



# Fraud Policy

## Introduction

This document sets out the policies and procedures of the Waterford Sustainable Living Initiative (SLÍ) in case of fraud or dishonesty within the organisation and the steps that must be taken in these practices are discovered or suspected. This policy applies to the Management Committee, Director, Staff (including those participating in a Community Employment Scheme), and Volunteers. SLÍ has a zero tolerance for fraud, is committed to the prevention of fraud and has a number of anti-fraud measures in place. All suspicions of fraud should be reported to the line manager, CEO or Chair of the Board and will be dealt with accordingly in line with this policy and legal commitments.

SLÍ will ensure that all its financial and administrative processes are carried out and reported honestly and transparently, in an efficient and timely manner, within the timelines stipulated in the legislation and that all decisions are taken objectively and free of personal interest.

## Definitions

- **Fraud:** A deliberate intent to acquire money or goods dishonestly through the falsification of records or documents. The deliberate changing of financial statements or other records by SLÍ Committee, staff, or volunteer of SLÍ. The criminal act is the attempt to deceive, and attempted fraud is therefore treated as seriously as accomplished fraud.
- **Theft:** Dishonestly acquiring or disposing of physical or intellectual property belonging to SLÍ or to individual members of the organisation.
- **Misuse of equipment:** Deliberately misusing materials or equipment belonging to SLÍ.
- **Abuse of position:** Exploiting a position of trust within the organisation.

## Prevention Strategies

Committee, staff, and volunteers are expected to lead by example in adhering to policies, procedures and practices. Equally, members of the public, service users and external organisations (such as suppliers and contractors) are expected to act with integrity and without intent to commit fraud against SLÍ in any dealings they may have with SLÍ.

As part of the culture, SLÍ will provide clear routes by which concerns can be raised by committee, staff and volunteers and by those outside of SLÍ. A copy of this policy is available from the SLÍ office and on our website. Senior management are expected to deal promptly, firmly and fairly with suspicions and allegations of fraud or corrupt practice.

## Responsibilities

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

### 1. Management Committee:

The Committee is responsible for establishing and maintaining a sound system of internal control that supports the achievement of SLÍ policies, aims and objectives.

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.

### 2. The Director

Overall responsibility for managing the risk of fraud has been delegated to the Director. His/her responsibilities include:



- » Undertaking a regular review of the fraud risks associated with each of the key organisational objectives.
- » Establishing an effective anti-fraud response plan, in proportion to the level of fraud risk identified.
- » The design of an effectively controlled environment to prevent fraud.
- » Establishing appropriate mechanisms for:
  - Reporting fraud risk issues
  - Reporting significant incidents of fraud or attempted fraud to the Management Committee;
- » Liaising with SLI's appointed Auditors.
- » Making sure that all staff are aware of the Fraud Policy and know what their responsibilities are in relation to combating fraud.
- » Ensuring that appropriate action is taken to minimise the risk of previous frauds occurring in future.

### 3. Staff and Volunteers

Every member of staff or volunteer is responsible for:

- » Acting with propriety in the use of SLI resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers.
- » Conducting themselves in accordance with integrity, objectivity, accountability, openness, honesty, and leadership.
- » Being alert to the possibility that unusual events or transactions could be indicators of fraud.
- » Alerting the Director when they believe the opportunity for fraud exists e.g. 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.
- » Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

### Detection and Investigation


The Chair of the Management Committee must be notified immediately of all financial or accounting irregularities or suspected irregularities or of any circumstances which may suggest the possibility of irregularities including those affecting cash, stores, property, remuneration or allowances.

Reporting of suspected irregularities is essential as it:

- » Facilitates a proper investigation by experienced staff and ensures the consistent treatment of information regarding fraud and corruption.
- » When so notified, the Chair will instigate an investigation by appointing a designated officer, auditor or other adviser.
- » The designated officer, auditor or other advisor will:
  - Deal promptly with the matter.
  - Record evidence received.
  - Ensure the security and confidentiality of evidence.
  - Work closely with staff and other agencies, such as the Police and Courts to ensure that all issues are properly investigated and reported upon.
  - Ensure maximum recoveries are made on behalf of SLI and assist in the implementation of disciplinary procedures where considered appropriate.
- » Malicious accusations may be the subject of disciplinary action.



The Fraud Policy will be reviewed in June 2025, or as soon as practicable after there has been a material change in any matter to which the statement refers.

Signed:  (John Hawkes, SLI Board Chair)

This policy was approved by SLI's Management Committee, June 2023.