

FINANCIAL CRIME PREVENTION POLICY (FRAUD RISK)

Huntingdon Area Money Advice (HAMA) takes the effective prevention and detection of fraudulent activity extremely seriously. Based on the recommendation of the Financial Conduct Authority (FCA) HAMA has adopted the following Fraud Risk Management Policy which is applicable to all volunteers and staff with immediate effect.

Fraud is defined as any intentional act committed to secure unlawful or unfair gain, whether in cash or in kind. Fraud can occur internally or externally – by employees or third parties – and can be perpetrated individually or in collusion with others.

Policy Objective

This policy aims to protect the reputation of HAMA from loss or damage resulting from suspected or confirmed incidents of fraud and/or misconduct. The policy will provide guidance to volunteers & staff, including third parties, on reporting any suspicious activity and handling critical information and evidence.

The Financial Crime Prevention Policy will help to strengthen anti-fraud controls by raising awareness, promoting an open and transparent communication culture, promoting zero tolerance to fraud and misconduct, encouraging all Centre volunteers and staff to report suspicious cases of fraud and/or misconduct.

Types of Fraud

Fraud may involve:

- Willful destruction or loss of assets.
- Bribery.
- Corruption.
- Inappropriate relationships with third parties thereby causing conflict of interest.
- Manipulation, falsification or alteration of client documents without consent.
- Deliberate suppression or omission of the effects of advice from records.
- Disclosing confidential information to third parties without authority.

The HAMA Trustees will implement the policy and shall be responsible for reviewing and taking appropriate actions on all reported cases of suspected fraud/misconduct.

The HAMA Trustees will work to achieve the following:

1. Record all complaints received from volunteers, staff and third parties on suspected incidents of fraud/misconduct.
2. Where it is deemed to be necessary, and especially when a criminal act has been committed, the Police will be informed.

3. In the absence of police involvement, conduct reviews, inspections and investigations to identify the facts/details about the reported incident and identify the perpetrator.
4. Take appropriate disciplinary actions against the perpetrator.
5. Take necessary steps to recover any misappropriated assets.

Escalation protocols

HAMA encourages open and honest communication, and believes in a strong speak-up culture. Any person with knowledge of suspected or confirmed incidents of fraud and/or misconduct, or who is being placed in a position, by another person, to participate in a fraudulent activity, must report the case immediately to the Centre Manager (in person or by e-mail to centremanager@huntsmoneyadvice.co.uk) or if centre manager involved to any trustee.

The HAMA Trustees will make reasonable endeavours to ensure the confidentiality of the complainant's identity, and no person will experience discrimination or unfair treatment as a result of a genuinely-held concern, even if the concern proves to be mistaken. However, disciplinary action may be taken against the complainant if the complaint is malicious.

Disciplinary Action

The HAMA Trustees will determine the disciplinary action to be taken against the perpetrator in the event of a confirmed incident of fraud and/or misconduct. Disciplinary action may involve suspension or expulsion from working at the centre, criminal or civil action, etc.

Client Fraud

HAMA's Code of Practice clearly states that HAMA personnel must not knowingly, aid or abet a fraud committed by a client. Should a fraud be discovered, whether past or present, the Centre Manager must be made aware of this and the appropriate action be taken, including referral to the Police if appropriate. Clients should be made aware that if a fraud is discovered, their case may have to be terminated but each case will be decided on its own merits.

Reviewed by Trustees 26th November 2019