



ELEVATED UP CIC

Anti-Fraud, Bribery & Corruption Policy

Policy	Anti-Fraud, Bribery & Corruption Policy
Organisation	Elevated Up CIC, Unit 2 Winster Grove, Birmingham, West Midlands, B44 9EG (Company No. 16143711)
Version	1.0
Approved by	Board of Directors
Date approved	June 2026
Date of next review	June 2027
Policy owner	Board of Directors

1. Our commitment

Elevated Up CIC has a zero-tolerance approach to fraud, bribery and corruption. We are entrusted with public and grant funding, and we are committed to protecting that money, acting honestly, and meeting our duties under the Bribery Act 2010 and the law on fraud.

2. Scope

This policy applies to every director, member of staff, volunteer and contractor acting on our behalf.

3. What we mean

- Fraud – dishonestly making a gain, or causing a loss, for example false claims, fake invoices or misusing funds.
- Bribery – offering, giving, requesting or accepting anything of value to influence a decision improperly.
- Corruption – the misuse of position or trust for personal gain.

4. What we will not do

- We never offer or accept bribes, kickbacks or improper payments.
- We do not make facilitation payments.
- We control gifts and hospitality so they cannot influence, or appear to influence, our decisions (see our Conflict of Interest Policy).

5. How we prevent it

We reduce risk through the controls in our Financial Management & Controls Policy, including approved budgets, a second approver for larger payments, separating financial duties where our size allows, and checking bank records against our own. Directors lead by example and keep these controls under review.



6. Reporting a concern

Anyone who suspects fraud, bribery or corruption must report it to a Director, or to the Chair of the Board if the concern involves a Director. Concerns can be raised in confidence and are protected under our Whistleblowing Policy. We take every report seriously and investigate promptly.

7. Acting on it

Where wrongdoing is found, we will take action up to and including ending a person's involvement, and we will report matters to the Police, Action Fraud and our funders where appropriate. We will always tell a funder if their money has been misused.

8. Review

This policy is reviewed every year.

Approval

Approved on behalf of the Board of Directors:

A handwritten signature in black ink, appearing to read 'Emma Hobbis', is written over a horizontal line.

Emma Hobbis

Director, Elevated Up CIC

Date approved: June 2026