



## **ANTI-FRAUD POLICY AND PROCEDURE**

### **Policy Statement**

The NHS Retirement Fellowship is committed to the prevention of fraud and the promotion of an anti-fraud culture.

The NHS RF operates a zero-tolerance attitude to fraud and requires staff, trustees and members of the Fellowship engaged on NHS RF business to act honestly and with integrity at all times, and to report all reasonable suspicions of fraud.

The Fellowship will investigate all instances of actual, attempted and suspected fraud committed by the above named individuals and will, where appropriate, seek to recover funds lost to the Fellowship through fraud. Perpetrators may be subject to appropriate action, including legal action.

### **Definition of fraud**

The term 'fraud' is commonly used to describe the use of deception to deprive, disadvantage or cause loss to another person or party; or secure unwarranted personal gain.

Examples include (but are not limited to) falsely claiming academic and other achievements, submitting false documentation, falsely claiming expenses, failing to repay payments an individual is not otherwise entitled to.

Individuals can be prosecuted under the Fraud Act 2006 (England, Wales and Northern Ireland) if they make a false representation or fail to disclose information or abuse their position.

### **Key responsibilities**

The NHS RF is responsible for:

- Investigating all allegations of fraud and pursuing appropriate action, including legal action.
- Developing, implementing and maintaining adequate systems of internal control to prevent and detect fraud.
- Ensuring that the NHS RF's reputation and assets are protected against fraud.
- Reporting to the Board of Trustees on all aspects of fraud risk management including known or suspected fraud.
- Assisting in the investigation of suspected fraud.
- Monitoring compliance with internal controls and agreed policies and procedures.

### **Reporting suspicions**

Those suspecting actual, attempted or suspected fraud should report their concerns in the first instance to the Chief Executive. Individuals should not attempt to investigate any fraud themselves.

The Chief Executive will investigate and provide a report on the evidence gathered within 21 days, or as soon as practicable thereafter, to the Chairman of the Trustees and the Chairman of the Audit, Risk and Investment Sub Committee. The Chairman of the Board of Trustees, in consultation with the Chairman of the Audit, Risk and Investment Sub Committee will normally decide, within 7 days, whether any further action is required, and together with the Chief Executive shall be responsible for recommending to the Board of Trustees the introduction of any change in procedures, or action against any individual.

Where any complaint is wholly or partially upheld, the Chief Executive shall provide a report on this, and the actions taken as a result, to the next meeting of the Board of Trustees.

In the event that any complaint or suspicion should rest on the Chief Executive, then the initial approach may be made to the Chairman of the Board of Trustees.

Date policy adopted:.....

Signed: .....  
Chairman of the Board of Trustees