

# Culture&

## Anti-Fraud Policy

### Policy statement

Culture& is committed to the prevention of fraud and the promotion of an anti-fraud culture.

Culture& operates a zero-tolerance attitude to fraud and requires staff to act honestly and with integrity at all times, and to report all reasonable suspicions of fraud.

Culture& will investigate all instances of actual, attempted and suspected fraud committed by staff, trustees, freelancers, suppliers and other third parties and will seek to recover funds and assets lost through fraud. Perpetrators will be subject to disciplinary and/or legal action.

This policy is endorsed and supported by the Board of Directors and Chief Executive Officer.

### Definition of fraud

The term 'fraud' is commonly used to describe the use of deception to deprive, disadvantage or cause loss to another person or party. This can include theft, the misuse of funds or other resources or more complicated crimes such as false accounting and the supply of false information.

Individuals can be prosecuted under the Fraud Act 2006 if they make a false representation, fail to disclose information or abuse their position.

Culture& has established procedures to encourage staff to report actual, attempted or suspected fraud and/or other forms of illegal activity without fear of reprisal.

### Key responsibilities

The Chief Executive Officer working with the Trustees is responsible for:

- Developing, implementing and maintaining adequate systems of internal control to prevent and detect fraud.
- Regularly reviewing Culture& policy statement and compliance to ensure it remains effective and relevant to the needs of the business.
- Investigating all allegations of fraud and commencing disciplinary and/or legal action where appropriate.
- Reporting to the Board of Directors on all aspects of fraud risk management.

All Staff are responsible for:

- Familiarising themselves with the types of fraud and dishonesty that might occur within their designated work or projects
- Monitoring compliance with internal controls and agreed policies and procedures.
- Notifying their line manager (or other specified person) of any indications of fraudulent activity.

Staff are responsible for:

- Ensuring that Culture& reputation and assets are protected against fraud.
- Reporting known or suspected fraud.
- Assisting in the investigation of suspected fraud.

### **Reporting suspicions**

Staff must report concerns about actual, attempted or suspected fraud to their line manager.

Staff should not attempt to investigate any fraud themselves.

The Public Interest Disclosure Act 1998 protects employees who raise concerns about certain matters of public interest in good faith.

Please refer to Culture& a copy of the Culture&'s *Whistleblowing Policy*.

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