

Canon Collins Trust Anti-Fraud Policy

1 Introduction

The Canon Collins Trust requires staff (meaning staff, trustees and volunteers) at all times:

to act honestly and with integrity and to safeguard the public charitable resource for which they are responsible. The Trust will not accept any level of fraud or corruption; consequently, any case will be thoroughly investigated and dealt with appropriately.

2 Definition of Fraud

The term "fraud" is used to describe such acts as:

- Deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion.

Examples of external fraud:

- Providing false information in applications for Scholarships or hardship payments;
- Submitting bogus/inflated invoices for payment;
- Enticement to reveal bank details or release money urgently (cyber fraud/phishing).

Examples of internal fraud:

- Falsified claims for travel, subsistence or overtime;
- Irregularities in procurement procedures;
- Abuse of flexible working hours.

3 Danger Signs (this list is not exhaustive)

- External emails purporting to be from staff, requesting urgent payment for XYZ;
- Gaps in information supplied by scholars (or conversely, over-elaborate stories);
- Excessive spending by staff using cash, or unusual company credit card activity;
- Inappropriate relationships with suppliers;
- Reluctance of staff to take leave.

4 Mitigation measures

The first principle is that staff or other officers of the Trust may not act alone in making decisions to award grants or make payments. All expenditure other than petty cash (for which there are limits) must be dual-authorized and accompanied by a clear audit trail. Decisions to award scholarships or hardship payments must be authorized by the appropriate sub-committee or by the CEO. The second principle is that there should be a culture of consistent, open and detailed reporting, especially on the use of funds.

5 Avenues for Reporting Fraud

The Trust has in place avenues for reporting suspicions of fraud.

- Staff, if willing, should report such suspicions to the CEO in the first instance especially where it is appropriate or practical.
- At any time, staff may directly contact David Holberton, the Treasurer, who has undertaken a “whistle-blowing” role on behalf of the Trust.
- All matters will be dealt with in confidence and in strict accordance with the terms of the Public Interest Disclosure Act 1998.

6 Responsibilities

All staff must undertake their duties with great care and diligence, ensuring the Trust's financial procedures and policies are properly followed. For example:

- The Finance and Operations Manager should ensure the accounts are up to date, that invoices are fully authorised, that expense claims are supported with receipts etc.
- The Finance and Operations Manager should ensure that purchases are made at the best price and that assets are recorded and equipment safe-guarded.
- The Finance and Operations Manager should ensure donations are promptly and accurately recorded and the Communications Executive should ensure they are acknowledged where required.
- The Scholarships Programme Manager should ensure student applicants for scholarships are genuine and supported by appropriate verification and that course fees and stipends are up to date and correctly paid, and reports received on time.
- Fundraising staff in conjunction with the CEO should ensure that fundraising rules are adhered to; that applications for funds are true and fair; and that donors are kept abreast of developments within projects or at Canon Collins.
- The CEO, South Africa Manager or Fundraising staff should ensure that any grant conditions are adhered to and that the Trust gets regular feedback from projects, including financial reports.
- The CEO has overall responsibility for minimising the risk of fraud by ensuring that staff carry out their duties comprehensively and diligently at all times. The CEO is also responsible for ensuring that an appropriate investigation is carried out in the event of a suspected fraud coming to light, bringing in other resources as necessary.