



SkillsReach - Anti-fraud, bribery and corruption policy

In Summary

- SkillsReach has a 'zero tolerance' policy towards fraud, bribery and corruption. We will always seek to take disciplinary and /or legal action against those found to have perpetrated fraud
- The company is committed to developing an anti-fraud culture and keeping the opportunities for fraud, bribery and corruption to the absolute minimum
- We will assess the risks of fraud, bribery and corruption, establish processes and controls to minimise these risks, and regularly review the effectiveness of our control systems
- We require all staff and associates to immediately report any incidents or suspicions of fraud, bribery or corruption. We will not penalise anyone for raising a concern in good faith
- We will take all reports of fraud, bribery and corruption seriously, and investigate proportionately and appropriately
- We requires suppliers, partners, contractors, associates and agents, to act in accordance with this policy. This includes reporting any suspected or actual instances of fraud, bribery or corruption involving staff

Introduction

1. SkillsReach is an organisation with a real passion for supporting business, communities and local economies to succeed through best investment in Skills, HR and Business Development. Integrity and systems excellence are at the heart of our company values and this policy reflects that belief. This applies across the board, but specifically to the ESF project, Employees Support in Skills 24-005 (ESF-2150 ITT-30117 Investment Priority: 2.1 Sector Skills Plans) to develop sector skills plans in New Anglia and our partnership with Bishop Grosseteste University (BGU) in Greater Lincolnshire for Specialist Skills Advisory services
2. SkillsReach complies with applicable legislation, including the Fraud Act 2006, the Bribery Act 2010, and with other regulatory requirements and applicable guidance
3. We are committed to conducting business fairly, openly and honestly and in accordance with the highest ethical and legal standards

Purpose

4. This policy sets out our stance on fraud, bribery and corruption and our approach to preventing, detecting, reporting and investigating fraud, bribery and corruption

Scope

5. This policy is applicable to, and must be followed by, all staff including associates and contractors. Failure to comply could result in disciplinary action, including dismissal

Policy Statement



6. SkillsReach has a 'zero tolerance' policy towards fraud, bribery and corruption. This means that we:
 - a) Do not accept any level of fraud, bribery or corruption within the organisation or by any other individual or organisation representing the business and
 - b) will always seek to take disciplinary and/or legal action against those found to have perpetrated, be involved in, or assisted with fraudulent or other improper activities
7. SkillsReach is committed to developing an anti-fraud culture and keeping the opportunities for fraud, bribery and corruption to the absolute minimum
8. SkillsReach requires all staff and associates to act honestly and with integrity at all times; and to safeguard the resources for which they are responsible

Risk and internal control systems

9. SkillsReach will regularly assess the nature and extent of its exposure to the risks of internal and external fraud, bribery and corruption
10. We will seek to put in place efficient and effective systems, procedures and internal controls to: encourage an anti-fraud culture; prevent and detect fraud, bribery and corruption; and reduce the risks to an acceptable level
11. We will seek to equip staff with the skills, knowledge and expertise to manage its fraud risk effectively
12. We will make suppliers, associates, partners, contractors and agents aware of this policy and it will be published on the SkillsReach website www.skillsreach.co.uk
13. We will work with relevant stakeholders, including comparable organisations, relevant regulators and government organizations to tackle fraud
14. We will regularly review and evaluate the effectiveness of our systems, procedures and internal controls for managing the risk of fraud

Reporting - internal

15. All staff / associates must immediately report any suspected or actual instances of fraud, bribery or corruption. Failure to report could result in disciplinary action. Reporting should be made directly to the Managing Director
16. SkillsReach will not penalise anyone for raising a concern in good faith, even if it turns out to be unfounded
17. SkillsReach will maintain a system for recording: all reports of actual or suspected fraud, bribery and corruption; the action taken; and the outcome of any investigation. We will use this information to inform its review of the risks and the effectiveness of its controls



Reporting – external

18. SkillsReach will fully meet its obligations to report fraud, bribery and corruption to third parties.

Investigation

19. SkillsReach will take all reports of actual or suspected fraud, bribery and corruption seriously, and investigate proportionately and appropriately
20. SkillsReach will always seek to take disciplinary and/or legal action against those found to have perpetrated or assisted with fraudulent or other improper activities in any of its operations. For staff, this may include dismissal. It will also seek to recover any assets lost through fraud.

Responsibilities

21. The **Principal Fraud Officer** is the Managing Director
22. **All staff / associates** are responsible for complying with this policy

Definitions

23. **Fraud** is knowingly making an untrue or misleading representation with the intention of making a gain for oneself or another or causing a loss, or risk of loss, to another
24. **Bribery** is giving or offering someone a financial or other advantage to encourage that person to perform their functions or activities improperly, or to reward someone for having already done so
25. **Corruption** is the misuse of entrusted power for personal gain. This would include dishonest or fraudulent behavior by those in positions of power, such as managers or government officials
26. A **conflict of interest** is where an individual has private interests that may or actually do influence the decisions that they make as an employee or representative of an organisation

Endorsed by: Roy Harper – Managing Director - SkillsReach

Signature:

Date: 01.011.2018