PRN-181: Fraud, Misrepresentation and Theft Awareness Policy

CAREHOPES™

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1. Policy Statement

CAREHOPES™ is committed to maintaining the highest standards of honesty, integrity, transparency, accountability, and ethical conduct.

CAREHOPES™ adopts a zero-tolerance approach to:

- Fraud
- Theft
- Dishonesty
- Misrepresentation
- Deception
- Financial misconduct
- Abuse of organisational resources
- False claims
- False representation of authority

All employees, volunteers, contractors, supervisors, managers, directors, and third-party providers have a responsibility to protect the organisation, service users, employees, assets, reputation, and resources from fraud, theft, and misrepresentation.

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2. Purpose

This policy aims to:

- Prevent fraud and theft.

- Promote ethical behaviour.
- Protect organisational resources.
- Protect service users.
- Protect employee trust.
- Promote accountability.
- Prevent abuse of authority.
- Prevent unauthorised representation of CAREHOPES™.
- Promote transparency and honesty.

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3. Scope

This policy applies to:

- Employees
- Managers
- Supervisors
- Volunteers
- Contractors
- Agency workers
- Consultants
- Directors
- Third-party providers

The policy applies to:

- Service delivery activities
- Financial transactions
- Procurement activities
- Digital communications
- Social media activity
- Training environments
- Community activities

- External engagements
- Partnership working
- Business development activities

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4. Definitions

Fraud

Fraud is any deliberate act intended to deceive another person or organisation for financial gain, personal benefit, professional advantage, or to cause loss to another party.

Examples include:

- False expense claims
- False timesheets
- False qualifications
- False invoices
- False records
- Unauthorised financial transactions
- Financial misrepresentation

Theft

The dishonest appropriation of:

- Money
- Property
- Equipment
- Information
- Resources

belonging to an individual or organisation.

Misrepresentation

Misrepresentation occurs when an individual knowingly or recklessly presents false, misleading, inaccurate, exaggerated, or unauthorised information regarding:

- Their authority
- Their role
- Their qualifications
- Their responsibilities
- CAREHOPES™ operations
- CAREHOPES™ policies
- CAREHOPES™ decisions
- CAREHOPES™ intentions

for personal, professional, financial, social, or reputational benefit.

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5. Organisational Representation

CAREHOPES™ employees represent the organisation only within the scope of their assigned role and duties.

For the avoidance of doubt:

Employees are NOT organisational representatives simply because they work for CAREHOPES™.

Employees may represent:

- Their own role
- Their assigned duties
- Information specifically authorised for their role

Employees must not present themselves as:

- Official organisational spokespersons
- Official company representatives
- Official company decision-makers
- Official company negotiators
- Official company delegates

unless formally authorised.

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6. Official Representation of CAREHOPES™

Only individuals formally authorised by:

- The Board of Directors
- The Chairman
- The Chief Executive Officer (CEO)

may temporarily represent CAREHOPES™ in an official capacity.

Such authorisation should:

- Be role-specific
- Be event-specific where applicable
- Be purpose-specific
- Be time-limited

Authorisation may be withdrawn at any time.

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7. Prohibited Misrepresentation

Employees must never:

- Claim they speak on behalf of CAREHOPES™ without authorisation.
- Negotiate on behalf of CAREHOPES™ without authority.
- Enter agreements on behalf of CAREHOPES™ without authority.
- Make commitments on behalf of CAREHOPES™ without approval.
- Issue organisational statements without authorisation.
- Present personal opinions as organisational positions.
- Use CAREHOPES™ branding to advance personal interests.
- Misrepresent their role or authority.

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8. Employee Responsibilities

Employees must:

- Act honestly.

- Declare concerns.
- Protect organisational assets.
- Safeguard information.
- Report suspected fraud.
- Report suspected theft.
- Report suspected misrepresentation.
- Comply with governance procedures.

Employees must cooperate fully with investigations.

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9. Examples of Fraud and Theft

Examples may include:

- Falsifying timesheets
- Claiming unworked hours
- Submitting false invoices
- Misusing company funds
- Theft of equipment
- Theft of data
- Theft of intellectual property
- Misuse of company vehicles
- Misuse of organisational subscriptions
- Fraudulent qualification claims

This list is not exhaustive.

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10. Digital Fraud and Cyber Misrepresentation

Employees must not:

- Create fake online identities representing CAREHOPES™.
- Operate unofficial CAREHOPES™ accounts.
- Use organisational branding without permission.

- Impersonate company leadership.
- Misrepresent authority online.
- Create or distribute false organisational communications.

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11. Supervisor Responsibilities

Supervisors must:

- Promote honest conduct.
- Monitor compliance.
- Identify risks.
- Escalate concerns.
- Review suspicious activity.
- Support investigations.

Supervisors must never ignore suspected fraudulent activity.

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12. Third-Party Provider Responsibilities

Third-party providers must:

- Act honestly.
- Avoid misrepresentation.
- Follow contractual requirements.
- Declare conflicts.
- Cooperate with investigations.

Any fraudulent activity may result in immediate contract review or termination.

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13. Reporting Concerns

Employees should report concerns relating to:

- Fraud
- Theft
- Financial irregularities

- Misrepresentation
- False authority claims
- Unauthorised representation

through:

- Supervisors
- Senior managers
- Governance leads
- Whistleblowing arrangements

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14. Investigation Process

CAREHOPES™ may:

- Conduct fact-finding reviews.
- Review documentation.
- Review communications.
- Interview witnesses.
- Conduct audits.
- Refer matters externally where appropriate.

Investigations will be conducted fairly and objectively.

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15. Monitoring and Compliance

CAREHOPES™ will monitor compliance through:

- Audits
- Financial reviews
- Governance reviews
- Supervision
- Investigations
- Whistleblowing reports
- Quality assurance activities

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16. Breach of Policy

Breaches may result in:

- Additional training
- Formal warnings
- Suspension
- Dismissal
- Contract termination
- Recovery of losses
- Referral to professional regulators
- Referral to law enforcement agencies
- Civil recovery proceedings

Fraud, theft, and deliberate misrepresentation are likely to constitute **gross misconduct**.

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17. Related Policies

- Anti-Fraud Policy
- Anti-Bribery Policy
- Abuse of Power, Position, Authority and Privilege Policy
- Conflict of Interest Policy
- Whistleblowing Policy
- Information Governance and Data Security Policy
- Cyber Security and Internet Fraud Awareness Policy
- Duty of Care Policy
- Code of Conduct Policy

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18. Policy Review

This policy will be reviewed:

- Annually
- Following fraud investigations
- Following governance reviews
- Following legislative changes
- Following regulatory updates