

Policy Name:	Fraud Policy
Policy Ref:	POL/FR/FR/0001
Who it applies to:	Employees, CILEX Board, Committee members and trustees (including any of its intermediaries, subsidiaries or associated companies.
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Policy Type:	Corporate
Policy Owner:	Corporate Compliance Manager
Approved by:	Corporate Policy Review Panel (CPRP)
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Equality Impact Assessment Screened	Yes
Contractual terms and conditions which will be changed following legal requirements	Yes

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Introduction

This policy forms part of the Chartered Institute of Legal Executives' (CILEX) internal control and corporate governance arrangements. CILEX means here the Chartered Institute of Legal Executives and its subsidiaries.

The CILEX board is committed to ensuring that effective policies, operate throughout the organisation.

This policy is contractual and is intended as a statement of current CILEX policy and its commitment to operate a fair procedure, taking into account statutory and other guidelines. CILEX therefore reserves the right to amend this policy and procedure as necessary to meet any changing requirements.

One of CILEX's core values is to conduct its business fairly, openly and honestly with a zero-tolerance approach to fraud. CILEX is committed to promoting and maintaining the highest level of ethical standards in relation to all of its business activities. Its reputation for maintaining lawful business practices is of paramount importance and this policy is designed to preserve these values.

Purpose and scope of policy

This policy is based on the Fraud legislation (Fraud Act 2006) which requires that all permanent & temporary employees, CILEX board, committee members and trustees (including any of its intermediaries, subsidiaries or associated companies must not either directly or indirectly:

- False representation: a person commits fraud by intentionally and dishonestly making a false representation. A false representation includes intentionally giving a misleading or untrue statement.
- Failing to disclose information: a person commits a fraud if they dishonestly fail to disclose information.
- Abuse of position: a person commits a fraud if they dishonestly abuse their position

CILEX takes the most serious view of any attempt to commit fraud by employees, Volunteers, Directors, Board members, Trustees, members and/or other associated person including, but not limited to, contractors and their employees and agents acting on behalf of CILEX.

Employees involved in impropriety of any kind will be subject to disciplinary action, including prosecution, if appropriate.

CILEX treats attempted fraud as seriously as accomplished fraud.

This policy should be read in conjunction with the Anti-Bribery and Corruption Policy.

Responsibilities

All permanent, temporary employees, CILEX Board, committee members and trustees (including any of its intermediaries, subsidiaries or associated companies) are expected to understand and adhere to the principles set out in this policy, as well as prevent, detect and report any forms of fraud.

It also applies to any individual or corporate entity associated with, or who performs functions in relation to, or for and on behalf of, CILEX including, but not limited to, directors, agency workers, casual workers, contractors, consultants, seconded employees, agents, suppliers and sponsors ("associated persons").

All permanent, temporary employees, CILEX Board, committee members and trustees (including any of its intermediaries, subsidiaries or associated companies) are required to:

- comply with any fraud legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business.
- act honestly, responsibly and with integrity.
- safeguard and uphold the organisation's core values by operating in an ethical, professional and lawful manner at all times.

CILEX management are responsible for:

- 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 any party whose failures have contributed to the commission of the fraud.

It is the responsibility of the Corporate Compliance Manager to ensure that this policy is reviewed and revised as necessary to take into account stakeholder feedback, recommendations from regulatory authorities, changes in legislation, or other relevant factors.

Legal Obligations

[Bribery Act 2010](#)

[Whistleblowing Commission Code of Practice.](#)

Fraud Act 2006

References

The following CILEX Group Corporate policies fall within the reach of this policy:

- [Anti-Bribery and Corruption Policy](#)
- [Whistleblowing Policy](#)
- [Gifts and Hospitality Policy](#)

- [Conflicts of Interest Policy](#)
- [Data Protection Policy](#)
- [Archive, Retention and Destruction Policy](#)
- [Risk Management Policy](#)
- Disciplinary Policy