FEAST With Us

Anti-Fraud, Bribery and Corruption Policy

Last updated: 5 July 2026

Policy Scope

FEAST With Us (hereafter referred to as FEAST) is committed to conducting all its activities with honesty, integrity, and transparency. FEAST adopts a zero-tolerance approach to fraud, bribery, and corruption, and is committed to conducting its activities with honesty, integrity and transparency in accordance with the law.

This policy applies to all individuals working for or representing FEAST, including trustees, employees, volunteers, contractors, suppliers, and any third parties acting on behalf of the charity.

FEAST will not tolerate any level of fraud, bribery, or corruption within its operations or by any individual or organisation associated with it. The charity will take disciplinary and/or legal action against anyone found to have engaged in, facilitated, or concealed fraudulent or corrupt behaviour.

FEAST’s objectives are to:

- Protect the charity’s resources and reputation.
- Promote an organisational culture of integrity and accountability.
- Ensure compliance with the **Bribery Act 2010**, **Fraud Act 2006**, and **Criminal Finances Act 2017**.
- Maintain public trust and confidence in FEAST’s charitable activities.

Definitions

- **Fraud:** Knowingly making a false or misleading representation to gain an advantage or cause loss to another. Examples include falsifying expense claims, misreporting income, submitting false invoices, theft or diversion of donated food, misuse of charitable donations or grant funding, or improper personal use of charity assets, including vehicles and equipment.

- **Tax Evasion (Fraud)** – any deliberate omission, concealment or misinterpretation of information, or the false and deceptive presentation of information or circumstances in order to gain a tax advantage. An example of tax evasion could be: deliberately failing to declare taxable income to HMRC, submitting false records to reduce a tax liability, or requesting that a payment not be recorded in a supplier's accounts to avoid tax. **Failing to prevent an organisation's staff or representatives from facilitating tax fraud is a criminal offence.**
- **Bribery:** Offering, promising, giving, requesting, or accepting money, gifts, or inducements to influence actions improperly.
- **Corruption:** Misuse of entrusted power for personal gain, including diversion of funds or dishonest behaviour by those in positions of authority.
- **Gifts and Hospitality:** Staff, volunteers and trustees must not accept gifts or hospitality that could reasonably be perceived as influencing a decision. Any gift with an estimated value above £25 must be declared to the CEO.

Responsibilities

- **Trustees:** Provide leadership and oversight, ensuring this policy is implemented and reviewed regularly.
- **CEO:** Promote awareness, ensure compliance, and lead by example.
- **Managers:** Monitor adherence within their teams and projects, assess risks, and report concerns promptly.
- **All Staff and Volunteers:** Act honestly, avoid conflicts of interest, and report any suspected wrongdoing immediately.

Risk Management

FEAST will assess fraud and bribery risks annually and implement proportionate controls. FEAST will undertake risk-based due diligence on suppliers, partners, donors and other third parties where appropriate. FEAST does not make political donations and ensures that charitable donations are never used as inducements for improper conduct. Volunteers must not use their position to obtain personal benefits, preferential treatment or private gain from donors, suppliers or beneficiaries.

Training and Communication

FEAST will ensure that all staff and volunteers receive training on this policy during induction and through periodic updates. FEAST will also clearly identify the Anti-Fraud, Bribery and Corruption Policy on our website.

Reporting and Investigation

By Staff and Volunteers

All staff and volunteers must report any suspected or actual instances of fraud, bribery, or corruption. Reports can be made to a line manager or directly to the operations manager or CEO.

Allegations involving a manager, the CEO or a trustee should be reported to the Chair of the Board of Trustees. Allegations involving the Chair should be reported to another trustee.

Failure to report could result in disciplinary action. FEAST will not penalise anyone raising a concern in good faith, even if it turns out to be unfounded. Any staff member who victimises or harasses someone for raising a concern in good faith will themselves be subject to disciplinary action.

FEAST will protect whistleblowers acting in good faith and will investigate all reports promptly and confidentially. Confirmed cases may be referred to external authorities such as the Charity Commission, Action Fraud, or HMRC, depending on the nature of the offence.

To enable proper investigation, staff and volunteers should record details of any fraud, bribery or corruption (actual or attempted) as soon as possible after the event. Any reported instances of suspected or actual fraud, bribery and corruption should be investigated as soon as possible in in accordance with FEAST's Whistleblowing Policy. The objective of the investigation will be to:

a) Confirm whether fraud, bribery or corruption has taken place and to identify who was responsible
b) Confirm whether internal controls and procedures have worked in practice
c) Identify any improvements required to agreed policies and procedures

Depending on the outcome of the investigation, subsequent action will be determined. This may involve disciplinary action against staff and volunteers.

By Third Parties

Partners, suppliers, donors, beneficiaries and other third parties are encouraged to report any suspected or actual instances of fraud, bribery or corruption relating to FEAST. Reports may be made to a manager, the CEO (or the Chair of the Board of Trustees if the allegation involves a manager or the CEO) and will be investigated appropriately.

Conflicts of Interest

Staff, volunteers and trustees must declare any actual, potential or perceived conflicts of interest in accordance with FEAST's Conflicts of Interest Policy.

Monitoring and Review

This policy will be reviewed annually or following any significant operational change or incident. Updates will be approved by the Board of Trustees and communicated to all staff and volunteers.

Contacting Us

If you have any questions about this policy, please contact us at info@feastwithus.org.uk.

Reviewed and approved on 5 July 2026 by Caroline Monkhouse Flower, CEO, and Helen Burgess, Chair of the Board of Trustees, on behalf of the board.

Signed by:

Helen Burgess
Chair of the Board of Trustees

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