

# Anti-Fraud and Corruption Policy

## Introduction

LRWA complies with applicable legislation, including the Fraud Act 2006, the Bribery Act 2010, and with other regulatory requirements and applicable guidance including Managing Public Money. LRWA is committed to conducting business fairly, openly and honestly and in accordance with the highest ethical and legal standards.

## Scope

This Policy applies all 'Direct Contacts' with LRWA including and not exclusive of; members, people going through training, freelancers working on behalf of LRWA, directors and board members.

## Policy Statement

LRWA has a 'zero tolerance' policy towards fraud, bribery and corruption. This means that the LRWA:

- does not accept any level of fraud, bribery or corruption within the organisation or by any other individual or organisation receiving LRWA funds or representing the LRWA; and
- will always seek to take disciplinary and/or legal action against those found to have perpetrated, be involved in, or assisted with fraudulent or other improper activities in any of its operations.

LRWA is committed to developing an anti-fraud culture and keeping the opportunities for fraud, bribery and corruption to the absolute minimum.

LRWA requires all direct contacts to act honestly and with integrity at all times and to safeguard the resources for which they are responsible.

## Risk and internal control systems

LRWA will seek to assess the nature and extent of its exposure to the risks of internal and external fraud, bribery and corruption. It will regularly review these risks, using information on actual or suspected instances of fraud, bribery and corruption to inform its review.

LRWA will seek to put in place efficient and effective systems, procedures and internal controls to: encourage an anti-fraud culture; prevent and detect fraud, bribery and corruption; and reduce the risks to an acceptable level.

LRWA will make all those receiving LRWA funds or representing the LRWA aware of this policy.

LRWA will regularly review and evaluate the effectiveness of its systems, procedures and internal controls for managing the risk of fraud. It will do this through risk management and assurance processes and audit arrangements.

### Reporting

All direct contacts must immediately report any suspected or actual instances of fraud, bribery or corruption. This includes offers to pay bribes, solicitation of bribes and demands to make facilitation payments. Failure to report could result in disciplinary action.

LRWA also requires all those receiving LRWA funds or representing the LRWA to report to any suspected or actual instances of fraud, bribery or corruption involving LRWA assets or direct contacts.

LRWA will not penalise anyone for raising a concern in good faith, even if it turns out to be unfounded.

LRWA will fully meet its obligations to report fraud, bribery and corruption to third parties. The Fraud Response Plan sets out: the parties that suspected or actual fraud, bribery or corruption must be reported to; the nature and timing of the disclosure required; and who is responsible for making the report.

### Definitions

Fraud is knowingly making an untrue or misleading representation with the intention of making a gain for oneself or another or causing a loss, or risk of loss, to another.

Bribery is giving or offering someone a financial or other advantage to encourage that person to perform their functions or activities improperly, or to reward someone for having already done so.

A facilitation payment is a type of bribe. An example is an unofficial payment or other advantage given to a public official to undertake or speed up the performance of normal duties.

Corruption is the misuse of entrusted power for personal gain. This would include dishonest or fraudulent behaviour by those in positions of power, such as managers or government officials. It would include offering, giving and receiving bribes to influence the actions of someone in a position of power or influence, and the diversion of funds for private gain.

A conflict of interest is where an individual has private interests that may or does influence the decisions that they make as a direct contact or representative of an organisation.