



Liverpool Archdiocesan  
Lourdes Pilgrimage  
Association

# **Anti-Fraud, Bribery and Financial Misconduct Policy**

*(Aligned with UK Charity Commission  
Guidance CC8)*

Name of originator/author:	Policy Review Group & Pilgrimage Executive
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## Purpose

This policy sets out LAPA's approach to preventing, detecting, and responding to fraud, bribery, and financial misconduct.

It reflects the Charity Commission's expectation that trustees:

- Safeguard charity assets
- Ensure proper use of funds
- Act with reasonable care and skill
- Put appropriate financial controls in place (CC8)

LAPA is committed to stewardship rooted in integrity, ensuring all funds entrusted for pilgrimage and charitable purposes are properly protected and used.

## Scope

This policy applies to:

- Trustees
- Employees
- Volunteers and helpers
- Pilgrimage leaders
- Anyone handling LAPA funds or assets
- Third parties acting on behalf of LAPA

## Legal and Regulatory Framework

This policy aligns with:

- **Charity Commission CC8 (Internal Financial Controls)**
- **Charity Commission CC3 (The Essential Trustee)**
- **Fraud Act 2006**
- **Bribery Act 2010**

Trustees have ultimate responsibility for ensuring compliance.

## Definition of Fraud and Financial Misconduct

Fraud includes any intentional act to gain advantage or cause loss through deception.

Examples:

- Theft or misappropriation of donations or pilgrimage funds
- False accounting, including altering records
- Submitting false expenses
- Unauthorized fundraising or use of funds
- Bribery, kickbacks, or conflicts of interest
- Misuse of charity assets (cash, equipment, data)

## Policy Statement

LAPA adopts a **zero-tolerance approach** to fraud and financial misconduct.

In line with Charity Commission expectations:

- All suspicions will be taken seriously
- Significant incidents will be reported to the Charity Commission where required
- Appropriate action will be taken, including disciplinary and legal action

## Trustee Responsibilities (CC3 & CC8 Alignment)

Trustees must:

- Ensure strong internal financial controls are in place
- Regularly review financial risks
- Safeguard charity funds and assets
- Ensure proper record keeping and transparency
- Act promptly on suspicions of fraud
- Report serious incidents to the Charity Commission

## Financial Controls (Core CC8 Requirements)

LAPA will implement the following controls:

### **Segregation of Duties**

Where practical:

- Different individuals handle authorisation, payment, and reconciliation
- No individual has sole control over financial processes

### **Income Controls**

- All donations and pilgrimage payments are recorded promptly
- Receipts issued for cash where appropriate
- Cash counts verified by two individuals

### **Banking Controls**

- All funds banked promptly and intact
- Bank reconciliations completed regularly and independently reviewed

### **Payment Controls**

- Payments authorised by designated individuals
- Dual authorisation for larger payments
- Clear expense approval processes

### **Record Keeping**

- Accurate and timely financial records maintained
- Supporting documentation retained
- Accounts prepared in line with charity requirements

### **Pilgrimage-Specific Controls**

- Clear procedures for handling cash during trips
- Designated, accountable individuals responsible for funds
- End-of-pilgrimage reconciliation and reporting

## Risk Management

LAPA will:

- Periodically assess fraud risks
- Review internal controls regularly
- Adjust procedures where risks are identified

## Reporting Suspected Fraud

All individuals have a duty to report concerns.

Reports should be made to:

- A Trustee (preferably Chair or Treasurer)
- Designated safeguarding/compliance contact

Reports should include:

- Nature of concern
- Individuals involved
- Supporting evidence (if available)

## Serious Incident Reporting (Charity Commission)

Trustees will report serious incidents to the Charity Commission where appropriate, including where:

- There is significant financial loss
- Fraud involves senior individuals
- The charity's reputation is at risk

## Confidentiality and Whistleblowing

In line with best practice:

- Concerns will be handled confidentially
- Whistleblowers acting in good faith will be protected
- Retaliation is strictly prohibited

## Investigation Procedures

LAPA will:

- Act promptly on all reports
- Conduct fair, proportionate investigations
- Maintain proper records of findings
- Escalate matters to external authorities when necessary

## Disciplinary and Legal Action

Where fraud is proven, LAPA may:

- Remove individuals from roles
- Recover funds or assets
- Report to police or regulatory bodies
- Take civil or criminal legal action

## Training and Awareness

LAPA will:

- Provide guidance to those handling funds
- Ensure trustees understand their responsibilities
- Promote a culture of transparency and accountability

## Monitoring and Review

This policy and associated controls will be:

- Reviewed annually by Trustees
- Updated in response to regulatory changes or risks
- Tested periodically for effectiveness

## Commitment to Stewardship

LAPA recognises its duty to protect funds donated in good faith. In accordance with Charity Commission guidance, this policy ensures those resources are:

- Properly safeguarded
- Used only for charitable purposes
- Managed with integrity and accountability