

# Queen's Park Trust

Revision v1.0, dated 11th May 2026



## Anti-Fraud, Bribery and Corruption Policy

### 1. Purpose

This policy outlines how the Queen's Park Trust prevents, detects, and responds to fraud, bribery, and corruption. It applies to all trustees, staff, and volunteers, as well as anyone acting on behalf of or receiving funds from the charity. This policy supports the Queen's Park Trust's obligations under the Fraud Act 2006, the Bribery Act 2010, and the Charity Commission's guidance 'Protecting charities from harm (CC8)'.

### 2. Policy Statement

The Queen's Park Trust has a zero-tolerance approach to all forms of fraud, bribery, and corruption. We are committed to acting honestly, transparently, and with integrity; safeguarding the charity's funds and assets; and taking disciplinary and/or legal action against anyone found to have engaged in fraud, bribery, or corruption.

### 3. Definitions

**Fraud:** Deliberately providing false or misleading information to gain an advantage or cause loss to another.

**Bribery:** Offering, giving, receiving, or requesting something of value to influence a decision or action improperly.

**Corruption:** Misuse of entrusted power for personal gain.

**Facilitation Payments:** Unofficial payments made to speed up or secure routine government actions. These are strictly prohibited.

**Conflict of Interest:** A situation where personal interests could improperly influence decisions made on behalf of the charity.

## 4. Fraud Risk Assessment

The trustees will review potential areas of fraud risk annually, such as financial transactions, fundraising, and procurement, and will take proportionate steps to reduce exposure to fraud and corruption.

## 5. Prevention and Controls

To minimise risk:

- All payments and expenses require dual authorisation.
- Financial records must be accurate, complete, and reviewed regularly.
- Trustees and staff must declare any potential conflicts of interest.
- Gifts or hospitality must be modest, approved by the Chair or Treasurer, and recorded.
- Cash handling is minimised and bank reconciliations are reviewed monthly.

## 6. Responsibilities

Trustees: Ensure proper internal controls, governance, and review fraud risks.

Chair or Treasurer: Receive and log reports of suspected fraud or bribery, lead investigations, and report outcomes to the board.

Staff and Volunteers: Act honestly, follow financial guidelines, and report any suspicious behaviour.

Suppliers, Contractors, and Partners: Must comply with this policy when working with or for the Queen's Park Trust.

## 7. Reporting Concerns

Anyone who suspects fraud, bribery, or corruption must report it immediately to the Chair or Treasurer (or another trustee if either is implicated). Concerns may be raised confidentially and will be treated seriously. No one will be penalised for reporting a concern in good faith, even if unfounded. Concerns may also be raised under the charity's Whistleblowing Policy, which guarantees confidentiality and protection for anyone reporting in good faith.

## 8. Investigation

All reports will be assessed promptly and investigated proportionately. Evidence will be handled confidentially and securely in line with data protection legislation. If criminal activity is suspected, the matter may be referred to the police, Charity Commission, or other appropriate authorities. The board will take disciplinary or legal action and seek recovery of any lost assets. Serious incidents involving fraud or loss of charity funds will be reported promptly to the Charity Commission and, where appropriate, to relevant insurers.

## 9. Awareness and Training

All new trustees, staff, and volunteers will be briefed on this policy during induction. Trustees and volunteers will receive basic awareness training on identifying and reporting potential fraud or conflicts of interest at least once every two years.

## 10. Record-Keeping

Records will be maintained of all reported incidents, investigations, and outcomes. This information will help monitor risks and strengthen controls.

## 11. Review

This policy will be reviewed annually by the trustees or sooner if required by law or incident review.

## Approval and review

Approved by:	Ray Lancashire
Policy owner:	Queen's Park Trust
Policy author:	Lydia Abou-Jaib
Date:	06/05/2026
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