

World Land Trust Policy on Financial Misconduct and Corruption

Introduction

This document sets out the policy of the World Land Trust (WLT) covering all forms of financial misconduct, corruption, bribery and other forms of dishonesty.

It applies to Trustees, Council Members, staff and volunteers. Anybody associated with WLT who commits bribery, fraud, theft, or any other form of dishonesty or corruption, or who becomes aware of it and does not report it, will be subject to appropriate action, which may include reporting the incident to the Charity Commission and law enforcement agencies.

Definitions and legislation

This policy has been devised following guidance from the Charity Commission. The main acts relating to financial crime and corruption are:

- *Fraud Act 2006*
- *Theft Act 1968*
- *Proceeds of Crime Act 2002*
- *Terrorism Act 2000, Anti-Terrorist Crime and Security Act 2001, Counter-Terrorism Act 2008*
- *Bribery Act 2010*

Fraud: a form of dishonesty undertaken in order to make a gain or cause loss to another, involving either false representation, failing to disclose information or abuse of position

Theft: dishonestly appropriating property belonging to another with the intention of permanently depriving the other of it.

Money laundering: the process of turning the proceeds of crime into property or money that can be accessed legitimately without arousing suspicion.

Financing of Terrorism: Terrorist financing is the raising, moving, storing and using of financial resources for the purposes of terrorism.

Bribery: offering, promising or giving someone a financial or other advantage to encourage them to perform their functions or activities improperly.

The Policy

WLT is committed to fostering a culture of honesty and integrity, underpinned by seven principles: selflessness, integrity, objectivity, accountability, openness, honesty and leadership. Trustees, Council Members, staff and volunteers are expected to lead by example in adhering to policies, procedures and practices. Equally, supporters, partners and external organisations (such as suppliers and contractors) are expected to act with integrity and without intent to commit fraud against the Trust in any dealings they may have with the Trust.

WLT will ensure that all its financial and administrative processes are carried out and reported honestly, accurately, transparently and accountably and that all decisions are taken objectively and free of personal interest. WLT will not tolerate any behaviour that falls short of these principles.

WLT will provide clear routes by which concerns can be raised by Trustees, Council Members, staff and volunteers and by those outside of the Trust.

Responsibilities

All members of the organisation, in whatever capacity, have a responsibility to:

- conduct themselves in accordance with the seven principles of selflessness, integrity, objectivity, accountability, openness, honesty and leadership;

- act with propriety in all activities relating to WLT, particularly in the use of the Trust's resources and the handling and use of funds;
- observe all WLT procedures implemented to protect against financial misconduct and corruption, and to report promptly any suspicions or allegations of wrong-doing;
- co-operate fully with any reviews, checks or investigations into incidents, whether conducted internally or by external regulators or law enforcement agencies.

Specific responsibilities are as follows:

Trustees

The Trustees have legal responsibility for ensuring that WLT's funds are properly used and for protecting its charitable assets from misuse or abuse for fraudulent or other criminal purposes, by:

- making sure that proper robust financial controls and appropriate procedures are in place;
- taking appropriate action when, and in the interests of the Trust, dealing with incidents of fraud and other financial misconduct.

The Chief Executive Officer (CEO):

Trustees have delegated to the CEO overall responsibility for the implementation of measures to implement the policy.