

FRAUD PREVENTION POLICY

Policy last updated: August 2024

Review date: August 2025

Policy wording

Introduction

North Lancs Training Group is committed to the highest standards of openness, probity and accountability. It will not tolerate fraud and is committed to reducing its risk of fraud to the lowest possible level. This Fraud Policy (the "Policy") is a statement of NLTG's resolve to prevent, detect and act upon cases of fraud in a robust manner. The purpose of the Policy is to further enhance systems, policies and procedures which deter acts of fraud and to encourage development of an anti-fraud culture.

Definition:

For the purpose of this Policy, fraud may be defined as an intentional act involving the use of deception in order to obtain an undue benefit or avoid an obligation that results in a loss to another party. Fraud is taken to include, but not limited to, theft (physical and cyber), misuse of property, corruption, the alteration of financial or other records, deception, bribery, extortion, conspiracy, embezzlement, false representation, concealment of material facts and collusion.

This policy is predominantly concerned with occupational fraud i.e. fraud committed by NLTG employees or contractors in the course of their work. Guidance on issues arising from the private and personal activities of staff which may impinge on the performance of their duties or risk bringing discredit to the NLTG is contained in NLTG's code of Conduct.

Occupational fraud and abuses fall into four main categories:

- theft, the misappropriation or misuse of assets for personal benefit;
- bribery and corruption;
- false accounting and/or making fraudulent statements with a view to personal gain or gain for another: for example, falsely claiming overtime, travel and subsistence, sick leave or special leave (with or without pay);
- externally perpetrated fraud against the company.

In the context of Bribery, specific reference should be made to the companies Anti-Bribery Policy.

Scope

This policy applies to any irregularity, or suspected irregularity, involving employees as well as consultants, vendors, contractors, and/or any other parties with a business relationship with North Lancs Training Group. Any investigative activity required will be conducted without regard to any person's relationship to NLTG, position or length of service.

Policies & Principles

NLTG is committed to preventing fraud and corruption from occurring and to retaining an anti-fraud culture. To achieve this NLTG will:

- develop and maintain effective controls to prevent fraud;
- ensure that if fraud occurs a vigorous and prompt investigation takes place;
- take appropriate disciplinary and legal action in all cases, where justified;
- review systems and procedures to prevent similar frauds;
- investigate whether there has been a failure in supervision and take appropriate disciplinary action where supervisory failures occurred; and
- record and report all discovered cases of fraud.

The following policies and principles apply in NLTG.

- NLTG staff must have, and be seen to have, the highest standards of honesty, propriety and integrity in the exercise of their duties.
- NLTG will not tolerate fraud, impropriety or dishonesty and will investigate all instances of suspected fraud, impropriety, or dishonest conduct by NLTG staff or external organisations (contractor or client).
- NLTG staff must not defraud NLTG, other NLTG staff, NLTG clients or NLTG contractors, in any way.
- NLTG will take action – including dismissal and/or criminal prosecution - against any member of staff defrauding (or attempting to defraud) NLTG, NLTG staff, NLTG clients or contractors.

- NLTG will take action - including criminal prosecution - against external organisations defrauding (or attempting to defraud) NLTG, NLTG staff in the course of their work, NLTG clients or contractors.
- NLTG will co-operate fully with an external investigating body.
- NLTG will always seek to recover funds lost through fraud.
- All allegations of fraud will be reported to the Senior Management Team

Action to be Taken in the Event of Discovery or Suspicion of Fraud

NLTG has established arrangements for staff to report any concerns they may have without fear of prejudice or harassment. This applies to concerns relating to fraud and to any other concerns within the context of the Public Interest Disclosure Act 1998.

Concerns which should be reported include, but are not limited to, staff committing or attempting to commit:

- any dishonest or fraudulent act.
- forgery or alteration of documents or accounts;
- misappropriation of funds, supplies or other assets;
- impropriety in the handling or reporting of money or financial transactions;
- profiting from an official position;
- disclosure of official activities or information for advantage;
- accepting or seeking value from third parties by virtue of official position or duties
- theft or misuse of property, facilities or services.

External organisations' actions which should be reported include:

- being offered a bribe or inducement by a supplier.
- receiving fraudulent (rather than erroneous) invoices from a supplier;
- reported allegations of corruption or deception by a supplier.

The Board's Policy

The Board is absolutely committed to maintaining an honest, open and well-intentioned atmosphere within the company. It is therefore also committed to the elimination of any fraud within the company and to the rigorous investigation of any such cases.

The Board wishes to encourage anyone having reasonable suspicions of fraud to report them. Therefore, it is also the Board's policy, which will be rigorously enforced, that no employee will suffer in any way as a result of reporting reasonably held suspicions in line with NLTG's Whistleblowing Policy

All members of staff can therefore be confident that they will not suffer in any way as a result of reporting reasonably held suspicions of fraud. For these purposes reasonably held "suspicions" shall mean any suspicions other than those, which are raised maliciously and found to be groundless. NLTG will deal with all occurrences in accordance with the Public Interest Disclosure Act.

To be used in conjunction with NLTG's Whistleblowing (NL0500 e (xii)) and Anti - Bribery Policy (NL0500 e (xvi))

Policy Review and Training

Specific NLTG staff as identified by a member of the Senior Management Team are required to complete specific training on a periodic basis.

This policy will be reviewed on no less than on an annual basis.

Data Protection

When an individual reports a concern, NLTG will process any personal data collected. In accordance with its data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the concern / report.



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