

Anti-Fraud Statement

West London Careers Hub

Version Number	Date issued	Summary of changes	In consultation with	Approved by	Method used to confirm receipt	CPD opportunities where appropriate
1	01/06/2022	N/A	N/A	Aarti Jaswal	Email	N/A

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Overview

Education Development Trust is committed to high ethical and moral standards in the conduct of all its activities, based on the “Nolan Principles” established by the Committee on Standards in Public Life.

Adherence to these principles is expected and secured contractually from all employees and contractors, and a culture which fosters this is supported by specific policies and procedures, including our Code of Conduct and Whistleblowing Policy.

EDT has committed to the Chartered Institute of Procurement and Supply’s Code of Ethics. This ensures our commitment to eradicating unethical business practices including bribery, fraud and corruption. Through this commitment we ensure that:

- All employees involved in sourcing and supplier management are aware of and understand the Trust’s ethical code, and how it relates to procurement and supply management; forming part of new staff induction and ongoing performance measurement objectives.
- We give appropriate professional training and receive relevant and regular training on the impact of fraud and corruption within the supply chain.
- We keep up to date with new local and international legislation relating to malpractice in business, including fraud, corruption and bribery.
- All suspected fraud (internal and partners) will be investigated by a Business Improvement Manager in line with our Audit policy, with employment or contract termination a possible outcome. Any suspected fraud would be raised with the Managing Authority in line with published processes.

West London Careers Hubs

With regards to West London Careers Hubs (‘the project’), specific measures are in place.

- All financial transactions have segregation of roles between raising and approving orders, and authorising payments, as per the Trust’s financial procedures.
- All project deliverables and performance indicators will be subjected to multiple levels of checking and authorisation prior to being confirmed and claimed.
- There will be periodic sample-based checks undertaken by Education Development Trust staff external to the project on both the support activity and deliverables, and the project budget and claims.
- Project claim checking and approval are subject to segregated roles, including sign off by the Strategic Hub Lead.
- Each staff member will undergo a project-specific induction which will include:

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- briefings on the requirements to prevent and report fraudulent or unethical activity.
- an overview/examples of fraudulent activity within the context of the project (covering financial and performance indicator related aspects).
- what constitutes a conflict of interest and the need to disclose/declare any conflicts.
- how to report or raise any concerns.

EDT considers that the risks of fraudulent activity, their warning signs and measures in place to prevent such fraud within the project include:

- **EDT staff falsifying claims or outcomes:** Warning signs include underperformance, numerous unusually quick outcomes, and outcomes being achieved without activity or interaction recorded between project staff and the school, student or employer. Strand 1 is grant-funded and claims are prepared by Finance staff with oversight and approval from the Strategic Hub Lead. Strand 2 is payment-by-results and evidence is collated by the Relationship Manager, checked by the Contract Compliance Coordinator then uploaded to the relevant systems and claimed with sign-off by the Strategic Hub Lead. Guidance is in place for project staff regarding evidence requirements, including ensuring the source of any electronic documents is clear and evidenced (e.g. covering emails).
- **Access to the scheme by ineligible beneficiaries:** Warning signs include lack of evidence of eligibility. The eligibility of employer beneficiaries (SMEs) must be confirmed with appropriate eligibility evidence, which is checked against the eligibility requirements and also to confirm employers are only claimed against one project strand. Eligibility is checked by the Contract Compliance Coordinator and signed off by the Strategic Hub Lead.

Education Development Trust's Corporate whistleblowing policy lays out the process by which concerns about possible fraud, malpractice and so on can be raised through an appropriate channel without fear of reprisal. Should concerns or evidence of any actual or suspected fraudulent activity in relation to the project arise:

- 1) A Business Improvement Manager will conduct appropriate investigative enquiries in the first instance, in line with the Trust's established internal process.
- 2) The Director of Employability and Careers will ensure that the Greater London Authority and ESF Managing Authority are informed as soon as any suspicions are raised, and that any instructions issued by the Greater London Authority, the Managing Authority, Audit Authority or their agents are strictly complied with as per ESF rules.
- 3) Depending on the nature and origin of the issue(s) the Police may be informed if there is clear evidence of criminal wrongdoing.
- 4) Any staff or contractors suspected may be suspended from duties pending investigation.
- 5) Safeguards to protect the anonymity and rights of person(s) making the disclosure of suspected fraud are enshrined in the Whistleblowing Policy.

This Policy Statement will be reviewed annually and updated in line with any additional ESF guidance and changes to applicable legislation.