

## **Pimlico Toy Library (PTL)**

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## **COUNTER FRAUD & SECURITY MANAGEMENT POLICY**

This statement sets out Pimlico Toy Library's policy on fraud and our responsibilities for its prevention.

The Pimlico Toy Library requires staff and volunteers at all times to act honestly and with integrity, and to safeguard the resources for which they are responsible. Fraud is an ever-present threat to these resources and hence must be a concern of all members of staff and volunteers.

#### What is Fraud?

The term fraud is used to describe a whole range of activities such as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. Generally, fraud involves the intention to deceive a person or organisation in order to obtain an advantage, avoid an obligation, or cause loss.

The term also includes: the use of information technology equipment to manipulate programmes or data dishonestly; the theft of IT equipment and software; and, the intentional misuse of computer time and resources.

### Pimlico Toy Library's Attitude to Fraud

Pimlico Toy Library takes the most serious view of any attempt to commit fraud by members of staff volunteers, contractors, or employees and agents acting on behalf of Pimlico Toy Library. Staff involved in impropriety of any kind will be subject to disciplinary action, including prosecution, if appropriate. Pimlico Toy Library treats attempted fraud as seriously as accomplished fraud.

# Responsibilities

Pimlico Toy Library is committed to:

- Developing and maintaining effective controls to help prevent or detect fraud;
- Carrying out vigorous and prompt investigations if fraud occurs;
- Taking appropriate disciplinary and/or legal action against perpetrators of fraud;
- Taking disciplinary action against managers where their failures have contributed to the commission of the fraud.

Every employee or volunteer of Pimlico Toy Library:

 Has a duty to ensure that public funds, the Pimlico Toy Library's reputation and its assets are safeguarded;

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- Should alert their line manager or the Chair of Trustees where they believe the opportunity for fraud exists because of poor procedures or lack of effective supervision;
- Has a responsibility to report details of any suspected or actual fraud, or any suspicious acts or events, to their line manager or the Chair of the Trustees. Alternatively, you could use the Pimlico Toy Library's whistle-blowing procedure, for which there is a separate policy.
- Assist in any investigations by making available all relevant information and by co-operating in interviews.

#### The Trustees:

- Should be contacted if fraud is suspected or discovered;
- Are responsible for investigating actual or suspected fraud;
- Will complete a review of control systems once their investigation has been completed; and
- Should be available to offer advice and assistance on risk and control issues.

Once the Trustees have been informed of a fraud or suspected fraud, they will decide:

- What actions are to be taken in the first 48 hours;
- What actions need to be taken to secure the evidence;
- How to prevent further losses;
- Who within the Pimlico Toy Library will notify the Police and investigate the fraud; and
- Who has responsibility for notifying stakeholders and dealing with external enquiries.

Employees and volunteers are encouraged to report any concerns they may have without fear of being penalised. All concerns reported will be treated in full confidence and fully investigated. If anonymity is requested, every effort will be made to ensure such confidentiality. Please refer to Pimlico Toy Library's Whistle blowing Policy for more information. PTL also has a policy to ensure the investigative process is not misused.

### **Contact details**

To raise a concern under this policy or if you have any questions contact please Maggie Harper, Pimlico Toy Library Co-ordinator on 020 7834 3356 or <a href="mailto:ptlcharity@gmail.com">ptlcharity@gmail.com</a> or the Chair of the Trustees, Max Stanford — <a href="mailto:mtrustees">mtr.stanford@googlemail.com</a>.

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