

ANTI-FRAUD POLICY

Overview

The Lancashire Colleges Limited (TLC) understands its responsibility to maintain high legal, ethical and moral standards, to adhere to the principles of integrity objectivity and honesty and actively oppose fraud and corruption in all of its activities. TLC is committed to the elimination of any fraud within the organisation and to the rigorous investigation of any cases or suspected cases of fraud.

In applying this policy, TLC will establish a structure of communication and accountability which will clarify responsibilities and roles and will maintain an open and honest atmosphere within the organisation. This is in line with the requirements of the Public Interest Disclosure Act of 1999 which gave legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. A number of changes to whistleblowing protections came into force in June 2013 under the Enterprise and Regulatory Reform Act 2013 (ERRA).

Commitments

TLC considers that a wide range of misconducts including theft, corruption, embezzlement, bribery, forgery, misrepresentation, collusion, money laundering and concealment of material facts are all examples of fraud and covered by this policy, however this list is not exhaustive. TLC will not tolerate fraud and this policy will be rigorously enforced. TLC will:

- Establish financial and other policies and procedures which deter fraudulent activity.
- Promote a culture that facilitates the detection of fraud including through 'whistleblowing'.
- Offer protection to those employees who disclose concerns of actual or suspected fraud provided that such disclosure is made on the basis of reasonably held suspicions. For the purpose of this policy this shall include all suspicions other than those which are groundless and raise maliciously.
- Thoroughly investigate suspected cases of fraud and take immediate action in cases where fraud is found.

TLC reserves the right to:

- Inform the police immediately if fraud is suspected.
- Prosecute those suspected of fraud.
- Take appropriate steps to recover any assets lost as a result of fraud.

Responsibilities

TLC's Director has overall responsibility for managing the risk of fraud and corruption through the implementation of this policy and the Anti-Fraud Procedure and by ensuring that it is widely communicated and its effectiveness is monitored. They will:

- Undertake a regular review of this policy and assess the fraud risk associated with the individual projects and activities undertaken by TLC.
- Identify the fraud risks within TLC's internal systems and procedures, developing and

implementing effective controls to prevent and detect fraud.

- Ensure staff understand what fraud means and that they have a responsibility to prevent and detect fraud in the organisation and a duty to co-operate with any internal or external investigations.
- Embed a culture within the organisation so that staff feel able to confidentially report any concerns and suspicions of fraud and ensuring that staff receive support when they do so.
- Ensure that a report is made to TLC's Board at the earliest opportunity should any fraud or suspected fraud be identified.

Individual members of staff are responsible for:

- Ensuring they understand what fraud means and that they have a responsibility to prevent and detect fraud in the organisation and a duty to co-operate with any internal or external investigations undertaken.
- Confidentially reporting any concerns and suspicions of fraud to TLC's Director or TLC's Chair in the knowledge that they will receive support when they do so.
- Following TLC's financial and other procedures so that there is a clear segregation of duties for transactions including the payment of invoices and compilation of funding claims which ensures that no transaction may be completed by a single member of staff.
- Co-operating fully with any internal or external investigation covered by this policy.

The Lancashire Colleges Anti-Fraud Policy

Approved by: The Lancashire Colleges Directors at their meeting on 09 March 2022

Review due: No later than March 2024