

RENEWABLE WORLD ANTI-FRAUD POLICY

Version 1.0 of the policy approved by the Renewable World Board on 20th November 2018.

1. INTRODUCTION

This document sets out the policy and procedures of Renewable World against fraud, theft and other related forms of dishonesty, together with the steps that must be taken where any of these practices are suspected or discovered.

It applies to Trustees, staff, volunteers and those working for the Renewable World as consultants, interns or temporary employees, thereafter referred to as “Personnel”. Anybody associated with Renewable World who commits fraud, theft or any other dishonesty, or who becomes aware of it and does not report it, will be subject to appropriate action.

2. STATEMENT OF INTENT

Renewable World 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 personnel have a responsibility for putting these principles into practice and for reporting any breaches they discover.

3. 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 either; a member of the public, or Renewable World personnel. The criminal act is the attempt to deceive and attempted fraud is therefore treated as seriously as accomplished fraud.

Theft:

Dishonestly acquiring, using or disposing of physical or intellectual property belonging to Renewable World or to individual members, supporters, donors, partners or beneficiaries of Renewable World.

Misuse of Equipment:

Deliberately misusing materials or equipment belonging to Renewable World or intended for use in projects delivered by Renewable World and its partners.

Abuse of Position:

Exploiting a position of trust within the organisation.

RENEWABLE WORLD ANTI-FRAUD POLICY

4. CULTURE

Our culture is intended to foster honesty and integrity and is underpinned by our Global Code of Conduct. Trustees, staff and volunteers are expected to lead by example in adhering to the Charity's policies, procedures and practices. Equally, our partners and external organisations (such as suppliers and contractors) are expected to act with integrity and without intent to commit fraud against the Charity in any dealings they may have with us.

As part of the culture, the Charity will provide clear routes by which concerns can be raised by Trustees, staff and volunteers and by those outside of the Charity. A copy of the Charity's whistleblowing policy is available to personnel, service users, suppliers and other third parties.

Senior management are expected to deal promptly, firmly and fairly with suspicions and allegations of fraud or corrupt practice.

5. RESPONSIBILITIES

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

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 that 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.

The Chief Operating Officer (COO):

Overall responsibility for managing the risk of fraud has been delegated to the COO. The 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 effective control environment to prevent fraud.
- Establishing appropriate mechanisms for:
 - reporting fraud risk issues
 - reporting significant incidents of fraud or attempted fraud to the Board of Trustees;
 - liaising with the auditors where appropriate.

RENEWABLE WORLD ANTI-FRAUD POLICY

- Making sure that all staff are aware of the Charity's Anti-Fraud Policy and know what their responsibilities are in relation to combating fraud;
- Ensuring that appropriate anti-fraud training is made available to Trustees, staff and volunteers as required; and
- Ensuring that appropriate action is taken to minimize the risk of previous frauds occurring in future.

Senior Management Team:

The Senior Management Team is responsible for:

- 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;
- Regularly reviewing the control systems for which they are responsible;
- Ensuring that controls are being complied with and their systems continue to operate effectively; and
- Implementing new controls to reduce the risk of similar fraud occurring where frauds have taken place.

Staff and Volunteers:

Every member of staff or volunteer is responsible for:

- Acting with propriety in the use of the Charity's 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 the values and behavior principles set out above and in the Renewable World Global Code of Conduct;
- 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; and
- Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

RENEWABLE WORLD ANTI-FRAUD POLICY

6. INTERNAL REPORTING

All personnel should report suspicions to their line Manager, unless conflicted or expected to be involved, then the COO COO@renewable-world.org or if conflicted the Chair Chair@renewable-world.org.

Reportees will be covered by the protections and confidentiality stated within the RW Whistleblowing Policy provide reports are a genuine concern and have been made in good faith. Please refer to RW's Whistleblowing Policy or contact the Company Secretary cosecretary@renewable-world.org

7. DETECTION AND INVESTIGATION

Whilst having regard to the requirements of the Data Protection legislation, the Charity will actively participate in an exchange of information with external agencies on fraud and corruption where necessary. It is often the alertness of Trustees, staff or volunteers and the general public to the possibility of fraud and corruption that leads to detection of financial irregularity.

The Chair of the Board of Trustees (chair@renewable-world.org) and the COO (coo@renewable-world.org) 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 or COO 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 senior managers of the Charity 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 the Charity and assist the senior managers to implement the Charity's disciplinary procedures where considered appropriate (referral to the Police will not prohibit or restrict action under the Disciplinary Procedure).

RENEWABLE WORLD ANTI-FRAUD POLICY

In cases of suspected payroll irregularities where a fraud investigation may be possible, discussion will occur between the Chair and the CEO if it is thought a disciplinary investigation is more appropriate.

Malicious accusations may be the subject of disciplinary action.

8. DISCLOSURE AND REPORTING

The COO (or if conflicted, another member of the Senior Management Team) shall inform the Chair of Trustees of such reports of suspicions in confidence (unless the reportee has reason to believe that the Chair may be implicated in which case they shall inform the Vice-Chair or Treasurer). The Chair or their deputy shall fulfil the Charity Commission reporting requirements.

9. AWARENESS/TRAINING

An important contribution to the continuing success of an anti-fraud strategy, and its general credibility, lies in the effectiveness of programmed awareness/training, of personnel throughout the organisation.

This will be achieved through the development of both induction and awareness training for all personnel involved in internal control systems to ensure that their responsibilities and duties in this respect are regularly highlighted and reinforced.

10. REVIEW

This policy will be reviewed on an annual basis.

All approved Renewable World policies can be found on the HR Folder in Dropbox as follows:
\Dropbox (Renewable World)\RW Human Resources (HR)\HR policies. They are all found on our website footer at www.renewable-world.org