

Anti-fraud, Bribery and Corruption Policy

Policy

The following statement outlines the Organisational policy across BCTG Limited.

Policy Aim

This policy is designed to ensure that all staff and partners working with or on behalf of BCTG understand our commitment to the provision of services which meet legal requirements and understand that firm action will be taken where any instances of fraud, bribery or corruption are suspected. The primary aims of this policy are to minimise the risk of any fraud occurring within BCTG, and to optimise the likelihood of its detection as soon as possible, leading to full investigation.

Principles underpinning the policy:

BCTG aims to be an honest and ethical organisation, seeking to conduct its business to the highest standards of integrity and objectivity.

In order to protect its financial systems, resources, and assets, and the honesty and integrity of its staff and partners, it is important that BCTG have an established policy in place to minimise the risk and impact of fraudulent or corrupt activity.

It is the responsibility and duty of all staff, learners, and partners to co-operate, conform and comply with the requirements of this policy.

BCTG retains the right to conduct a full investigation of any allegation or possible irregularity in order to satisfy itself that all activities undertaken are legal and comply with both the requirements and spirit of any contract or funding agreement.

Any employee, individual or organisation undertaking work on behalf of BCTG shall notify us immediately of any instance of suspected fraud or financial irregularity in the delivery of project initiatives, programmes or services.

Related Policies

- Whistleblowing Policy
- Customer Complaints

Strategic implementation of the policy

1. All partners are required to co-operate, conform, and comply with the requirements of this policy

2. All instances of potential malpractice or fraudulent activity will be reported immediately to the Chief Executive. The investigation process will be led by a Senior Manager or where appropriate directly by the Chief Executive.
3. Where the allegation relates to a BCTG employee, a full investigation will be undertaken by the staff member's immediate manager and where necessary the Chief Executive. The investigation will follow the processes outlined in the current Staff Handbook. Depending on the circumstances the staff member may be suspended with or without pay until a full investigation has been conducted.
4. Where the allegation relates to a sub-contracted partner, all payments due to the organisation will be withheld until a full investigation has been undertaken and a satisfactory conclusion reached.
5. We will advise the appropriate Funding Agency of our concerns regarding the sub-contracted partner, and where appropriate notify other Lead Providers who also fund the organisation.
6. We will actively collaborate with other Lead Providers and where appropriate conduct joint investigations where there is concern that malpractice may cover learners funded by other organisations.
7. As part of the investigation, our sub-contract agreement allows the right of immediate access to the sub-contracted partner's premises at any reasonable time with or without notice to examine and remove or copy all relevant documents and records and to interview the contractors' staff and/or agents engaged with the delivery of the Contract.
8. Where an allegation is made by a whistle blower, at the earliest opportunity BCTG will take steps to verify their complaint for authenticity and accuracy.
9. As part of the investigation, we may contact third party organisations such as Awarding Bodies, or interview learners, employers, or whistle-blowers to collect evidence.
10. Where appropriate we will engage the services of external Forensic Audit specialists to undertake work as part of the investigation. These costs will be met by the sub-contracted partner as outlined in our Sub-contract agreement.
11. If the investigation identifies that an employee has 'a case to answer', the company disciplinary procedure will be applied. Where it is proven that there has been an instance of malpractice or fraud it will be considered as Gross Misconduct, and the individual may be subject to summary dismissal.
12. Where it is identified that a member of staff or freelance agent of a subcontracted partner has committed fraudulent or inappropriate acts, any contract with us will be terminated with immediate effect. We will take steps to ensure the validity of any current and past payments made to the organisation (or individual), and where necessary take steps, including legal action, to recover any funds incorrectly claimed (or paid). We will also advise any third parties of the outcome including Funding Bodies. Where appropriate we will also notify the Police or other enforcing authority.
13. We will not divulge the ongoing findings of any investigation to the organisation or individual concerned until the process is fully completed and a final conclusion made.

Policy outcomes

Adherence to this policy will ensure that BCTG retains its reputation for financial probity.

Policy review

This policy will be reviewed annually by the BCTG Advisory Board.

January 2024