InterACT Church and Community Partnership: Anti-Fraud and Financial Ethics Policy
Reviewed 2026

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Introduction

This document sets out the policy and procedures of InterACT against fraud and other forms of dishonesty. It applies to trustees, staff and volunteers. Anybody associated with InterACT who commits fraud, theft or any other dishonesty, or who becomes aware of it and does not report it, will be subject to appropriate disciplinary action.

Statement of intent

InterACT will continually strive to ensure that all its financial and administrative processes are carried out and reported honestly, accurately, transparently and accountably and that all decisions are taken objectively and free of personal interest. We will not condone any behaviour that falls short of these principles.

All members of InterACT have a responsibility for putting these principles into practice and for reporting any breaches they discover.

Scope

a) 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 either a member of the public, someone who works or is a volunteer for InterACT. The criminal act is the attempt to deceive, and attempted fraud is therefore treated as seriously as accomplished fraud.

b) Theft:
Dishonestly acquiring, using or disposing of physical or intellectual property belonging to InterACT or to individual members of the organisation.

c) Misuse of equipment:
Deliberately misusing materials or equipment belonging to InterACT for financial or material benefit.

d) Abuse of position:
Exploiting a position of trust within the organisation for financial or material benefit.

Culture

InterACT fosters honesty and integrity in its entire team. trustees, 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 the Charity.

As part of this, InterACT will provide clear routes by which concerns may be raised by trustees, staff and volunteers. Details of this can be found in the InterACT Staff Handbook and on their website.
Senior management are expected to deal promptly, firmly and fairly with suspicions and allegations of fraud or corrupt practice .

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Response and Investigation

Once a report is made, the Trustees will:

1. Initiate the Fraud Response Plan immediately.
2. Secure any evidence (documents, emails, system access).
3. Notify the Charity Commission (Serious Incident Report) and Action Fraud, if required.

Review

The Trustees will review this policy regularly and no longer than every three years to ensure it remains effective and reflects any changes in our operations or common fraud threats.

Responsibilities

a) Trustees:

The trustees are responsible for establishing and maintaining a sound system of internal control that supports the achievement of the Charity's policies, aims and objectives.

The system of internal control is designed to respond to and manage the whole range of risks which the Charity faces.

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.

b) Project Manager

Overall responsibility for managing the risk of fraud has been delegated to the Project Manager to act on behalf of the trustees.

Their responsibilities include:

- Undertaking a regular review of the fraud risks associated with the charity's activities
- Establishing an effective anti-fraud response plan, in proportion to the level of fraud risk identified
- The design of an effective control environment to prevent fraud
- Establishing appropriate mechanisms for:
  reporting fraud risk issues
  reporting significant incidents of fraud or attempted fraud to the trustees
- Liaising with the Charity's appointed Auditors.
- Making sure that all staff are aware of the InterACT's Anti-Fraud Policy and know what their responsibilities are in relation to combating fraud

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- Ensuring that appropriate anti-fraud training is made available to trustees, staff and volunteers as required
- Ensuring that appropriate action is taken to minimise the risk of previous frauds occurring in future
- Ensuring that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively
- Preventing and detecting fraud as far as possible
- Assessing the types of risk involved in the operations for which they are responsible
- Reviewing the control systems for which they are responsible regularly
- Ensuring that controls are being complied with and their systems continue to operate effectively
- Implementing new controls to reduce the risk of similar fraud occurring where frauds have taken place.

c) <u>Staff</u>

Every member of staff is responsible for:

- Acting with propriety in the use of InterACT's resources and the handling and use of funds, whether they are involved with cash, receipts, payments or dealing with suppliers
- Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty and leadership
- Being alert to the possibility that unusual events or transactions could be indicators of fraud
- Alerting their manager 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 event
- Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

d) <u>Volunteers</u>

Every volunteer is responsible for:

- Acting with propriety in the use of the InterACT's resources and the handling and use of funds, whether they are involved with cash, receipts, payments or dealing with suppliers
- Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty and leadership
- Being alert to the possibility that unusual events or transactions could be indicators of fraud
- Alerting their manager 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
- Co-operating fully with whoever is conducting internal checks or reviews or fraud investigations