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Anti-Fraud and Corruption Policy

Updated 22.12.21 - HD

**Anti-Fraud and Corruption Policy**

**Aim and Scope**

CANTO Learning Ltd is a small charitable based college that receives a large portion of its funding through public funds and as such has a duty to ensure the responsible discharging of funds ensuring that these are used with integrity.

CANTO Learning is committed to preventing fraud and corruption, whether it is attempted internally or externally. As part of this, CANTO Learning has committed to having effective measures in place to prevent and detect fraud and corruption. CANTO Learning Ltd expects all staff and trustees to carry out their roles in accordance with legal requirements and internal codes of practice.

For the purposes of this policy the following definitions apply.

Theft is *the taking of another person's property or services without that person's permission or consent with the intent to deprive the rightful owner of it*.

Fraud is the *intentional deception to secure unfair or unlawful gain, or to deprive a legal right. Fraud can violate civil law, a criminal law, or it may cause no loss of money, property or legal right but still be an element of another civil or criminal wrong.*

It is to note the clear distinction between accidental error/negligence and Fraud. In the case of negligence/accidental error no intent exists.

Corruption *is a form of dishonesty or criminal activity undertaken by a person or organisation entrusted with a position of authority, often to acquire illicit benefit, or, abuse of entrusted power for one's private gain.*

**College Culture**

Staff and Trustees are expected and are encouraged to raise any concerns relating to fraud and corruption. It is the responsibility of all on the senior leadership team to ensure that staff are aware of what their expectations are in relation to the organisation’s codes of conduct. The college expects staff and trustees to ensure that all procedures and practices are beyond reproach.

The College requires that all individuals or organisations with whom it holds a contract behave with integrity and with no intent to commit, or actions leading to, fraud and corruption.

**Preventative Steps**

College staff are encouraged to raise any concerns they may have through the use of the College’s whistleblowing policy (see staff handbook).

The college has implemented effective systems to safeguard against incidents of fraud or corruption. These include a regular external audit as part of its responsibilities as a charity. In addition to this a finance committee oversee all the financial activities of the organisation and report their findings to the board of trustees on a regular basis. Records of these meetings are taken for audit purposes.

Staff recruitment is undertaken in accordance with the college’s procedures and in line with employment law. Appropriate checks are undertaken and made before any appointment.

Staff are required to disclose offers of gifts or hospitality should this have the potential to impact on their judgement. Should this occur a record of all gifts should be made.

If staff have any concerns they should raise these with a member of the senior leadership team.

All members of the senior leadership team have a responsibility to investigate and highlight any irregularities they may see.

Should any concerns be raised these should be directed towards firstly the Finance Director, the Head and the Finance committee if a fraud or other irregularity is suspected.

The College will take appropriate action following an investigation including disciplinary action, civil recovery and referral to the Police.

In certain cases it may be appropriate for the college to work with other agencies in the case of fraud and corruption.

**The College’s commitment**

The college has in place clear processes to deter and investigate fraud and corruption. It will ensure that these arrangements are fair, monitored and updated.

Useful Contacts for advice or action.

[www.actionfraud.police.uk](http://www.actionfraud.police.uk)