes of interviews will be taken and retained on the investigation file.

4.7 Further Action

An independent panel of specialist professionals shall be convened to confidentially consider all evidence and reach a conclusion regarding whether fraud or corruption has taken place, and what further action is required.

4.8 Final Reporting

A final report shall be produced providing:



- a description of the incident, including value of any loss, people involved and the means of perpetrating the fraud or corruption (if either has been concluded to have taken place)
- measures taken to prevent reoccurrence
- action needed to strengthen future responses to fraud or corruption, with a follow up report on actions taken (if required)

4.9 Recovery of Losses and Outcome

The Anti-Fraud Manager will be responsible for quantifying the amount of any loss for all fraud / corruption investigation. Repayment of losses will normally be sought and legal advice will be obtained about the options available.

In the event of the discovery of criminal behavior, the police shall be informed.