



**The British  
Psychological Society**

Promoting excellence in psychology

## ANTI FRAUD POLICY

For use by	All Society employees; Members of the Society involved in Society activities; agents, consultants and contractors acting for the Society.
Owner	Director of Finance
Date of Approval by PC	24 April 2012
Dates of Trade Union Consultation and Negotiation	5 October 2012
Date of Approval by JNC	5 October 2012
Date of Trade Union Ballots	
Launch Date	January 2013
Contact – Comments	Personnel Department
Review Date	First year review, then every three years. (2014/2017)

## 1. Introduction

- 1.1. The British Psychological Society is committed to the prevention, deterrence, detection and investigation of all forms of fraud and corruption. In this policy the term fraud also includes corruption.
- 1.2. There is no precise legal definition of fraud. However, the Institute of Internal Auditors define it as: *'Any illegal acts characterised by deceit, concealment or violation of trust. These acts are not dependent upon the application of threat of violence or of physical force. Frauds are perpetrated by parties and organizations to obtain money, property or services; to avoid payment or loss of services; or to secure personal or business advantage.'*
- 1.3. Whilst there are obvious frauds involving theft of assets or the misappropriation of funds, the following are also examples of the types of activity that could and should also be regarded as fraudulent:
  - Manipulation or misreporting of financial information;
  - Misuse of assets;
  - Deception, e.g. misrepresentation of qualifications to obtain employment;
  - Failure to declare a conflict of interest;
  - Offering or accepting bribes or inducements from third parties;
  - Conspiracy to breach laws or regulations;
  - Fraudulent completion of official documents (e.g. VAT returns to HM Revenue and Customs, Companies House returns);
  - Theft from a customer or supplier;
  - Claims for expenses not incurred legitimately;
  - Theft of intellectual property (e.g. unauthorised use of name or logo, or theft of customer data).
- 1.4. The Society seeks to reduce the opportunity for fraud, and will take prompt action to investigate fully and address any suspected cases.
- 1.5. This Policy should be read in conjunction with the Anti Fraud Procedure and the policies and procedures outlined in 7.1.

## 2. Aims

The aims of the Anti-Fraud Policy are:

- 2.1. To ensure that those covered by the Policy are aware of the Society's position on fraud and the consequences of committing fraud.
- 2.2. To underpin a culture of honesty and integrity.

- 3.1. The Policy applies to all staff, including agency staff, Members undertaking activities on behalf of the Society, and agents, consultants and contractors acting for the Society.

## **4. Principles**

- 4.1 The Society will operate an Anti-Fraud Policy consistently, in line with the prevailing legal requirements, to ensure that the Society demonstrates and maintains a zero tolerance approach to fraud.
- 4.2 The Society is committed to protecting staff and its Members by ensuring that appropriate policies and procedures are applied.
- 4.3 The action and conduct of staff, Members and others acting on behalf of the Society are essential to maintaining standards. To that end, all Society staff and Members, including agents, consultants and contractors as well as suppliers involved in Society business must read, become familiar and comply with this Anti-Fraud Policy.
- 4.4 This Policy should be read in conjunction with the other relevant policies outlined in 7.1.
- 4.5 This Policy must be complied with. The Board of Trustees are responsible for setting and reviewing this policy and for ensuring that any changes to this Policy are effectively communicated to all of those covered within the scope of this Policy.
- 4.6 The Society will support those covered within the scope of this Policy through guidance, training and further information as required. Staff and Members are encouraged to contact the policy contact if they have any queries regarding the Anti-Fraud Policy.

## **5. Policy Statement**

- 5.1. The Society expects all those to whom this Policy applies to act honestly and with integrity and to safeguard the Society resources for which they are responsible.
- 5.2. The Society will not accept any level of fraud or corruption and will treat any such matter with the utmost seriousness.
- 5.3. Each case of alleged fraud will be thoroughly investigated and dealt with appropriately. Investigations may invoke the Disciplinary Policy or Member Conduct Rules and could result in dismissal or removal from Society membership. In the case of contractors, agents or consultants acting for the Society, investigations could lead to immediate termination of a contract.

- 5.4. It is the responsibility of all staff and relevant Members to read and be familiar with the contents of this policy and any related procedures, and to identify and notify the Society of any suspected cases of fraud or fraud risk.

## **6. Investigating an allegation of fraud – procedure**

- 6.1. The Anti Fraud Procedure details the procedures to be followed on discovering fraud.
- 6.2. Repayment of any loss through fraud will be sought where it is considered appropriate to do so. It is the policy of the Society to adopt such a response and legal advice will be sought.
- 6.3. The Society will report serious and/or illegal acts of fraud to the police and the Charity Commission.
- 6.4. If fraud is discovered, the Society will take steps to minimise the risk of similar frauds occurring in future.

## **7. Related policies**

- 7.1 This policy should be read in conjunction with the:
- Whistleblowers Policy
  - Anti-Fraud Policy
  - Expenses Policy \*
  - Financial Procedure and Internal Control Manual \*
  - Gifts and Hospitality Policy
  - Disciplinary Policy and Procedures \*
  - Declaration of Interests Policy and Procedures
  - Anti-Money Laundering Policy
  - Member Conduct Rules

***\* update/approval ongoing***