

MEV POLICY – VOL 038

Manchester Event Volunteers	Volunteer Services
Policy Number	VOL 038
Policy Title	Anti-Fraud & Corruption

POLICY DESCRIPTION

Fraudulent and corrupt activities

1. We are committed to combating fraud and corruption wherever it may arise in relation to any of the activities involving any paid member of staff, volunteers, contractors or other third parties.
2. We expect volunteers to demonstrate the highest standards of honesty and integrity. This includes compliance with Codes of Conduct, Financial Policies, conditions of service, and any other standards, guidelines or instructions that are relevant to the particular activity.
3. We are committed to establishing and maintaining effective arrangements to prevent fraud and corruption. We do, however, recognise that fraud and corruption cannot always be prevented and effective arrangements have been established to detect and investigate all incidents or situations where fraud and corruption is suspected (see point 5 below).
4. We will not tolerate dishonesty on the part of any volunteer or any persons or organisations involved in any way with the event. Anyone found to be engaged in acts of fraud or corruption will be removed from the workplace and may be subject to disciplinary action by their substantive employer and referral to the police if appropriate.
5. We are committed to creating and maintaining an anti fraud and corruption culture and this includes establishing arrangements which enable volunteers, or other persons, to express concerns and suspicions without fear of repercussions or intimidation and in the knowledge that the information will be treated confidentially and will be investigated promptly and fairly. Suspected corrupt behaviour should be reported to your immediate supervisor or the Volunteer Manager. Where the circumstances are such that you consider it would be inappropriate to report such activities via your supervisor or the Volunteer Manager you may contact the **Independent Fraud Reporting Hotline on 0161 234 7730** in confidence.

EXAMPLES OF FRAUD AND CORRUPTION:

The following are examples of fraudulent or corrupt behaviour. The examples are by no means exhaustive

- a) Accepting cash or an item of value (e.g. Hospitality or a gift) and then allowing a person to enter an area for which they did not have the correct access entitlements.
- b) Taking any assets from a venue without appropriate authority (e.g. new or used equipment, computer-related equipment).
- c) Using assets to run your own business (e.g. computers, motor vehicles).
- d) The intentional distorting of statements or other records which is carried out to conceal the misappropriation of assets, evasion of liabilities or otherwise for gain.
- e) Theft of monies or property.

POLICY IMPLEMENTATION

Anti-Fraud, Corruption and Whistleblowing Guidelines

The Anti Fraud and Corruption Policy applies to all members and employees It also applies to any persons, companies or organisations in relation to their dealings with the event.

For the purposes of this guidance note, Fraud and Corruption are defined as:

Fraud

- **The intentional distorting of statements or other records which is carried out to conceal the misappropriation of assets, evasion of liabilities or otherwise for gain.**
- **Unauthorised use of organisers property.**
- **Theft of monies or property.**

Corruption

- **The offering, giving, soliciting or acceptance of an inducement or reward, which may influence the actions of any person.**

Any volunteer or employee, becoming aware of a potential financial irregularity, should, under normal circumstances, report the situation to his or her line manager as quickly as possible. The manager in turn should report to their Director through the management structure.

The Internal Auditor will advise on and instigate such action as considered necessary for investigating the alleged irregularity taking into account whether the alleged financial irregularity warrants investigation by Internal Audit, whether the Police should be brought in immediately or whether the Department /Venue should conduct it's own investigation.

Reporting Directly to Internal Audit

In certain circumstances it might be appropriate for an employee to report direct to the Internal Auditor e.g. if there were reasons to believe that any subsequent investigation might be compromised if the situation were to be reported through departmental managers. The most likely reasons for reporting direct to Internal Audit would be: -

- **because line managers were implicated in the alleged irregularity and the employee was not sure who it was safe to report to within the Department/Venue**
- **there were reasons to believe that the situation might be suppressed or covered up by senior managers.**

Approach to Adopt in Reporting an Incident

During the process of reporting suspected irregularities there are various criteria which need to be adhered to by any employee or manager involved in the reporting process. These include:

- **Reports of suspected irregularities should be reported through to the Internal Auditor**
- **Allegations must be handled confidentially and discreetly by those managers who are directly involved in the reporting process - any leaking of information may jeopardise subsequent investigations.**
- **As much information as possible must be recorded or collected (without delaying the process) in respect of the allegation - if the information comes from a third party, as much information as possible should be gleaned from the informant and every effort made to ensure that it is possible to make further contact with the informant.**
- **Any records or information relating to the allegation must be secured so that there is no possibility of evidence being lost, destroyed, amended or tampered with.**

Where an allegation of irregularity involves a member of the workforce/volunteers the Investigating Manager, in conjunction with H.R. and/or MEV, must decide whether it is appropriate to suspend the volunteer concerned/remove the individual from the venue.

It is expected that volunteers/employees will be suspended and/or removed from the workplace/venue, in all situations where the employee/volunteer is considered to be guilty of serious misconduct, or by remaining at work, would be in a position to tamper with records or other evidence or where the presence of the employee/volunteer would impede any investigation of the allegation.

Contractor staff found to be engaged in fraudulent or corrupt practices should be referred to their employers.

Conduct of the Investigation

- The Internal Auditor will take whatever steps are necessary, in consultation with the line manager/supervisor and HR/MEV, to investigate the alleged irregularity.
- If there is prima facie evidence that a criminal offence has been committed the situation will be referred to the police. Where appropriate, the Internal Auditor will, in consultation with the Financial Director, assess whether reference to the police is appropriate, on the basis of the available evidence, and will make the formal referral to the police.
- The matter will still remain as an internal issue to be dealt with, in accordance with the appropriate Disciplinary Policy or referral to seconding organisations.

Monitoring, Awareness and Training

The Internal Auditor will be responsible for monitoring the effectiveness of the procedures outlined in this Guidance Note and for amending the procedures as necessary. Directors are responsible for ensuring that their staff are aware of the procedures and that any training needs are addressed (in consultation with the Internal Auditor, if necessary) which may arise from the application of the procedures.

Raising awareness of Anti Fraud and Corruption Policy should form part of the induction training for all employees/members of your organisation.

Whistleblowing

Some allegations may arise as a result of Whistleblowing allegations. However, these allegations may relate to issues other than anti fraud and corruption issues. For example, waste of resources, breaches of Health and Safety or damage to the environment.

The following section outlines the procedures for dealing with Whistleblowing allegations.

Overview

"Whistleblowing" is the term, which has been adopted to describe arrangements, which allow persons, usually employees or volunteers, to express concerns about any types of malpractice, which may be occurring in the work place.

The Whistleblowing Policy does take account of the requirements of the Public Interest Disclosure Act 1998, which aims to protect employees/volunteers who make certain disclosures of information in the public interest.

Whistleblowing arrangements are closely linked to the creation of a culture, which encourages persons to express their concerns without fear of intimidation or recrimination, and in the confident knowledge that any reported concerns will be treated seriously and in confidence, and will be fully investigated.

Whistleblowing arrangements allow for concerns to be expressed outside the normal line management structure, if necessary. One of the important aspects of Whistleblowing is that it enables employees/volunteers to speak out in a situation where it is usually employees most closely involved with the particular service area who are most likely to know if malpractices are occurring. Employees/volunteers are often the first to realise that there may be something seriously wrong within the organisation. However they may feel that expressing their concerns would be disloyal to their colleagues. It may be easier to ignore these concerns rather than report what may just be a suspicion of malpractice. They may also fear harassment or victimisation.

We, therefore, encourage employees/volunteers and others with serious concerns about any aspect of work to come forward and voice those concerns. The 'Whistleblowing Policy makes it clear that employees/volunteers can do so without fear of reprisals or victimisation.

Whistleblowing arrangements also recognise, however, that it is possible that allegations of wrongdoing may be false or malicious. It should be made clear that where staff knowingly make a false allegation that it will be treated as a serious disciplinary offence.

Scope

Internal procedures are in place to enable employees and others to lodge various concerns, and these should normally be followed without recourse to the Whistleblowing arrangements. These concerns cover for example:

- **grievances relating to employees conditions of employment**
- **harassment**
- **equal opportunities**

The Whistleblowing Policy is intended to cover concerns that fall outside the scope of these existing procedures and is aimed at addressing areas relating to possible malpractice or wrongdoing. E.g.

- **any unlawful act, whether criminal or a breach of civil law**
- **waste, abuse or misuse of resources**
- **breach of Code of Conduct for Members of Staff/Volunteers**
- **breach of Policies;**
- **where the health and safety of any individual has been, or is likely to be, endangered**
- **information about any of the above has been, is being, or is likely to be, deliberately concealed.**

A dedicated confidential telephone line already exists for Whistleblowing allegations made to Manchester City Council. That phone number is (0161) 234 7730.

Staff, contractors and volunteers are able to use this existing facility, in exceptional circumstances, where all other reasonable avenues have been exhausted.

The Internal Auditor will keep the Whistleblower informed of developments as appropriate.

POLICY RATIONALE

We are committed to establishing and maintaining effective arrangements to prevent fraud and corruption, and promote a culture, which encourages the highest standards of probity. However, we recognise that fraud and corruption cannot always be prevented and the following effective arrangements have been established to detect and investigate all incidents or situations where fraud and corruption is suspected.