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Anti-Fraud and Bribery Policy

Approved: 14th September 2024

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Mr Mervyn Cross, Mr Gary McIndoe, Ms Zeinab Mohammed, Canon Professor Nicholas Sagovsky

PART I

1. Scope of this Policy

1.1 This policy applies to all relevant persons of RAPAR. Relevant persons includes staff, Trustees, volunteers and short-term contractors.

1.2 Part I includes sections that are useful for and made available to all relevant persons and are publicly available.

1.3 Part II includes sections that are used for the board and leadership team in responding to allegations and incidences of fraud and building an anti-fraud culture.

2. Definitions of Corruption, Fraud, and Bribery

2.1 Definitions of corruption, fraud, and bribery are included in this policy.

2.2 It is also bribery to make unofficial payments (known as 'grease' or 'facilitation' payments) to a public official to secure or speed up a routine action to which you may feel entitled to. For example, you pay a public official a small "fee" to speed up the issuing of a visa.

2.3 Some examples of fraud and bribery relevant to are described in this policy.

3. Zero Tolerance on Fraud or Bribery

3.1 RAPAR's position on fraud and bribery is to take a zero-tolerance approach, and we are committed to pursuing this approach throughout operational practices for the following reasons:

- RAPAR recognizes the significant risk that fraud and bribery pose to achieving its aims and objectives. Any money that is lost to fraud or bribery is money that cannot be used to accomplish our mission.
- Corrupt behavior also seriously damages our reputation. The eradication of fraud and bribery in the way we operate is greatly important to securing our stakeholders' trust.

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- Corruption creates unstable societies. It destroys public and business standards and forces ordinary people to use ill-advised resources in their interactions with the government and other public bodies.

3.2 All members of staff and the board, together with volunteers and contractors, are required to sign the zero-tolerance declaration form during induction and annually after that.

3.3 We support the application of the zero-tolerance policy by providing:

- Direction and rules to establish appropriate and expected behaviour.
- Effective deterrents to inappropriate behaviour in the form of meaningful consequences.
- Prevention measures to reduce the risk of fraud or bribery occurring.
- Detection measures to identify fraud or bribery if it happens, including whistle-blower lines.
- Response measures to ensure we react well to suspicions, allegations, and proven incidents of fraud and bribery, including protection and fair treatment for the accusers and accused.
- Measurement processes to evaluate the impact and success of our anti-fraud and bribery policy and management of risk.
- Deliberate proactive steps to embed anti-fraud & bribery thinking into our culture, including staff training and awareness.

3.4 Anyone found guilty of fraud or bribery will be subject to disciplinary measures, which ordinarily include dismissal, prosecution, and recovery of losses.

4. Anti-Bribery Policy

4.1 RAPAR employs all legal and safe tactics to avoid and resist paying bribes to public officials, even if it results in denials, delays, inconvenience, and increased cost to our operations.

4.2 No person is authorized to pay a bribe on behalf of RAPAR or use funds for this purpose.

4.3 Individuals are not expected to resist bribery to the point of putting themselves or others at real risk of personal harm or injury. A payment under such circumstances is considered extortion rather than bribery.

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5. Conflicts of Interest

5.1 A conflict of interest exists where an employee or a Trustee has an interest, relationship, or friendship which could, or could be seen to, interfere with their ability to decide an issue in the best interests of RAPAR.

5.2 The purpose of this policy is to ensure that all conflicts of interest are declared, declared conflicts are managed to mitigate the associated risks, and that decisions and actions are documented to ensure transparency and accountability.

5.3 Examples of conflicts of interest include (but are not limited to):

- Relationships between Trustees and any member
- Relationships between Trustees and suppliers, donors, grantees, beneficiaries, or job applicants.
- A 'relationship' in this context could include family, romantic relationships, being a bank signatory, advisor, or Trustee.

5.4 The existence or discovery of a conflict of interest does not constitute a breach of policy as long as it is disclosed promptly.

5.5 All Trustees are required to make annual conflict of interest declarations using the form.

5.6 Trustees are required to disclose conflicts of interest as soon as they arise, or the Trustee becomes aware of the conflict of interest. An example of such disclosures would include a potential supplier presented to the procurement committee is a company where a committee member is a Trustee.

5.7 The recruitment conflict of interest declaration form should be signed by all relevant persons involved in the development or design of selection tools, those with access to the selection tools, and those involved in the selection process. It should be signed as soon as all the applications are received and before any short listing.

5.8 The Procurement Committee meeting agenda should always include a clear listing of all suppliers on the approved suppliers list, and all who have provided quotes for the purchases under consideration. All members present should be required to declare that they have no interests in any of the suppliers under consideration at that meeting, and this should be recorded in the minutes.

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5.9 If a conflict arises or is discovered, it should be immediately declared.

5.10 Appropriate actions should be taken to resolve the conflict of interest, which may be temporary or permanent, for example:

- A Trustee should be removed from a particular supplier selection decision in which they are conflicted.
- A conflicted Trustee should be removed from all aspects of the recruitment and selection process.

5.11 Steps should be taken to manage the conflict of interest and mitigate the risk of conflicted decision taking should be documented on the declaration form.

6. Gifts and Entertainment

6.1 Gifts and entertainment should never be used or allowed to influence RAPAR decision-making by Trustees.

6.2 When offers of gifts and entertainment are made or accepted in situations where they are inappropriate, they can look like, or may be, bribes. They can expose us to accusations of unfairness or even break the law and can put our reputation for ethical behaviour at risk.

6.3 We should be able to accept and make offers of gifts and entertainment ONLY when they are appropriate, i.e., when they:

- are proportionate in the context; and
- do not create any sense of expectation or obligation on the recipient or the giver.

6.4 The following gifts may never be offered or accepted and will always be deemed inappropriate.

- Cash of any amount
- Any gift with a value exceeding £30
- Any entertainment worth more than £100
- Any gifts or loans from existing suppliers or prospective suppliers while a tender process is underway
- Any gifts or loans to Trustees involved in supplier selection decisions
- Entertainment involving gambling, anything of a sexual nature, or exploitation of others.

6.5 It is never allowed to request a gift or entertainment.

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6.6 Gifts or entertainment below the limits above are not necessarily appropriate. In some circumstances, an element of judgment is required to decide whether a gift is appropriate or not

6.7 The following circumstances imply the giving or receiving of a gift or entertainment offer may be appropriate:

- The giving and receiving of the gift or entertainment strengthens a genuine business relationship.
- The gift or entertainment does not constitute an attempt to apply undue influence and does not create an undue obligation.
- The gift or entertainment is given or accepted in the open rather than in secret.
- The gift or entertainment is given to celebrate a recognized cultural event or holiday.
- The gift or entertainment is given to the organization or a group (department) rather than an individual.
- The gift or entertainment is branded marketing materials (pens/notebooks etc.).
- The value of the gift or entertainment is not excessive or abnormal in a social context.
- The timing of the gift or entertainment is not suspicious.

6.8 The following circumstances imply the giving or receiving of the gift or entertainment may be inappropriate:

- The timing, nature, or circumstances of the gift means it could be perceived as an attempt to influence a business decision
- The value of the gift is excessive in the circumstances (despite being below the limit).
- The receiver feels obligated, or the giver feels entitled.
- The gift is given or received in secret.

6.9 If any Trustee or volunteer is offered an inappropriate gift, they should politely decline it and inform their line manager or board chair.

6.10 In the event that declining an inappropriate gift in the moment might be culturally inappropriate or embarrassing, it should be returned within no less than a week, with appropriate documentary evidence to prove that the gift was returned.

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6.12 In the event that an inappropriate gift is received publicly, steps should be taken to restore the organization's reputation, in addition to returning the gift.

6.13 In the event that inappropriate gifts are received without consent (such as courier deliveries, bank, or mobile money transfers), these should be declared immediately using the conflict-of-interest declaration form. Steps should be taken to return the gift or notify authorities if money laundering is suspected.

6.14 Inappropriate gifts received by employees and subsequently declared should not be received into the organization's funds – rather they should be returned in all cases. Appropriate gifts, given to the organization as a whole, or to a particular team, should normally be enjoyed or shared by all relevant staff members (e.g., gift basket or flowers). Where an appropriate item is not easily sharable, it should be raffled off by random and transparent means.

7. Speaking Up

7.1 RAPAR's policy on speaking up is designed to build confidence to report genuine concerns about fraud, bribery, or other types of misconduct. For many cases of misconduct, someone reporting it is the only way it can be discovered and dealt with.

7.2 A genuine concern is sincerely felt and based on information the reporting person believes to be true or trustworthy. Upon further investigation, a genuine concern may or may not turn out to be true. The motivation of the person reporting a genuine concern is not relevant to its definition as a genuine or not.

7.3 A false accusation is when the reporting person knowingly fabricates information or reports information, they know to be false.

7.4 RAPAR has zero tolerance to anyone who is found to have wilfully and deliberately abused a speaking up process to make false accusations. Appropriate disciplinary measures will be taken.

7.5 A genuine concern should be reported when there is evidence or a strong suspicion of misconduct in any of the following areas:

- Fraud or bribery
- Harassment
- Any illegal act.

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7.5 Concerns may be reported, either in person or by email to a Trustee.

7.6 All relevant persons should report genuine concerns. They should report as much detail as possible, including who, when, where, and how and whether they have evidence for the basis of their suspicion.

7.8 Concerns may be reported anonymously, but people are encouraged to give their name and/or contact details. It is easier to investigate allegations when follow-up questions with the reporting person is possible.

7.9 Information about the speaking up process will be made available as widely as possible.

8. Supporting Reporting Persons

8.1 RAPAR has zero tolerance to any form of retaliation against reporting persons (also known as 'whistle-blowers').

8.2 All relevant persons who report genuine concerns will be properly protected and supported.

8.3 Details of any allegations or suspicions raised should be recorded on a Fraud, Bribery, and Misconduct report form and submitted to the Chair or Secretary of the Board, whichever person is most appropriate.

8.4 RAPAR commits to taking the support of whistle-blowers seriously by:

- Taking care not to underestimate or disregard the risk that a reporting person may be exposed to, or the level of fear or anxiety they may be experiencing.
- Appointing someone with responsibility to support the reporting person (the 'support person').
- Providing the support person with relevant information to share with the reporting person
- Assuring the reporting person that their concern is being handled and taken seriously.
- Explaining that their identity will be protected to every extent possible but cannot be guaranteed.
- Answering questions as appropriate and providing emotional support but not sharing confidential information with the reporting person.
- Informing the person of any decision to investigate or not, investigation outcome, and actions taken as appropriate.

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- Taking necessary steps to ensure the safety of any reporting person, even if there is a cost implication, in cases where the person experiences or fears retaliation or harassment.

PART II

9. Fraud Response Team

9.1 Once a concern has been reported or otherwise identified, the responsibility to respond to that allegation will fall to the Fraud Response Team.

9.2 The Fraud Response Team will be convened by the Chair of the Trustees or a Trustee if the Chair is involved. The Fraud Response Team should comprise of three individuals from the Board of Directors/Trustees. Any relevant person implicated in an allegation may not be a member of the Fraud Response Team.

9.3 The roles and responsibilities of the Fraud Response Team are to:

- Update the Fraud & Bribery Register
- Document meetings, decisions, and learning
- Maintain confidentiality, especially concerning the reporting person and the person accused of alleged misconduct Ensure the reporting person is supported and protected from harm
- Take urgent steps to protect assets or information as needed
- Communicate with donors and manage other internal and external communications as appropriate
- Make preliminary investigations
- Decide whether or not to conduct a full investigation
- Set up the Terms of Reference and/or contract for the investigation
- Act on the findings of the investigation

9.4 The Fraud Response Team will use the checklist as a reference of the issues to consider when responding to an allegation of misconduct.

9.5 A case file should be opened to hold all emails, meeting minutes, reports, and other information relevant to the case. The file should be held in a safe and secure place.

9.6 All reported or otherwise identified allegations, suspicions, or concerns should be brought to the attention of the Board. It is imperative to maintain

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confidentiality whilst providing updates about actions taken until the issue is closed.

10. Reporting Fraud and Bribery to Donors

10.1 The Fraud Response Team's duty for communicating with donors should include the following actions:

- Appoint a donor contact person to channel all communication with the donor with respect to the suspected fraud or bribery.
- Consult the donor agreement concerning the terms and conditions about reporting suspected fraud or bribery and ensure that they are met. If in doubt, communicate within 48 hours if the fraud may impact a particular donor's funds.
- Protect the identity of the suspect and reporting person. Avoid sharing any confidential details.
- Reassure the donor by explaining the process being followed to handle the allegation.
- Confirm verbal communications in writing.
- Keep the donor updated with progress and the outcome of the investigation

10.2 The full investigation report or disciplinary report should not be shared with the donor unless required to do so, and if so, only in an anonymous form.

10.3 Fraudulent losses that donors disallow can only be financed from unrestricted funds.

11. Conducting Investigations

11.1 The purpose of investigating is to gather evidence and facts to establish whether suspicions or allegations are true, and whether any proven incidents are isolated or more widespread.

11.2 All investigations should be impartial, thorough, timely, and confidential.

11.3 Any relevant persons investigated will be considered innocent until proven guilty. False or mistaken accusations are not uncommon.

11.4 All reported allegations or suspicions of misconduct should normally be investigated. This includes cases where:

- There is a belief that the genuine concern may have been reported due to malicious motives.

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- The allegation relates to attempted fraud or bribery.
- The accused person has since left the organisation

11.5 The Fraud Response Team may decide not to investigate in exceptional cases where a reported allegation or suspicion:

- Is frivolous, trivial, or has clearly arisen from a misunderstanding.
- Is wholly unbelievable, i.e., there is no conceivable way the facts it related to could have occurred.
- If there is insufficient information to investigate.

11.6 Investigations may be carried out by in-house staff, an internal auditor (which may be an outsourced function), an audit firm, donor, or a specialist investigation firm, depending on the case.

11.7 Investigators should be objective and unbiased, thorough, able to maintain confidentiality, competent in investigative techniques, empowered with sufficient seniority and confidence, honest, and independent of any possible subsequent disciplinary process.

11.8 The Fraud Response Team should set clear terms of reference for the investigator including background, allegations made, the scope of investigation, and the timeline for expected work and reports.

11.9 Care should be taken not to compromise evidence. This may include:

- Two full backups of hard drives/electronic files – one copy left untouched and the other used for the investigation.
- Keeping documents in the files they were filed in, and in the order they were filed in. If documents are removed, take a note of where they were located.
- Adding hole punches to or writing comments on documents that may be admitted as evidence.
- Considering fingerprint contamination if appropriate.

11.10 The following factors should be considered when deciding whether or not to suspend members:

- Could the member's presence result in the risk of loss or damage to evidence, influencing witnesses, or interfering with the investigation in any way?
- Would the impact on other members or operations be excessive?
- Are there laws regarding the maximum length of any formal suspension?

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- Have other alternatives been considered, such as requiring them to take leave?

11.11 The legal and other rights of interviewees should be considered when conducting interviews during an investigation. This may include ensuring that:

- All interviews are completely and accurately documented.
- There is a complete ban on coercion or coercive techniques.
- The assistance of a translator is provided if necessary
- The date, time, and location of interviews are, unless required, within office hours.
- The interviewees' wish or right to have a witness or lawyer present is respected as appropriate.

11.12 A formal documented investigation report should be submitted to the Fraud Response Team, according to the agreed timing, which outlines the case's findings, facts, and conclusions.

11.13 The investigation report should make recommendations about weaknesses. It should avoid making any recommendations associated with disciplinary consequences.

12. Reporting and Acting on Findings of Investigations

12.1 The Fraud Response Team will agree on the appropriate actions to be taken in light of the findings of an investigation.

12.2 Once receiving the investigation report, the Fraud Response Team may choose to take the following actions, as appropriate to the case:

- Take legal advice
- Organize appeal hearings in accordance with disciplinary policy in case of individuals' appeal.
- Clear the reputations of those accused but found innocent of wrongdoing.
- Recover losses from individuals
- Make improvements to internal control systems to ensure that similar frauds do not happen again
- Implement recommendations from investigation report
- Communicate with donors, members, and public as necessary
- Discuss with donors with respect to the treatment of fraudulent losses, making a repayment if required.
- Initiate the revision of budgets and cash flow forecast

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12.3 All decisions and actions of the Fraud Response Team shall be documented and filed on an incidence file.

12.4 A one-page summary of the case (allegation, response, and outcome) should be prepared, shared with the Trustees, and filed on the front of the incidence file.

13. Induction, Training, and Awareness

13.1 All relevant persons should receive training in the following elements (starred items at induction):

- Definitions of fraud and bribery, with relevant examples
- Relevant sections of this policy (zero tolerance, conflicts, gifts, speaking up)
- Reporting suspicions
- What to report
- How to report
- Confidentiality and protection
- Signing declarations (code of conduct, conflict of interest, zero tolerance, etc)
- Zero tolerance principle
- Building confidence to report by explaining key steps of how reported suspicions are handled, e.g., Fraud Response Team commissions fair and unbiased fact-finding investigation, and appropriate action taken.

13.2 In addition, the following topics should be covered:

- What to do if someone reports a suspicion to you
- Maintaining confidentiality
- Supporting and protecting people who speak up
- Communication with donors, staff, public, suspect/s, and the reporting person
- Roles and responsibilities of the Fraud Response Team
- Documentation (incidence report and fraud register)
- Investigations
- Actions to take after an investigation

13.3 Refresher training will be organized for all staff at least every two years.

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13.4 Day-to-day awareness of anti-fraud and bribery culture will be encouraged by the following:

- item on Leadership Team meeting agenda as necessary

14. Disciplinary Process

14.1 Where evidence of fraud or bribery is discovered, RAPAR's disciplinary policy should be followed.

15. Grievance Process

15.1 If any RAPAR member feels they have been treated unfairly during a fraud or bribery response, they may take recourse in line with the Grievance Policy.

16. Contracts

16.1 All contracts should include a clause that allows RAPAR to terminate the agreement with immediate effect if a person commissioned to do work commits any act of gross misconduct, including fraud, bribery, or theft.

16.2 The following clauses should include:

- We will provide quotations at best value when requested.
- We will accept payment by cheque or bank transfer.
- We will not offer or pay any incentive to the NGO or its officers, to win bids to supply goods or services, or as personal gifts or loans.
- We will not provide quotations in return for favour or payment from the NGO or its officers

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Appendix

Appendix I - Glossary Terms

| Term | Definition |
|-----------------------------------|--|
| Attempted fraud or bribery | An unsuccessful effort to commit fraud or bribery. |
| Bribery | The unlawful act of offering or receiving any gift, loan, fee, reward, or other advantage (taxes, services, donations etc.) to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of one's duties. |
| Corruption | The abuse of entrusted power for private gain. |
| Embezzlement | To steal money that people trust you to look after as part of your work. |
| Entertainment | Invitations to attend events with a social aspect, such as meals and conferences, and entertainment events including shows or games, which are offered free of charge or at reduced rates. |
| Error | An accidental mistake, for example, in a calculation or a decision. |
| Extortion | Act of utilizing one's access to a position of power or knowledge, either directly or indirectly, to demand unmerited cooperation or compensation due to coercive threats. |
| Fraud | The act of intentionally deceiving someone in order to gain an unfair or illegal advantage (financial, political, or otherwise). |
| Gift | Goods, services, or cash offered to or by staff or board members, or their friends, family, or associates, at free or preferential rates. |

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| | |
|-------------------------|--|
| | Unpaid loans are considered gifts for the purposes of this policy. |
| Money Laundering | The concealment of the origins of illegally obtained money, typically by means of transfers involving foreign banks or legitimate businesses. |
| Negligence | Failure to give care or attention, especially when this causes harm or damage. |
| Nepotism | Form of favouritism based on familial relationships whereby someone in an official position exploits his or her power or authority to provide a job or favour to a family member, even though he or she may not be qualified or deserving. |
| Public Official | Any person holding legislative, executive, administrative, or judicial office, whether he/she is appointed or elected, permanent or temporary, paid or unpaid. |
| Robbery | The crime of taking money or property illegally, often by using threats or violence. |
| Theft | The crime of stealing. |

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Appendix II – Annual Conflict of Interest Declaration Form

This form should be completed each year by all Trustees and Directors

Your name:

Your role:

I understand that a conflict of interest arises if an employee or a board member has an interest, relationship, or friendship that could, or could be seen to, interfere with their ability to decide an issue in the best interests of RAPAR.

I understand that the existence of a conflict of interest does not constitute a breach of policy, so long as it is declared, so that it may be properly managed.

I have been shown a list of current board members, RAPAR Leadership members, suppliers and partners, which is attached to this declaration.

I hereby declare that I have no known personal or business relationships or interests with any other Leadership member, board member, current supplier, or contractor, except for:

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| Name | Nature of relationship |
|------|------------------------|
| 1. | |
| 2. | |
| 3. | |

I further declare that I have not and will not provide any assistance, favour, or guidance to any applicant during the selection process.

Name:

Sign:

Date:

The signed form should be filed on the recruitment file, with a copy on the above-named staff member's personal file.

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Appendix III – Recruitment Conflict of Interest Declaration Form

This form should be completed by anyone involved with access to the relevant recruitment selection tools or involved in the selection process.

Position being recruited:

Your name:

Your role in the selection process:

I hereby declare that I have been shown a complete list of the applicants for the above position and that I do not personally know any of them except for:

| Name | Nature of relationship |
|------|------------------------|
| 1. | |
| 2. | |
| 3. | |

Signed:

Date:

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Appendix IV – Declaration of Conflict of Interest Form

This form should be completed by any member, Trustee or Director who becomes aware of a conflict of interest arising during the course of the year. It should be filed as soon as the individual becomes aware of the conflict.

Name:

Role:

I understand that a conflict of interest arises if a member, Trustee or Director has an interest, relationship, or friendship that could, or could be seen to, interfere with their ability to decide an issue in the best interests of RAPAR. I understand that the existence of a conflict of interest does not constitute a breach of policy, so long as it is declared, so that it may be properly managed.

I hereby declare the following conflict of interest:

| | |
|--------------------------------|--|
| Name of person or Organization | |
| Nature of conflict | |
| Date conflict arose | |

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Appendix V – Fraud, Bribery, and Misconduct Report Form

The information contained within this form is **highly confidential**. *Only authorized persons* should have access to the form and the information recorded here. This form *must* be securely stored.

This form should be completed by a senior Leadership Team member or Trustee who has received a report about suspicion of fraud, bribery, or misconduct.

| | |
|---|--|
| Date report made: | |
| Who reported (name and job title): | |
| Date/s of incident/s triggering suspicion: | |
| Nature of suspicion: | |

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| | |
|-------------------------------------|--|
| Suspect (name and job title) | |
| Evidence/witnesses (if any) | |
| Estimate of Loss | |
| Other relevant information | |

Completed by:

Role:

Signature:

Date:

Received by Chair of Trustees:

Signature:

Date:

The information contained within this form is **highly confidential**. *Only authorized persons* should have access to the form and the information recorded here. This form *must* be securely stored.

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Appendix VI – Allegation or Concern Response Checklist

| | |
|---|---|
| The Fraud Response Team is responsible for deciding the appropriate course of action on a case-by-case basis, in line with the policy. This checklist is a reference only. Issues to consider: | ✓ |
| 1. Obtain relevant facts from the reporting person | |
| 2. Re-assure the reporting person their concern will be handled in confidence | |
| 3. Document details on standard fraud incidence report | |
| 4. Inform a Trustee or Director | |
| 5. Record incidence in Fraud Register | |
| 6. Convene the Fraud Response Team | |
| 7. Ensure urgent safeguarding of assets / evidence | |
| 8. Decide whether to investigate | |
| 9. Obtain legal advice (if necessary) | |

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| | |
|---|--|
| 10. Communicate with the Trustees | |
| 11. Communicate with the donor (if required) | |
| 12. Communicate with, and consider rights of, the accused | |
| 13. Communicate with the reporting person | |
| 14. Communicate with members or the public (if necessary) | |
| 15. Decide on whether or not to suspend member | |
| 16. Provide support to reporting person | |
| 17. Appoint and engage investigator with clear terms of reference | |
| 18. Conduct investigation | |
| 19. Take corrective action to right any wrongs in this incident | |
| 20. Take preventative action to prevent similar incidents occurring in the future | |
| 21. Document and act on any learning from the case | |

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Anti-Fraud and Bribery Policy

Appendix VI – Fraud and Bribery Register

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Mr Mervyn Cross, Mr Gary McIndoe, Ms Zeinab Mohammed, Canon Professor Nicholas Sagovsky

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Fraud and Bribery Register

STRICTLY CONFIDENTIAL

| Complete after first meeting of Fraud Response Team | | | | | Complete after investigation | | | | |
|---|---------------------|--------------------|--------------------------------|---------------------------------|------------------------------|------------------------|------------------------------------|--------------------------|--------------------|
| Method of discovery/report form number | Nature of suspicion | Donor(s) informed? | Members of Fraud Response Team | Will there be an investigation? | Who conducted investigation? | Investigation outcomes | Estimated loss? Was loss recorded? | Corrective action taken? | Donor(s) informed? |
| | | | | | | | | | |
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