



Bowls England: Anti-Fraud Policy

Introduction

Bowls England upholds a strict anti-fraud stance, with a zero-tolerance approach toward fraudulent activities. All staff, contractors, volunteers, and third-party personnel are encouraged to report suspicions of fraud without fear of reprisal. This policy outlines the procedures for detecting, preventing, and responding to fraud.

Culture

Bowls England promotes an anti-fraud culture rooted in honesty and integrity, with a zero-tolerance policy that emphasises the importance of transparency in preventing, detecting, and investigating fraud.

Definitions

- **Fraud:** Any intentional act or omission using deception to cause loss, including financial fraud, asset misappropriation, corruption, and data fraud. Disciplinary actions may include termination and prosecution under the Fraud Act 2006.
- **Theft:** Dishonestly acquiring, using, or disposing of property belonging to Bowls England or its members.
- **Misuse of Equipment:** Deliberately misusing Bowls England materials or equipment for personal gain.
- **Abuse of Position:** Exploiting a position of trust within the organisation for personal or financial gain.

Roles and Responsibilities

- **Board Directors:** Ensure sound internal control systems supporting Bowls England's policies and objectives.
- **The Audit Committee:** Assure the Board that reasonable steps are taken to prevent fraud.
- **Chief Executive (CE):** Oversees anti-fraud training and disciplinary actions and ensures legal compliance.
- **Finance Manager:** Develop and monitor financial policies and processes.
- **Senior Leadership Team:** Promotes ethical behaviour and implements effective controls.
- **Internal Audit:** The Finance Manager or an appointed investigation team secures evidence and prevents further losses during investigations.
- **Staff and Volunteers:** Expected to comply with policies and procedures, use resources responsibly, report suspicions of fraud, and cooperate fully with investigations.

Post-Event Action

Following a fraud event, Bowls England will review and strengthen systems to prevent recurrence, documenting lessons learned and recommending improvements.



Prevention and Detection Controls

Preventative measures include regular audits, reconciliations, separation of duties, fraud awareness training, and thorough background checks for new hires.

Whistleblowing Policy

Our whistleblowing policy encourages reporting of dangerous, unlawful, or unethical conduct, with protections against reprisals for whistleblowers.

Policy Review

The Anti-Fraud Policy is reviewed annually. Any suspected fraud is reported to the police.

2. Fraud Reporting Process

If fraud is suspected, follow these steps:

1. **Report Concerns:** Staff or volunteers should report suspicions to their line manager, the CE, or the Bowls England Chair.
2. **Initial Fact-Finding:** Line managers should verify facts within 24 hours and review related documents.
3. **Secure Evidence:** If fraud is confirmed, secure all evidence immediately to prevent further losses.
4. **Notify Finance Manager:** For internal fraud, the Finance Manager will determine the next steps and may appoint an independent audit team.
5. **Immediate Suspension:** Suspend involved individuals and secure laptops and documents to prevent tampering.
6. **External Fraud Response:** For suspected external fraud, the CE and HR Team will seek legal or police advice.

Bowls England is committed to fostering an ethical culture to protect the organization, its members, and the community from fraud.

3. Procurement Principles (see Procurement Policy for Further Information)

To prevent fraud and ensure ethical sourcing, Bowls England commits to the following procurement principles:

- **Transparency:** Conduct all procurement processes openly, ensuring clear documentation and accountability.
- **Fair Competition:** Select suppliers through a fair, unbiased process, assessing all bids on merit and value.
- **Due Diligence:** Conduct background checks on all suppliers to verify legitimacy and alignment with Bowls England's values.
- **Separation of Duties:** Divide procurement responsibilities to prevent fraud, with different individuals responsible for decision-making, purchasing, and approval.
- **Compliance with Procurement Policy:** Adhere strictly to Bowls England's Procurement Policy, observing pre-approved spending limits and documentation requirements.



4. Cash Handling Policy

Introduction

Bowls England ensures secure, transparent, and accountable cash handling to prevent theft and fraud. This policy applies to all employees and volunteers involved in cash transactions.

Scope

Covers all cash transactions, including membership fees, event fees, and donations.

Principles

- **Security:** Cash must be secured at all times, stored in a locked safe or drawer, and counted discreetly in secure areas.
- **Accountability:** Only authorised personnel handle cash, with clear transaction records maintained and reconciled regularly.
- **Transparency:** Record all cash transactions immediately, issuing receipts with details of the amount, source, and purpose.

Roles and Responsibilities

- **Finance Manager:** Oversees cash handling and authorisations, conducts audits and addresses discrepancies.
- **Authorised Personnel:** Follow cash handling procedures and maintain accurate records.
- **Staff and Volunteers:** Comply with cash handling procedures and report issues promptly.

Procedures

- **Cash Collection:** Only designated individuals collect cash, with receipts issued for each transaction.
- **Cash Storage:** Secure cash in a locked safe, and balance collections daily.
- **Cash Deposits:** Deposit cash daily or at the earliest opportunity, maintaining deposit records.
- **Cash Reconciliation:** Daily reconciliation of cash on hand against transaction records.
- **Cash Transfers:** Only authorised transfers between individuals, recorded in a log signed by both parties.

Training and Compliance

Training on this policy is mandatory, with violations subject to disciplinary action.

Review and Audit

The Cash Handling Policy is reviewed annually, with regular audits to ensure compliance and improve practices.



5. Service Contract Review Principles

Introduction

Regular review of service contracts ensures quality, cost-effectiveness, and alignment with Bowls England's needs.

Principles for Service Contract Review

- **Value for Money:** Assess cost-effectiveness through cost-benefit analysis and market comparisons.
- **Performance Evaluation:** Review SLAs and KPIs to ensure service providers meet standards.
- **Compliance and Risk Management:** Ensure compliance with laws and Bowls England policies, identifying and mitigating risks.
- **Contract Flexibility:** Allow for adjustments to terms and termination options as needed.
- **Cost Control and Transparency:** Track contract costs, ensuring transparency and fair payment terms.
- **Relationship Management:** Maintain regular communication with providers, encouraging feedback and issue resolution.
- **Review Frequency:** Annual reviews of all contracts, with mid-term assessments for long-term agreements.

Roles and Responsibilities

- **Finance Manager and Head of Business Operations:** Keep a record of all service contracts and their end dates, ensuring timely review. Lead reviews, gather data, and ensure contracts meet Bowls England standards.
- **Service Users:** Provide feedback on performance.
- **Senior Management:** Approve renewals, modifications, or terminations.

Documentation and Record-Keeping

Document all contract reviews, retaining records for future reference.

Bowls England's approach to service contracts ensures quality, cost efficiency, and support for organisational goals, fostering strong partnerships.

Bowls England's policies and principles reinforce our commitment to transparency, accountability, and ethical practices, helping to safeguard organisational resources and build trust among members, staff, and stakeholders.