

Anti-Bribery, Fraud, Theft & Corruption Policy

Our Vision

Building better lives through social care and housing in local communities.

Our Mission

We co-design and deliver services that offer innovative social care solutions and support people to thrive.

Our Values

We are
caring and
compassionate



We are
inclusive
and **trusted**



We focus on
excellence
and
innovation



We work in
partnership
and are
one-team



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 **Look Ahead**
CARE, SUPPORT AND HOUSING

1. Introduction

- 1.1 We are an organisation with a strong social purpose. We are trusted by our commissioners and funders to deliver the services we say we will. We behave with integrity and transparency and we are trusted by our customers to deliver on our promises; and by their loved ones to deliver safe and consistently high quality services.
- 1.2 Our Board, senior leaders and staff will:
- be open, honest and transparent when communicating and do what we say we will do, and not make any promises we cannot keep
 - demonstrate personal integrity in line with our organisational values, not merely what is expected and not be afraid to speak up or challenge when something doesn't seem right
 - be accountable for failure as well as success, admitting to mistakes and asking for help to try to put things right
 - be consistent and reliable; someone our colleagues and customers can depend on
 - recognise that building trust takes time, effort and patience, by demonstrating consistency and transparency in what we do as well as the things we say
- 1.3 We know that the vast majority of our employees and people who work with us act with honesty and integrity at all times. However, we also know that there are people who will not act in this way. We will not accept any form of bribery, fraud, theft or corruption and all cases reported to us will be thoroughly investigated and dealt with appropriately in accordance with our Disciplinary Policy.
- 1.4 We recognise that fraud may occur in different ways, both internally and externally or in collusion with others. It may be carried out by senior management, Board Members, staff, consultants, suppliers, contractors or development partners.
- 1.5 This policy and its supporting procedure applies to all Board Members, staff working for and within our organisation, including [fixed term contractors](#), [consultants and contractors](#) and sets out our approach to encouraging them to understand when how to report any concerns they may have about bribery, fraud, theft or corruption.
- 1.6 Everyone must adhere to our legal and contractual obligations and ensure that all procedures and practices remain above reproach. Everyone is clear about their [roles and responsibilities](#) in relation to preventing, detecting and reporting suspicions of bribery, fraud, theft or corruption.

2. Definitions

- 2.1 **Bribery** is described as promising, receiving, soliciting, or giving an inducement for an action which is illegal, unethical or in breach of trust. Inducements can take the form of gifts, fees, rewards or other advantages.

- 2.2 The term **fraud** is used to describe such acts as deception, forgery, extortion, corruption, theft, conspiracy, embezzlement, money laundering, misappropriation, false representation, concealment of material facts and collusions. Fraud can be committed in the following three ways.
- [Fraud by false representation with intent](#)
 - [Fraud by failing to disclose information with intent](#)
 - [Fraud by abuse of position with intent](#)
- 2.3 **Corruption** is the offering, giving, soliciting or acceptance of an inducement or reward that may influence the actions taken by the organisation, its Board Members or employees.

3. Bribery, Fraud, Theft & Corruption

- 3.1 The most common types of fraud, bribery, theft and corruption at Look Ahead affect our customers. Our staff know that they must never lend or borrow money from customers, and it is never OK for staff to use customers' bank cards to pay for things. All incidents of financial abuse of customers by staff will result in disciplinary action and legal action in partnership with the police and may lead to a referral to the DBS.
- 3.2 Actions constituting fraud or corruption may include (but are not limited to):
- Any dishonest or fraudulent act against Look Ahead
 - Forgery or alteration of any document belonging to us
 - Forgery or alteration of any cheque, bank draft or any other financial document
 - Misappropriation of funds, securities, supplies or other assets
 - Money laundering (i.e., the process of making money or assets gained through illegitimate activities appear legitimate)
 - Impropriety in the handling or reporting of money or financial transactions
 - Profiteering because of insider knowledge of our activities
 - Disclosing confidential and proprietary information to outside parties
 - Destruction, removal or inappropriate use of records, furniture, fixtures and equipment
 - Failure to declare an interest
 - Borrowing money from a customer or customers
 - Using a customer's bank card with or without their permission
- 3.3 We have a range of mechanisms in place to prevent and detect bribery, fraud, corruption and theft including our financial procedures and standing orders in addition to obligations set out in law.
- 3.4 Managers are responsible for ensuring that adequate levels of internal checks are included in local protocols to support compliance with this policy and ensuring that appropriate checks are in place.

- 3.5 Our recruitment procedures ensure that we appoint employees on merit and prevents the appointment of unsuitable people. All applicants must complete an application form and declare any criminal convictions that are not spent. All operational employees are subject to a Disclosure and Barring Service ('DBS') police check. We will only appoint employees subject to satisfactory, written, references and who have the right to work in the UK. We conduct documentary checks on all new employees to ascertain their evidence of their right to work in accordance with the Asylum & Immigration Act. All staff are required to sign a Declaration of Interest form at least annually, and as and when new interests become known, in line with our Declaration of Interests Policy and Code of Conduct.
- 3.6 Our Risk Management Strategy (including risk mitigation measures) aims to detect and deter potential bribery, fraud, theft and corruption. Our programme of bribery, fraud, theft and corruption awareness training and regular updates for new and existing staff aims to mitigate the risk of bribery, fraud or corruption taking place.
- 3.7 In referring to this Policy in our quotation/tender documents with suppliers and contractors and our procurement guide, we aim to mitigate the risk of fraud, bribery or corruption taking place.
- 3.8 Our Internal Audit Team are responsible for:
- The independent appraisal of control systems
 - Assisting in the investigation of irregularities
- 3.9 Our external auditor checks that we have suitable and sufficient arrangements in place to prevent bribery, fraud, theft and corruption.
- 3.10 Any person that suspects that bribery, fraud, theft or corruption is/or may potentially be taking place must [notify the Director of Governance and Assurance](#) and Assurance of any suspected or confirmed accounting irregularity, including those affecting cash, stores, property, remuneration or allowance.
- 3.11 Any member of staff, or member of the public, who suspects any instances of bribery, fraud, theft or corruption should [report it immediately](#) to the Director of Corporate Governance and Assurance or through the Whistleblowing procedures to whistleblowing@lookahead.org.uk.

4. Investigations

- 4.1 The Director of Corporate Governance and Assurance will appoint an investigating officer who will be responsible for investigating the allegations of bribery, fraud, theft or corruption in line with our [response plan](#), including:
- Carrying out a thorough investigation with the support of the Director of Corporate Governance and Assurance, as appropriate
 - Gathering evidence, carrying out interviews, taking statements and writing reports
 - Liaising with the Safeguarding Panel and SMT where investigations conclude that the allegation is a serious incident

- Identifying the weaknesses which contributed to the fraud, bribery, theft or corruption; and
 - Making recommendations for remedial action.
- 4.2 The appointed investigating officer will have unrestricted access to all the relevant information and members of staff necessary to carry out the investigation effectively.
- 4.3 The appointed investigator will have completed our Investigation Training e-learning module and any other training we may require from time to time.
- 4.4 All reports of bribery, theft or fraud may be reported to the police by the investigating officer who may:
- Investigate links to offences.
 - Give prevention advice.
 - Advise on any pre-investigation work.
 - Maintain a dialogue with management and/or internal audit during an investigation.

5. Sanctions

- 5.1 There are potential criminal sanctions of up to 10 years imprisonment and/or unlimited fines for individuals who are convicted of bribery offences, and between 7 and 10 years imprisonment if convicted of fraud offences.
- 5.2 Our organisational next steps will depend greatly on the individual cases but may range from:
- A decision to take no further action
 - A recommendation for a disciplinary enquiry or action, up to and including dismissal, where deemed appropriate
 - Further fact finding
 - A recommendation for immediate civil action or referral to the police for a criminal investigation, or both
 - Where appropriate a report will be made to the Audit and Risk Committee and any findings of fraud will be included on our fraud register which is reported annually to the housing regulator.

Record Keeping and Confidentiality

We will comply with our Data Protection and Confidentiality Policy which can be found by clicking [here](#) or visiting our website at www.lookahead.org.uk

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Version History			
Version	Date	Description of Changes	Author
5.0	Dec 2023	Programmed review - no changes	██████████
4.0	July 2022	Updated to confirm procedure, expands on definition of Bribery and Fraud, includes Board Members, Review of for contact details	Deputy Company Secretary