



POLICY FOR REDUCING THE RISK OF FRAUD

Bowls England is committed to reducing and managing the risk of fraud.

It aims to:

- Prevent, detect and respond to fraud, corruption or money laundering risk in the company business;
- Identify, assess and manage reputation and investment risk in its' partners and joint ventures;
- Develop and implement risk-based strategies to reduce financial crime risk;
- Introduce fraud response plans and other measures (eg whistle-blowing), to reduce the impact of financial crime;
- Investigate incidents of suspected loss, fraud or other impropriety and locate misappropriated assets;
- Achieve compliance with the UK's regulatory financial crime requirements and obligations;
- Manage relationships with regulators, suppliers and third parties.

What is Fraud?

There is no precise legal definition of fraud and no single criminal offence that can be called fraud. It is usually taken to involve theft (the removal of cash or assets to which the fraudster is not entitled) or false accounting (the falsification of alteration of accounting records or other documents).

- It is necessary to be vigilant to external fraud, perpetrated by individuals outside of Bowls England;
- It is necessary to be vigilant to internal fraud – perpetrated by Management, Directors or staff;
- It is necessary to be vigilant to collusion, between someone within Bowls England and an outsider.

FORMAL FRAUD POLICY

- To take appropriate measures to deter fraud;
- To introduce/maintain necessary procedures to detect fraud;
- To investigate all instances of suspected fraud;
- To report all suspected fraud to the appropriate authorities;
- To assist police in the investigation and prosecution of suspected fraudsters;
- To recover from fraudsters any assets wrongfully obtained;
- To encourage persons to report any suspicion of fraud.

Bowls England will integrate into the overall management programme, fraud prevention.

Key elements of a fraud prevention strategy and its implementation should include:

- Identifying the areas within Bowls England most vulnerable to the risk of fraud;
- Identify extra or alternative controls needed to reduce the risk;
- Monitoring the controls to check that they are in operation;
- Regularly assess the effectiveness of the controls, in particular to take account of the changing circumstances in Bowls England;
- Screen new staff via a Fidelity Guarantee/Insurance process;
- Ensure the strategies put in place are workable and practical and supported by appropriate resources and regularly reviewed.

Action when Fraud is detected within Bowls England.

- An investigation will be led by the Chief Executive, Chair, Vice Chair, Finance Director and Office Manager. It may be necessary to invite external expertise in fraud investigation.
- Secure evidence without alerting the suspect fraudster at the outset.
- Minimise any further fraud by removing the responsibility which led to vulnerability of the situation.
- If necessary, suspend the culprit until investigations are concluded.
- Re-assessment of systems and procedures to take place immediately.