



ANTI FRAUD AND CORRUPTION POLICY

INTRODUCTION

The 9CC Group insists upon the highest standards of honesty and integrity from its trustees, employees, grant applicants and grant recipients.

The Organisation is committed to the prevention of fraud, corruption, bribery and any other forms of dishonesty and this is reflected in the culture of the organisation.

The Organisation operates a zero-tolerance attitude to fraud and corruption and requires any person or party working for or with the Organisation to act honestly and with integrity at all times, and to report all suspicious activities. The Organisation will investigate all suspect activities which it becomes aware of which involve the Organisation's funds or any related activities and where fraud or corruption is discovered, will report matters to the police and to the Office of the Scottish Charity Regulator (OSCR) where necessary.

ANTI FRAUD POLICY

In all matters related to grant awards, payments and grants management, the 9CC Group requires that all of the information provided by grant holders and applicants is accurate and is given in good faith with due care and attention paid to the detail included. This applies to information given in any format including in writing on an application form, over the telephone, verbally during an assessment visit, in progress reports, by email and all other correspondence with the Organisation.

We reserve the right to speak to other grant making Organisations, other funders and other relevant parties in carrying out our due diligence on grant applications before awarding a grant. We also reserve the right to share relevant information in our possession with other funders subject to current data protection legislation.

The discovery of any information being provided fraudulently or not in good faith is likely to result in a grant not being awarded, or a grant which has been awarded being cancelled. Where payments have already been made it is likely we will require funds to be returned. Signatories to grant applications and other grant related correspondence should therefore be aware of their personal responsibility and liability and should take due care to ensure that all information has been verified.

If there is evidence to suggest we have been the subject of a fraud or attempted fraud then we will report the fraud to the appropriate authorities, including the police and OSCR.

Upon detection of fraud or any related criminal activity we will work with the relevant authorities to investigate the incident and to pursue prosecution. In addition, we reserve the right to seek civil recovery of any funds that have not been used for the stated purposes as well as our reasonable costs incurred in our seeking recovery of such funds.

The 9CC Group does not tolerate any form of fraud, corruption or bribery and will therefore take appropriate action against any employee, trustee, grant holder, grant applicant or other external party or person engaged in any such practices whether in a direct attempt to influence the outcome of a grant award or to obtain other favourable treatment.

It is important that employees, trustees or external parties advise the Chief Operating Officer or any Organisation Office Holder if they are aware or suspect that someone might be defrauding or attempting to use inappropriate influence with the 9CC Group or is misusing any Organisation assets or grant that has been awarded by the Organisation. Any such report will be handled in confidence.

RESPONSIBILITIES

In relation to the prevention of fraud, theft, misuse of equipment and abuse of position, specific responsibilities are as follows:

Trustees

The trustees are responsible for establishing and maintaining a sound system of internal control that supports the achievement of the Organisation's policies and objectives.

The system of internal control is designed to respond to and manage the whole range of risks which the Organisation faces. The system of internal control is based on an on-going process designed to identify the principal risks, to evaluate the nature and extent of those risks and to manage them effectively. Managing fraud risk is seen in the context of the management of this wider range of risks.

The Chief Operating Officer

The Chief Operating Officer has overall responsibility for managing the risk of fraud. Their responsibilities include:

- Undertaking a regular review of fraud risks

- The design of an effective control environment to prevent, deter and detect fraud and ensuring that controls are being complied with and systems continue to operate effectively.
- Establishing appropriate mechanisms for:
 - receiving and investigating reports of potential fraud and corruption
 - reporting significant incidents of fraud or attempted fraud to the Board
 - liaising with the police and OSCR when there is evidence of fraud or corruption
- Liaising with the Charity's appointed auditors.
- Making sure that all employees are aware of the Organisation's Anti-Fraud and Corruption Policy and know what their responsibilities are in relation to combating fraud.
- Ensuring that appropriate anti-fraud training is made available to Trustees, employees and those involved in the disbursement of Local Community Funds. as required.

Employees

Every employee is responsible for:

- Acting with propriety in the use of Organisation's resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers;
- Being alert to the possibility that unusual events or transactions could be indicators of fraud;
- Alerting the Chief Operating Officer when they believe the opportunity for fraud exists because of poor procedures or lack of effective oversight;
- Reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events; and
- Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

Partners, Agents and Contractors

The 9CC Group expects all of its partners, agents, contractors and suppliers to act with honesty and integrity and to have appropriate systems in place to minimise the risk of fraud and corruption. The Chief Operating Officer will ensure that terms of reference, agreements and contracts include a clause to the effect that partner organisations, agents and contractors must abide by the Organisation's Anti-Fraud and Corruption Policy and co-operate with fraud investigations initiated by the Organisation.

Approved by the Board

Date 17 August 2023