Anti-Fraud Statement

**Making a Difference (South) Project**

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| **Maintenance Policy Owner** | Making a Difference (South) Contract Manager |
| **Review** | Annual |
| **Version** | 2 |
| **Next review** | Oct 2022, or when the Corporate policy is updated (whichever is soonest) |

**Overview**

Education Development Trust is committed to high ethical and moral standards in the conduct of all its activities, based on the “Nolan Principles” established by the Committee on Standards in Public Life.

Adherence to these principles are expected and secured contractually from all employees and contractors, and a culture which fosters this is supported by specific policies and procedures, including:

Code of Conduct (Appendix 1)

Whistleblowing Policy (Appendix 2)

EDT has committed to the Chartered Institute of Procurement and Supply’s Code of Ethics. This ensures our commitment to eradicating unethical business practices including bribery, fraud and corruption. Through this commitment we ensure that:

* All employees involved in sourcing and supplier management are aware of and understand the Trust’s ethical code, and how it relates to procurement and supply management; forming part of new staff induction and ongoing performance measurement objectives;
* We give appropriate professional training and receive relevant and regular training on the impact of fraud and corruption within the supply chain;
* We keep up to date with new local and international legislation relating to malpractice in business, including fraud, corruption and bribery
* All suspected fraud (internal and partners) will be investigated by a Business Improvement Manager in line with our Audit policy, with employment or contract termination a possible outcome. Any suspected fraud would be raised with the Managing Authority in line with published processes.

**Making a Difference (South) Project**

With regard to the Making a Difference (South) Project (“the project”) within the European Social Fund (ESF) Programme, specific measures are in place.

* All financial transactions have segregation of roles between raising and approving orders, and authorising payments, as per the Trust’s financial procedures.
* All project deliverables and performance indicators will be subjected to multiple levels of checking and authorisation prior to being confirmed and claimed.
* There will be periodic sample-based checks undertaken by Education Development Trust staff external to the project on both the support activity and deliverables, and the ESF claims
* Project claim checking and approval are subject to segregated roles, including sign off by Assistant Director (South)
* Each staff member will undergo a project-specific induction which will include:
* briefings on the requirements to prevent and report fraudulent or unethical activity
* This will include an overview/examples of fraudulent activity within the context of the project (covering financial and performance indicator related aspects)
* What constitutes a conflict of interest and the need to disclose/declare any conflicts to ensure
* how to report or raise any concerns

EDT considers that the risks of fraudulent activity, their warning signs and measures in place to prevent such fraud within the project include:

* **Access to the scheme by ineligible participants:** Warning signs include lack of evidence of eligibility and high numbers of using alternative evidence or self-declaration by participant as eligibility evidence. Eligibility of every participant is checked by two different individuals. Internal audits and spot checks are also carried out by a different individual. Evidence of eligibility is required and self-declaration is to be used on an exceptional basis and only accepted with the Contract Manager’s approval.
* **Fraudulent or ineligible access to funds by participants or staff:** Warning signs include fund requests without evidence of requirement or use and consistently high requests from one Employment Coach or Participant. Payment of funds from the Flexible Fund is checked by at least two different individuals to confirm reason for use and eligibility (Employment Coach and Employer Engagement Manager, sometimes with additional approval by Contract Manager). Funds are also only paid to participants directly if they purchase an item themselves and the Fund reimburses them following provision of evidence and approval by an Employer Engagement Manager (please see Flexible Fund procedure for details) and any participant request over a certain amount requires approval by the Contract Manager (£50 for travel, £100 for clothing, £150 for childcare). Payment of any other funds within the project requires the approval of at least two different people.
* **EDT staff falsifying claims or results:** Warning signs include underperformance, numerous unusually quick results and results being achieved without activity or interaction between participant and Employment Coach. Results provided by Employment Coaches are checked by the Contracts and Compliance Co-ordinator. Internal audits and spot checks are also carried out by a different individual. Claims are prepared by the ESF Compliance Officer and separately checked by a Claim Reviewer with sign off by the Assistant Director (South), and are based on actual expenditure provided separately by finance.

Education Development Trust’s Corporate whistleblowing policy lays out the process by which concerns about possible fraud, malpractice and so on can be raised through an appropriate channel without fear of reprisal. Should concerns or evidence of any actual or suspected fraudulent activity in relation to the project arise:

1) A Business Improvement Manager will conduct appropriate investigative enquiries in the first instance, in line with the Trust’s established internal process

2) The Director of Careers and Employability will ensure that DWP are informed as soon as any suspicions are raised, and that any instructions issued by DWP, Audit Authority or their agents are strictly complied with as per ESF rules

3) Depending on the nature and origin of the issue(s) the Police may be informed if there is clear evidence of criminal wrongdoing

4) Any staff or contractors suspected may be suspended from duties pending investigation.

5) Safeguards to protect the anonymity and rights of person(s) making the disclosure of suspected fraud are enshrined in the Whistleblowing Policy.

This Policy Statement will be reviewed annually and updated in line with any additional ESF guidance and changes to applicable legislation.