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| <b>Title</b>            | <b>Fraud, Theft &amp; Anti-Bribery Policy</b>  |
| <b>Purpose</b>          | <p>Members and employees are expected to act with honesty and integrity and to lead by example in adhering to regulations, procedures and practices.</p> <p>In addition, members of the public, clients and external organisations (such as suppliers and contractors) are expected to act with integrity and without intent to commit fraud against the Association in any dealings they may have with the Association.</p> <p>The Association will provide clear routes by which concerns can be raised by both Members and employees, and by those outside the service.</p>   |
| <b>Scope</b>            | <p>The policy applies to all Board and Committee members and members of staff whether employees of MHA, freelance, casual or temporary agency staff irrespective of grade, position or length of service. All have a responsibility for fraud and theft prevention and detection and for ensuring that any attempts at bribery are identified and action taken.</p>  |
| <b>Definitions</b>      | <p>For the purposes of this policy, unless otherwise stated, the following definitions shall apply:</p> <p><b>Fraud:</b> defined as the use of deception with the intention of obtaining an advantage, avoiding an obligation or causing loss to another party.</p> <p><b>Theft:</b> defined as the dishonest appropriation of property or value committed by Association Board, staff or contractors in the course of their work.</p> <p><b>Bribery:</b> defined as the offering, giving, receiving, or soliciting by Association Board, staff, contractors or another party of something of value for the purpose of influencing the action of another in the discharge of his or her duties</p> |
| <b>Policy Statement</b> | <p>Fraud, theft and bribery fall into four main categories:</p> <ul style="list-style-type: none"> <li>• theft, the misappropriation or misuse of assets for personal benefit;</li> <li>• bribery and corruption;</li> <li>• false accounting and/or making fraud and fraudulent statements with a view to personal gain or gain for another: for example falsely claiming overtime, travel and subsistence, other expenses, sick leave or special leave (with or without pay);</li> <li>• unauthorised access to computer materials;</li> <li>• externally perpetrated fraud and theft against an organisation.</li> </ul>  |

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|                     | <p>Maryhill Housing Association is committed to preventing fraud, theft and bribery from occurring and to developing an anti-fraud and theft culture. To achieve this, the Association will:</p> <ul style="list-style-type: none"> <li>• Institute and maintain cost effective measures and procedures to deter fraud.</li> <li>• Take firm and vigorous action where appropriate against any individual or Organisation perpetrating fraud or theft against the Association.</li> <li>• Encourage employees and Board to be vigilant and to report any suspicion of fraud or theft, and provide suitable channels of communication and ensure sensitive information is treated appropriately.</li> <li>• Rigorously investigate instances of alleged fraud or theft and pursue perpetrators to seek restitution of any asset fraudulently obtained together with the recovery of costs.</li> <li>• Assist the police and all other appropriate authorities in the investigation and prosecution of those suspected of fraud.</li> <li>• Developing a culture where whistleblowing is encouraged and whistleblowers are supported – in line with the Association’s Whistleblowing Policy</li> <li>• Adhere to its Sustainable Procurement Policy and scheme of delegation for payment approvals</li> <li>• Ensure staff are fully trained in the Association’s Fraud Policy, Procedures, Sustainable Procurement Policy and Scheme of Delegation.</li> </ul> <p>Information on how to deal with fraud, theft and bribery is contained within the relevant Procedure accompanying this Policy.</p> |
| <b>Approval</b>     | Maryhill Housing Board<br>23 <sup>rd</sup> August 2018   |
| <b>Policy Owner</b> | Director of Resources  |
| <b>Review</b>       | Maryhill Housing Association’s Audit & Risk Committee will review this policy every three years. Actual or potential fraud will be reported to the Audit and Risk Committee on a quarterly basis.  |