



For External Use

Fraud Prevention and Anti-Bribery

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Version 5.0

All NOC Policies and Procedures apply to NOC Innovations unless otherwise stated.

Document Control

Version	Date	Author	Comment	Approval
1.0	Oct 2019	Head of L&G	Final	Board
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3.0	Sept 2023	Head of L&G	Annual review	Board
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5.0	Sept 2025	Governance Team	Strategy Update	L&G

Policy Owner: Director of Operations

Updates: The effectiveness of policies and procedures is monitored on an ongoing basis. This ensures that regulatory/legal change, incident occurrence and/or stakeholder engagement is considered and incorporated as the policy owner may deem necessary. Additionally, NOC's policy framework and procedure are subject to an effectiveness review every 3 years, records of which will be kept by the Legal & Governance Team. For further information please contact governance@noc.ac.uk

Deletion Date: When a policy is superseded or no longer required.

Contents

1. Scope	3
2. Purpose	3
3. Policy	3
4. Monitoring and Evaluation	5
5. Associated Documents	5

1. Scope

This policy applies to all persons working for or on behalf of NOC in any capacity. This includes trustees, staff, agency or seconded workers, volunteers, interns, consultants, contractors, students, third party representatives and business partners.

This policy applies to all NOC work taking place anywhere in the world. Where NOC work takes place in a country with non-equivalent law, the UK law and this policy should be followed.

2. Purpose

NOC is committed to preventing fraud, bribery and corruption in all its activities, meeting the requirements of all Fraud Prevention and Anti-Bribery law, including the Fraud Act 2006 and the Bribery Act 2010, and ensuring that the organisation has reasonable fraud prevention measures in place. This document outlines how NOC intends to achieve this. Annexes are available for internal use which provide procedural and relevant contact information.

3. Policy

NOC's policy on fraud prevention and anti-bribery shall align with the relevant laws that direct UK company and charity requirements.

Fraud and Bribery attempts can occur via many methods and quite often from anonymous online sources. NOC staff must follow all IT Security requirements and are encouraged to question out of the ordinary requests. Especially where these requests relate to a financial transaction and where urgency forms part of that request.

The safety and wellbeing of NOC staff is paramount and there is no expectation for anyone to put themselves or others in danger where a fraud or bribery attempt is made. In all instances, reporting attempts or an instance as soon as possible is important to meet the requirements of this policy.

NOC's policy statement is as follows;

- NOC has a zero-tolerance approach to any form of corruption.
- NOC will implement controls that guide and direct staff to remain compliant with fraud prevention and anti-bribery laws.
- NOC will deliver engagement and training activities related to Fraud and Bribery awareness to all staff on an annual basis.
- NOC will conduct routine Internal Audits which test the controls in place to prevent fraud and bribery from taking place.
- NOC will routinely risk assess the likelihood of fraud and bribery taking place within or against NOC.

- NOC will have in place suitable IT controls that intend to prevent fraudulent attempts by external sources.
- NOC provides a means of reporting instances or suspicions of fraud either directly or via the whistleblowing procedure.
- NOC provides clear guidance and routine training related to what NOC deems appropriate to accept or give as a Gift or Hospitality.
- NOC provides a clear and simple way to declare instances of Gifts & Hospitality and maintains a corporate register of all Gifts and Hospitality in order that NOC meets its transparency requirements.
- NOC will take robust and prompt action against the individual(s) involved in any instances of wrongdoing, including disciplinary action up to and including termination of employment and reporting to the relevant law enforcement authority.

Definitions

Fraud – A criminal activity where deception is used for personal gain or to cause a loss. There are three main types of fraud: Fraud by false representation, fraud by failing to disclose information or fraud by abuse of position. There is also a corporate offence of failing to prevent fraud being undertaken on its behalf.

Bribery – The law defines 4 criminal offences: offering or paying a bribe, requesting or receiving a bribe, bribing a foreign public official, and a corporate offence of failing to prevent bribery being undertaken on its behalf.

Gift – Material in nature and has a financial value. This does not include promotional or branded items available to anyone. NOC guidelines are available in an Annex for internal use only.

Hospitality – Providing entertainment, food, or drinks to guests, visitors, partners or suppliers. This won't include basic refreshments or meals provided as part of an event. NOC guidelines are available in an Annex for internal use only.

Expectations and Compliance

NOC staff are expected to meet all requirements of this policy in line with the Compliance Guidance for Staff.

- The Board of Trustees are accountable for ensuring NOC complies with all legal and ethical obligations.
- The Chief Executive Officer has overall responsibility for managing fraud and bribery risk at NOC.
- The Director of Operations has delegated responsibility to manage the operational risk of fraud and bribery.
- The Head of Legal and Governance is responsible for ensuring this policy remains up to date and relevant, and that any instances of reported fraud and bribery are investigated.
- Line Managers are responsible for ensuring those reporting to them understand and comply with this policy.

- All staff must report to the Legal and Governance Team or use the Whistleblowing procedure immediately if they observe or discover any instance of fraud or bribery or identify a control gap that could enable such activities.

4. Monitoring and Evaluation

This policy will be monitored in line with the governance framework. This includes conducting routine reviews and responding to feedback, incidents or legislation change.

5. Associated Documents

- Expenses Policy
- Investigation Procedure
- Annex A: Fraud Prevention & Anti-Bribery Response Plan – Internal use only
- Annex B: Gifts & Hospitality Guidance – Internal use only