

Fraud Policy

1. Introduction

This document sets out the policy and procedures of HCPC or HCPTS against fraud, and other forms of dishonesty and supplements the Anti Bribery Policy.

It applies to Directors, employees, contractors, interims, agency staff, Council & Committee members and partners. Anybody associated with HCPC or HCPTS who commits fraud, theft, or any other dishonesty, or who becomes aware of it and does not report it, will be subject to appropriate disciplinary action.

2. Statement of intent

HCPC or HCPTS 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 members of HCPC or HCPTS have a responsibility for putting these principles into practice and for reporting any breaches they discover. Fraud or attempted fraud by those employed or contracted to HCPC may result in disciplinary action up to and possibly including dismissal and/or referral to the police.

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, someone who works (in any capacity) or is a partner for HCPC or HCPTS. 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 HCPC or HCPTS or to individual members of the organisation.

Misuse of equipment: Deliberately misusing materials or equipment belonging to HCPC or HCPTS for financial or material benefit.

Abuse of position: Exploiting a position of trust within the organisation for financial or material benefit.

4. Culture

HCPC or HCPTS fosters honesty and integrity in its entire employees and members. Directors, employees, Council & Committee members and partners are expected to lead

by example in adhering to policies, procedures and practices. Equally, members of the public, service users and external organisations (such as suppliers and contractors) are expected to act with integrity and without intent to commit fraud against the HCPC.

As part of this, HCPC or HCPTS will provide clear routes by which concerns may be raised by Directors, employees, and members and partners. Details of this can be found in the HCPC's Fraud Response Policy. Alternatively, email bribery&fraud@hcpc-uk.org

Senior management are expected to deal promptly, firmly and fairly with suspicions and allegations of fraud or corrupt practice. HCPC may use the 'Serious Event Report' process which can be found on the Quality Management System.

5. Responsibilities

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

Council members and ELT:

The Directors are responsible for establishing and maintaining a sound system of internal control that supports the achievement of the HCPC's policies, aims and objectives.

The system of internal control is designed to respond to and manage the whole range of risks which the HCPC 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.

Audit Committee will approve such measures on an annual basis.

Chief Executive Officer

Overall responsibility for managing the risk of fraud has been delegated to the CEO. The day-to-day responsibility has been delegated to the Chief Information Security and Risk Officer (CISRO) to act on behalf of the CEO.

Their 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 Chair of Audit and Risk Assurance Committee;
- Liaising with the HCPC's appointed Auditors.

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

Executive Leadership Team (ELT) and Senior Leadership Group (SLG)

The Executive Leadership Team and Senior Leadership Group are 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;
- Reviewing the control systems for which they are responsible regularly;
- Ensuring that controls are being complied with and their systems continue to operate effectively;
- Implementing new controls to reduce the risk of similar fraud occurring where frauds have taken place.

Employees and Council or Committee members

All employees and Council or Committee members are responsible for:

- Acting with propriety in the use of HCPC's resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers;
- Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty and leadership;
- 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.

Partners

Every partner is responsible for:

- Acting with propriety in the use of the HCPC's resources and the handling and use information and of funds whether they are involved with cash, receipts, payments or dealing with suppliers;
- Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty and leadership;
- 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.

6. Review

This policy will be reviewed by ELT and agreed by the Audit & Risk Assurance Committee on a bi-annual basis or if there is a significant change in the appropriate areas of law.