

## **Anti-fraud, Bribery and Corruption Policy**

Issue	Date	Sections Affected	Description of Change / Change Request Reference / Remarks	Amended & reviewed by
4	16/11/23	N/A	Reviewed	SB
4	11/11/24	N/A	Reviewed	CC

### **Purpose**

This policy communicates the Training Works approach to conducting business legitimately and with integrity, setting out the framework of policies and procedures in place to ensure that these standards are maintained to mitigate the occurrence of financial irregularity including fraud, bribery, or corruption.

### **Scope**

This policy covers any financial irregularity or suspected irregularity and applies to the Training Works Senior Management Team (SMT), Training Works employees; agents / representatives, outside agencies doing business with employees of Training Works (whether permanent, fixed term or temporary), and/or any other parties with a business relationship with Training Works.

### **Key Principles**

Training Works is committed to conducting business with the highest standards of honesty and integrity, operating in a responsible and transparent way. Training Works will not tolerate fraud, bribery, corruption and / or any conduct which results in the misreporting of the services we have delivered; the performance levels achieved or the funding to which we are entitled.

Training Works approach is to treat all allegations of financial irregularity, suspected fraud, bribery, or corruption seriously in accordance with our robust framework of

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policies and procedures (Annexe A). This includes promoting a culture of openness and accountability and supports the three key objectives of Training Works counter fraud approach to prevent, detect, and respond to the risk of financial irregularity in its business and supply chain:

### **Prevent**

- Implement appropriate policies and procedures to mitigate the risk of fraud, bribery or corruption including but not limited to effective governance structures, risk management processes and internal controls.
- Publish zero tolerance approach to fraud, bribery, and corruption to all staff and externally via company website.
- Set and communicate clear standards to staff and business partners including sanctions for breach of these requirements.

### **Detect**

- Operate a programme of staff training to raise awareness for potential fraud indicators.
- Implement management checking regimes to detect fraud, bribery, or corruption.
- Ensure staff have access to a range of routes to raise a concern.

### **Respond**

- Implement formal procedures in line with legislative requirements to investigate all allegations of suspected financial irregularity including fraud, bribery or corruption.
- Where irregularities occur, identify the root cause(s), and implement control improvements to mitigate the risk of occurrence.
- Operate effective disciplinary procedures for staff involved in any financial irregularity.
- Make contract decisions where financial irregularities are found in suppliers' delivery.
- Refer suspected or actual criminal activity by staff or suppliers to the Police.
- Support the Police in the prosecution of potentially criminal activity.
- Seek to recover any financial losses through fraud, bribery, and corruption.
- Take disciplinary action where our own staff are implicated and if criminal activity is suspected refer the employee, or business partner to the Police.

The process of mitigating risk to the business through fraud, financial irregularity, bribery and corruption is constantly changing as the business, the sectors in which we operate, and the relevant legislation continually evolves. We promote consistent organisational behaviour by providing guidelines and assigning responsibility for the development and implementation of effective operational processes and controls to

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mitigate the risk and have set procedures outlining how investigations in relation to financial irregularity, fraud, bribery and / or corruption is carried out.

### **Annexe A**

The company policies and standards that form the basis of the Training Works anti-fraud and bribery approach are summarised below:

- Code of Conduct
  - Details the expectations of all employee's behaviour, incorporating Accepting gifts & hospitality; conflicts of interest; confidentiality; criminal acts / offences and whistleblowing.
- Personal Relationships at Work
  - Friendships and close personal relationships with colleagues in the business MUST be disclosed to the SMT.
- Whistleblowing Policy
  - This covers the disclosure internally by employees and those working on behalf of Training Works, of malpractice as well as illegal acts or omissions.
- Anti-Bribery & Corruption Policy
  - This policy states Training Works commitment to honest and ethical business practices and behaviours, compliant with the Bribery Act. It applies to all staff and business partners.
- Fraud Response Protocol
  - Training Works will investigate ALL allegations of financial irregularity including theft, fraud, or bribery. The Police will be involved in all suspected cases. Employees have an opportunity to raise any concerns anonymously, via our Whistleblowing Policy.
- Acceptable Use Policy
  - This policy assists the business in ensuring that its IT facilities are used responsibly, protecting both the information held on Training

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Works IT systems, which is a key asset, and the reputation of the business.