Anti Fraud and Corruption Policy

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1.0 Introduction

1.1 One of the essential functions of public sector organisations is to ensure the proper use of public funds. This policy sets out NGTC's position in the prevention of and response to fraud and corruption.

1.2 In developing this policy, Arena Learning has taken account of existing external guidance and legislation, including the UK Corporate Governance Code 2018 and Bribery Act 2010.

1.3 Arena Learning will treat any instances of fraud or corruption by its employees, board members, or contractors as serious breaches of discipline and as potentially criminal acts. Bribery of or by any Arena Learning employee or contractor for either personal or organisational gain will be similarly treated. Arena Learning will co-operate fully with any criminal investigations carried out in response to instances of fraud, corruption or bribery.

2.0 Scope

2.1 This policy forms part of Arena Leanring's internal control and corporate governance arrangements.

2.2 The policy applies to all activities undertaken on behalf of Arena Learning by members of the Senior Management Team and all staff of Arena Learning and its partners.

3.0 Key Principles

3.1 The results of fraud and/or corruption can be costly, time-consuming, disruptive and unpleasant. Arena Learning, therefore, sees that the overriding principle to be applied is that of prevention. Where this fails, however, then reporting, investigation and, where necessary, sanctions, will be pursued rigorously and swiftly.

3.2 Preventative measures are identified under five broad headings: -

3.2.1 Policies and Procedures

Arena Learning shall develop, implement and maintain such policies and procedures so as to reduce, as far as possible, the risks from fraud or corruption. These will include: -

- Financial Regulations
- Scheme of Administration
- Financial Procedures

3.2.2 Systems

Arena Learning will maintain in place systems which incorporate internal controls, including adequate segregation of duties to ensure that, as far as possible, fraud and corruption can be prevented.

3.2.3 Internal Audit

Arena Learning will ensure that it agrees a programme of internal audit assignments to support the systems and procedures already in place and to assist in the reduction of the likelihood of fraud.

3.2.4 Culture

Arena Learning will maintain a culture of openness, honesty and accountability. This will be supported by the Whistleblowing Policy.

3.2.5 Staff Recruitment and Training

Arena Learning will ensure references are taken up for all permanent and temporary staff. As part of induction, staff will be made aware of all policies and procedures pertinent to their post, including those concerning governance.

3.3 The principles to be observed for the reporting and investigation of fraud and corruption are as follows: -

3.3.1 Concerns should be reported in accordance with Arena Learning's

Whistleblowing Policy. A detailed investigation of any concerns will be undertaken.

3.3.2 Arena Learning will deal with any instances of fraud or corruption swiftly, taking disciplinary action as necessary and informing the partner college & police if appropriate.

3.3.3 In the event that fraud is suspected on the part of contractors, agency workers or by staff involved in agency or contract work on behalf of other bodies, procedures and responsibilities for reporting and investigation are the same as for staff. Arena Learning will also inform and involve partner colleges or agencies when appropriate.

4.0 Responsibilities

4.1 The Senior Management Team is responsible for ensuring the effectiveness of internal control of Arena Learning, based on information provided by the Senior Management Team.

4.2 The Senior Management Team is responsible for agreeing this policy and monitoring its implementation and effectiveness.

4.3 The Senior Management Team is responsible for developing

appropriate systems of internal control to reduce the likelihood and impact of fraud or corruption.

4.4 The Managing Director is responsible for the implementation of this Policy. 4.5 Departmental managers are responsible for the application of internal controls to mitigate risks within their specified areas of responsibility.

4.6 All staff members are responsible for adhering to the systems of internal control which are relevant to their role.