PROMISE TRAINING CENTRE

FRAUD AND FINANCIAL IRREGARLITY POLICY & PROCEDURE

This document sets out the policy and procedures of Promise Training Centre against fraud and other forms of financial irregularity, together with the steps that must be taken where any of these practices is suspected or discovered

The above policy and procedure applies to all Promise training staff including Managing Director, Management, tutors and administrators. Any member of staff who commits fraud, theft or any other financial irregularity, or who becomes aware of it and does not report it, will be subject to appropriate disciplinary action

1. Statement of intent

Promise Training Centre will continually strive to ensure that all its financial and administrative process are carried out and reported honestly, accurately, transparently and accountable and that all decisions are taken objectively and free of personal interest. Promise Training will not condone any behaviour that falls short of these principles

All members of the organisation have a responsibility for putting these principles into practices and for reporting any breaches they discover

2. Definitions

Fraud A deliberate intent to acquire money or goods dishonestly through the falsification of records or documents. The deliberate changing of financial statements or records by wither; a member of the public, someone who works or is a volunteer for Promise Training centre. The criminal act is the attempt to deceive and attempted fraud is therefore treated as seriously as accomplished fraud

Financial irregularity Include theft or misappropriation of funds, supplies, property or other resources, misreporting hours worked, fraud or deliberate errors in the preparation, evaluation, review or audit of any financial statement of Promise Training Centre

Theft Dishonestly acquiring, suing or disposing of physical or intellectual property belonging to Promise Training or to individual members of the organisation

3. Responsibilities

In relation to the prevention of fraud, theft and financial irregularity, specific responsibilities are as follows:

a) Managing Director/Company Owner

The Director are responsible for establishing and maintaining a sound system of internal control that supports Promise Training Centre policies, aims and objectives

The system of internal control is designed to and manage the whole range of risks that Promise Training may face

The Managing Director has overall responsibility for managing risk of fraud, this will include

- Undertaking a regular review of the fraud risks associated with the organisation
- Establishing appropriate mechanisms for reporting fraud risks issues
- Making sure that all staff are aware of the fraud and financial irregularity policy and procedures
- Ensure that appropriate action is taken to minimise the risk of frauds occurring in future
- Ensure where appropriate that training is available to staff, Directors and volunteers

The Management Team are responsible for

- Ensuring that an adequate system of internal controls exists within their area of responsibility and that controls operate effectively
- Preventing and detecting fraud as far as possible
- Assessing the types of risks involved in the operations for which they are responsible
- Reviewing the control systems

Staff and volunteers

All staff members or volunteers are responsible for the following:

- Acting with propriety in the use of Promise Training resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers
- Being alert to the possibility that unusual events or transactions could be indicators of fraud
- Alerting their manager when they believe the opportunity for fraud exists, e.g., because of poor procedures or lack of effective oversight
- Reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events, and
- Cooperate fully with whoever is conducting internal checks or reviews or fraud investigations

Detection and Investigation

Promise Training will actively participate in the exchange of information with external agencies and in regards to the requirements of the Data Protection Act 1998 on fraud and corruption, often it is the alertness of Directors, staff and the public to the possibility of fraud and corruption that leads to detection of financial irregularity

The Managing Director/Company Owner must be informed immediately of all financial or accounting irregularities or suspected irregularities or of any circumstances which may suggest the possibility of irregularities including cash, stores, property, remuneration or allowances

Named Person responsible for investigating fraudulent activities: Financial Director

Reporting of suspected irregularities is essential as it:

- Facilitates a proper investigation by experienced staff, and ensures the consistent treatment of information by appointing a designated officer, regarding fraud and corruption.
- When notified, the MD will instigate an investigation by appointing a designated officer, auditor or other advisor

The designated officer will

- deal with the matter
- record evidence received
- ensure the security an d confidentiality of evidence
- Work closely with the Managing Director/Company Owner and other external agencies, such as the police etc.,
- Ensure that maximum recoveries are made on behalf of the organisation and support senior management to implement disciplinary procedures where applicable

Review

This Policy will be reviewed on an annual basis