



ALTERNATIVE PROVISION

Anti-Fraud Policy

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Approved by: [RAISE-AP Educational Directors](#)

Approval Signatures

*RAISE-AP
Directors*

Table of Contents

| | |
|---|----------|
| Introduction | 3 |
| Statement | 3 |
| Roles and Responsibilities | 4 |
| Reporting a Suspected Fraud..... | 4 |
| Responses to Allegations | 4 |
| Confidentiality and Safeguards | 5 |
| Raise Values | 5 |

Introduction

[RAISE-AP](#) is committed to ensuring that it acts with integrity and has high standards of personal conduct. Everyone involved with [RAISE-AP](#) has a responsibility in respect of preventing and detecting fraud. All staff and directors have a role to play. [RAISE-AP](#) also recognises the role of others in alerting them to areas where there is suspicion of fraud.

Recognising a potential fraud and being able to report it is just as important as the measures to prevent and detect. It is the duty of all employees and directors at [RAISE-AP](#) to take reasonable steps to limit the possibility of corrupt practices.

Any investigation carried out in relation to alleged irregularities is linked to the disciplinary & dismissals procedure.

Statement

This policy and procedure define Anti-Fraud and Corruption and offers guidance for all staff in [RAISE-AP](#).

[RAISE-AP](#) aims to be an honest and ethical institution. As such, it is opposed to fraud and seeks to eliminate fraud by the way it conducts provision business. This document sets out the provision's policy and procedures for dealing with the risk of significant fraud or corruption. In order to minimise the risk and impact of fraud, the provision's objectives are, firstly, to create a culture which deters fraudulent activity, encourages its prevention and promotes its detection and reporting and, secondly, to identify and document its response to cases of fraud and corrupt practices.

This policy, in line with [RAISE-AP](#) corporate values of integrity, consistency, impartiality, fairness and best practice, provides both staff and management with mutually understood guidelines for the administration of this procedure.

The scope of this procedure extends to all [RAISE-AP](#) employees, permanent, voluntary and fixed term. Time limits specified in this document may be extended by mutual agreement.

If there is concern or doubt about any aspect of a matter which involves an irregularity, or an ongoing investigation into a suspected irregularity, the best approach is to seek advice from the Head of Provision or if it relates to them the [RAISE-AP](#) educational directors.

If requested, employees may be accompanied by a recognised trade union representative or work colleague, not involved in any part of the process, at any interviews.

Roles and Responsibilities

[RAISE-AP](#) has adopted the following measures to demonstrate its commitment to anti-fraud and corruption:

- Educational directors meet regularly;
- A requirement for all staff to declare prejudicial interests and not contribute to business related to that interest;
- A requirement for staff to disclose personal interests;
- All staff are made aware of the understanding on the acceptance of gifts and hospitality;
- Clear recruitment policies and procedures;
- Anti-fraud awareness training to enable the business support function to identify potential fraudulent activities.

Staff and directors also have a duty to report another member of staff or director whose conduct is reasonably believed to represent a failure to comply with the above.

Reporting a Suspected Fraud

All allegations of suspected fraud and irregularities are to be brought to the attention of the [RAISE-AP](#) educational directors.

Please refer to the [RAISE-AP](#) Whistleblowing Policy for further guidance.

Responses to Allegations

The Head of Provision will have initial responsibility for co-ordinating the initial response. In doing this he/she will consult with the Human Resource advisors regarding potential employment issues.

The Head of Provision will also seek legal advice from the [RAISE-AP](#)'s solicitors on both employment and litigation issues before taking any further action.

The Head of Provision will ascertain whether or not the suspicions aroused have substance. In every case, and as soon as possible after the initial investigation, they will pass the matter on to the [RAISE-AP](#) educational directors. Even if there is no evidence to support the allegation, the matter must be reported.

This [RAISE-AP](#) educational directors will undertake the management of the investigation.

- They will, if appropriate, conduct a preliminary investigation to gather factual information and reach an initial view as to whether further action is required.
- They will determine whether the findings, conclusions and any recommendations arising from the preliminary investigation should be reported.
- If further investigations are required, they will determine which outside agencies should be involved.

The Head of Provision is required to notify the [RAISE-AP](#) educational directors of any serious financial irregularities. This action will be taken at the first opportunity following the completion of the initial investigations and will involve keeping the [RAISE-AP](#) educational directors fully informed.

If evidence of fraud is forthcoming, then the [RAISE-AP](#) educational directors will inform the Department for Education and will consider whether or not to refer the matter to the police.

Confidentiality and Safeguards

[RAISE-AP](#) recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the alleged malpractice. [RAISE-AP](#) will not tolerate harassment or victimisation and will do what it lawfully can to protect an individual when a concern is raised in good faith.

This does not mean that if the person raising the concern is already the subject of a disciplinary, redundancy or other procedure, that those procedures will be halted as a result of the concern being reported.

There is a need to ensure that the process is not misused. For further guidance refer to the [RAISE-AP](#) Whistleblowing, Grievance and Capability policies.

Raise Values

Our [RAISE-AP values](#) (Resolve, Attitude, Invest, Social Skills and Education) are key in everything we do, specifically with attitudes (modelling and expectations), invest (tailoring setup for our young people) social skills (becoming part of a community) which are linked to our Anti-Fraud policy.
