



Fraud and Bribery Policy

Purpose

The Restoration and Renewal Delivery Authority (DA) is committed to preventing and detecting fraud and bribery and to taking effective action if fraud or bribery is suspected or discovered to have occurred.

Scope

Everyone working on the Programme including DA staff, Board Members, contractors, suppliers, and agency/interim workers (collectively hereafter referred to as 'staff') must adhere to the principles set out in this Policy. The Fraud Act 2006 and the Bribery Act 2010 set out activities and offences of which staff are expected to be aware, as well as the HM Treasury's guide on 'Tackling Internal Fraud'.

Fraud involves the use of deception to gain an unfair advantage, avoid an obligation or cause loss to another party. All references in this Policy include attempted fraud, which is an offence and is regarded with the same gravity as accomplished fraud. Fraud can be perpetrated by people inside and outside the organisation and may or may not involve theft.

Bribery means an advantage offered with the intent to induce improper conduct.

Principles

The SB and DA have zero tolerance for fraud and bribery.

The organisations fulfil their duty to ensure integrity in the use of public money by:

- promoting awareness among staff of the risks of fraud and bribery and their responsibilities with regard to detection and prevention;
- ensuring staff complete their respective Register of Interests forms and abide by the Gifts and Hospitality Policy;
- establishing and maintaining appropriate controls to prevent and detect fraud and bribery;
- investigating actual and perceived cases, and taking effective and corrective action where fraud or bribery is suspected or discovered; and
- identifying risks to which systems and procedures may be exposed and then managing and mitigating those risks in a controlled manner.

Implementation

All staff must adhere to the principles set out in this Policy. In so doing, they must be aware of the prohibitions in the Fraud and Bribery Acts.

- The Fraud Act 2006 covers fraud by false representation; fraud by failing to disclose information; fraud by abuse of position; and fraud by deception.
- The Bribery Act 2010 creates the offences of offering, promising or giving a bribe; requesting, agreeing to receive or accepting a bribe; bribing a foreign public official; and (for an organisation carrying out business) failing to prevent bribery.



Responsibilities of Staff and Line Managers

Everyone has a duty to immediately report an actual or perceived act of fraud or bribery, without fear of intimidation or retaliation. Anyone who suspects fraud or bribery may have been, or has been, committed should act quickly to ascertain what has occurred or is suspected, documenting the details clearly and factually, including names, dates, times, transactions, and all other available details), as well as reporting it. Reports must be made, in confidence, to the employee's line manager, or directly to the Finance Director or the Head of Internal Audit. If this is not possible, the employee should refer to the Whistleblowing Policy.

The individual identifying the actual or potential act of fraud or bribery must not discuss the matter with others. The actual or potential act of fraud or bribery must not be ignored. The individual identified as committing the actual or potential act of fraud or bribery must not be approached or accused. Documentary evidence must not be deleted or removed.

Line managers must not investigate or discuss any matters reported to them with other staff or with the persons under suspicion. They must be responsive and with appropriate sensitivity towards the person making the report, record and document any evidence provided, and promptly refer the matter to their Director or to the Chief Financial Officer.

Responsibilities of Management

The Finance Director is responsible for this Policy and for maintaining the Fraud Risk Register. They investigate all matters, or perceived matters, of fraud and bribery, working with the HR Director, to ensure appropriate sanctions are implemented including, where necessary, reports to the Police.

Training

Everyone working on the Programme is required to complete training and, as part of the induction, to confirm their awareness of what constitutes fraud, bribery and theft. Records of training are kept and monitored.

Review

This policy is reviewed annually, over the life of the Restoration and Renewal Programme, or more frequently if there is a specific legislative, regulatory or service requirement or a change in practice.

David Goldstone

On behalf of the Company

July 2020