



Fraud and Bribery Policy

Purpose

The Parliamentary Works Sponsor Body (the Sponsor Body) is committed to preventing and detecting fraud and bribery, with established controls, and to taking effective action if fraud or bribery is suspected or discovered to have occurred.

Scope

Everyone working on the Programme including Sponsor Body staff, Board Members, contractors, suppliers, agency/interim workers, must adhere to the principles set out in this Policy. The Fraud Act 2006 and the Bribery Act 2010 set out the definitions, activities and offences of which all staff are expected to be aware, and of the HM Treasury's guide on 'Tackling Internal Fraud'.

Fraud involves the use of deception to gain an unfair advantage, avoid an obligation or cause loss to another party. All references in this Policy include attempted fraud, which is an offence and regarded with the same gravity as accomplished fraud. Fraud can be perpetrated by people inside and outside the organisation and may or may not involve theft.

Bribery means an advantage offered with the intent to induce improper conduct.

Principles

The Sponsor Body has a zero tolerance for fraud and bribery.

We fulfil our duty to ensure integrity in the use of public money by:

- Promoting awareness among staff, Board Members, contractors, suppliers, agency/interim workers of the risks of fraud and bribery and their responsibilities with regard to detection and prevention;
- Ensuring staff and Board members complete their respective Register of Interests forms and abide by the Gifts and Hospitality Policy;
- Establishing and maintaining appropriate controls to prevent and detect fraud and bribery;
- Investigating actual and perceived cases, and taking effective and corrective action where fraud or bribery is suspected or discovered;
- Identifying risks to which systems and procedures may be exposed.

Implementation

Everyone working on the Programme, including Sponsor Body staff, contractors, suppliers and agency/interim workers, must adhere to the principles set out in this Policy. In so doing, they must be aware of the prohibitions in the Fraud and Bribery Acts.

- The Fraud Act 2006 covers fraud by false representation; fraud by failing to disclose information; fraud by abuse of position; and fraud by deception.



- The Bribery Act 2010 creates the offences of offering, promising or giving a bribe; requesting, agreeing to receive or accepting a bribe; bribing a foreign public official; and (for an organisation carrying out business) failing to prevent bribery.

All staff working on the Programme must also adhere to the principles embodied in the Gifts and Hospitality Policy, as well as to the Code of Conduct Policy and Register of Interests. All acts of fraud and bribery by staff are managed under the Disciplinary Policy.

Responsibilities for staff and line managers

Everyone has a duty to immediately report an actual or perceived act of fraud or bribery, without fear of intimidation or retaliation. Anyone who suspects fraud or bribery may have been, or has been, committed should act quickly to ascertain what has occurred or is suspected, documenting the details clearly and factually, including names, dates, times, transactions, and all other available details), as well as reporting it. Reports must be made, in confidence, to the employee's line manager, or directly to the Finance and Corporate Services Director or the Chief Executive Officer. If this is not possible, the employee should refer to the Whistleblowing Policy.

The individual identifying the actual or potential act of fraud or bribery must not discuss the matter with others. The actual or potential act of fraud or bribery must not be ignored. The individual identified as committing the actual or potential act of fraud or bribery must not be approached or accused. Documentary evidence must not be deleted or removed.

Line managers must not investigate or discuss any matters reported to them with other staff or with the persons under suspicion. They must be responsive and with appropriate sensitivity towards the person making the report, record and document any evidence provided, and promptly refer the matter to their Director or to the Finance and Corporate Services Director.

Responsibilities for management

The Finance and Corporate Services Director is responsible for this Policy and for maintaining the Fraud Risk Register. They investigate all matters, or perceived matters, of fraud and bribery, working with the Head of Human Resources, to ensure appropriate sanctions are implemented including, where necessary, reports to the Police.

Training

Everyone working on the Programme is required to complete training and, as part of the induction, to confirm their awareness of what constitutes fraud, bribery and theft.

Review

This policy is reviewed annually, over the life of the Restoration and Renewal Programme, or more frequently if there is a specific legislative, regulatory or service requirement or a change in practice.

The Finance team, working with the Human Resource team, maintains a Fraud and Bribery Register to record all cases of fraud, bribery and theft, and which includes decisions and actions taken in each case, to support the implementation and improvement of this Policy.



HOUSES OF PARLIAMENT

R&R SPONSOR BODY

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On behalf of the Sponsor Body

July 2020