

Anti-Fraud Policy

General policy statement

Welcome Skills requires all staff at all times to act honestly and with integrity and to safeguard the public resources for which the Organisation is responsible.

Fraud is an ever-present threat to these resources and hence must be a concern to all members of staff and persons employed in a similar capacity. Fraud may occur internally or externally and may be perpetrated by staff, consultants, suppliers, contractors or development partners, individually or in collusion with others.

The purpose of this document is to set out your responsibilities with regard to fraud prevention, what to do if you suspect fraud and the action that will be taken by management.

Definition

In addition to the existing common law offence of conspiracy to defraud, the Fraud Act 2006 provides for a general offence of fraud with three ways of committing it.

These are:

- Fraud by false representation
- Fraud by failing to disclose information
- Fraud by abuse of position

For the purpose of reporting fraud, the following are included in the fraud report: theft, false accounting, bribery and corruption, deception and collusion.

Computer fraud is where information technology equipment has been used to manipulate programs or data dishonestly (for example, by altering, substituting or destroying records, or creating spurious records), or where the use of an IT system was a material factor in the perpetration of fraud. Theft or fraudulent use of computer time and resources, including unauthorised personal browsing on the internet, is included in this definition.

Organisational responsibilities

Irrespective of the amount involved, the Organisation requires that all cases of attempted or suspected fraud shall be reported to The Managing Director immediately.

In order to minimise potential risk to the Organisation, Welcome Skills aim to ensure it has suitable policies and practices in place to safeguard itself against fraud and theft.

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Managers' responsibilities

The day to day responsibility for the prevention and detection of fraud rests with line managers who are responsible for identifying the risks to which systems, operations and procedures are exposed, developing and maintaining effective controls to prevent and detect fraud, and ensuring that controls are being complied with.

All staff, including managers, are responsible for acting with propriety at all times and reporting details immediately to the Managing Director if they suspect or believe that there is evidence of irregular or improper behaviour or that a fraud may have been committed.

Disciplinary action

In the case of proven fraud, or suspected fraud of a serious nature, Welcome Skills reserves the right to refer the matter to the police at the earliest possible juncture.

Notwithstanding this, and following appropriate investigations, the Managing Director will determine whether to invoke action in accordance with established disciplinary procedures.

Personal conduct

As stewards of public funds all staff must have, and be seen to have, high standards of honesty, propriety and personal integrity. Staff are required to report any potential conflict of interest to their Line Manager and the Managing Director. Staff should not accept gifts, hospitality or benefits of any kind from a third party which might be seen to compromise their personal judgement and integrity.

Conclusion

The Organisation views fraud very seriously. All instances will be investigated rigorously and promptly and appropriate action will be taken.

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