



COUNTER FRAUD POLICY STATEMENT

Introduction

The size and nature of the services provided by Community Interest Luton (CIL) as with other organisations, puts us at risk of loss due to fraud, theft or corruption. The aim of this policy is to communicate why effective and robust counter fraud arrangements should be in place to ensure the ongoing resilience to the threats of fraud and corruption and a description of the approach that will be adopted by CIL to tackle fraud. This policy will be supported by the Counter Fraud Strategy, to ensure that CIL is not exposed to an unknown, unmanaged or unacceptable degree of fraud risk by protecting themselves in an appropriate way.

Tackling fraud is an integral part of protecting finances. The harm caused by fraud, however, is not just financial. Fraud damages local people and communities, damages the reputation and undermines trust in the services provided. Every pound lost through fraud cannot be spent on providing and delivering quality services that people rely on therefore it is important to have a strong counter-fraud culture and effective counter-fraud measures embedded within its business processes and governance arrangements.

The changing and increasingly complex environment in which we operate, and the complexity of policies, procedures, processes, systems, customer interfaces, legislative requirements, partnerships and joint working arrangements and relationships with other organisations that enable us to deliver our services.

Management are committed to minimising fraud risk and at the same time taking appropriate actions against those who attempt to defraud the organisation, whether from within the organisation or from outside. Refinements to CIL's approach to tackling fraud include a focus on enhanced fraud prevention and detection to improve its resilience to fraud.

Roles and Responsibilities

CIL will continue to support its people to develop the appropriate skills and competencies to enable them to tackle fraud effectively and will recognise financial management as a core management competency.

Management Team (MT)

MT will act as counter fraud champions, tackling fraud from the top down, allocating sufficient resources proportionate to the level of fraud risk to ensure that income is maximised and fostering a strong counter fraud culture.



Corporate Fraud & Compliance Officer

The Corporate Fraud & Compliance Officer will support the management by: leading on the implementation of identified improvement actions; supporting the development and review of the counter fraud policy framework; monitoring that the fraud prevention, detection and investigation processes and procedures are followed; and offering advice, guidance, training and support.

Internal Audit

Internal Audit will review the effectiveness of controls put in place by Management to manage the risk of fraud.

Staff and Volunteers

Staff and Volunteers need to be aware of and adhere to the procedures and practices in place to prevent fraud, theft or corruption when performing their roles, and support those using our services to utilise the whistleblowing process online to report any concerns.

Counter Fraud Management Process

Tackling fraud is not a one-off exercise; it is a continuous process across all parts of CIL because the service delivery processes it underpins are continuous. Tackling fraud is an integral part of good governance within CIL and demonstrates effective financial stewardship and strong financial management.

Reporting

Reporting will include an annual report to MT and the Audit on the progress with implementation of counter fraud management improvement actions and outcomes, and the Annual Governance Statement to the MT and the Audit which will include a statement on the efficacy of counter fraud arrangements.

Budget

All the costs involved are contained within the Management. Any additional costs arising from enhanced counter fraud risk mitigation will have to be considered and prioritised against other pressures in the revenue budget.

Quality Assurance

This policy will be subject to document control, version control, be reviewed at least annually, and be revised to reflect changes in legislation, counter fraud management best practice, and significant changes in corporate governance.



Review

Counter Fraud management policies and procedures will be reviewed on a regular basis to ensure their continued relevance and effectiveness.

Adopted On: 1st June 2017

Last Reviewed: 1st June 2023

Review Date: Annually