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January 2023

## **Anti- Fraud Policy Statement for Higher PLACE – A project part-funded by the European Social Fund**

### Project statement

In line with the 'Responsibilities of ESF Beneficiaries in the prevention and detection of fraud in ESF projects' guidance (2016), Higher PLACE is committed to maintaining an honest, open and well-intentioned atmosphere and to the elimination of any wrongdoing, and to the rigorous investigation and punishment of any such cases.

To support this, all individuals involved in Higher PLACE are expected to observe at all times the fundamental precepts of accountability, probity and openness to be aware of both the risks and the need for vigilance at all times.

Higher PLACE promotes a culture that deters fraudulent activity and has robust procedures in place both to detect fraud and to reduce the likelihood of these acts occurring, including financial regulations and procedures, codes of conduct and systems for internal control and compliance auditing.

In the context of ESF project activity, fraud is taken to mean the intentional distortion of financial statements, participant records or activity reporting which is carried out to conceal the misappropriation of assets for gain or undue advantage.

The range of potential acts of wrongdoing are many and various, but would include such instances as:

- Theft of cash or cash equivalents
- Theft of property procured using ESF project funds
- All frauds with potential for direct pecuniary loss, such as the submission of invalid travel claims, timesheets for salary payments or learner records
- All frauds involving inappropriate use of project property (including intellectual property) or resources for personal gain
- Embezzlement
- Corruption
- Forgery
- Misrepresentation
- Collusion
- Money laundering
- Concealment of material facts
- Conflicts of interest such as :No segregation of duties for financial processes



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In the event of any staff member becoming aware of an irregular occurrence relating to ESF activity, they should act in the knowledge that they are able to report the matter in confidence to their line manager, or to alternative senior management or governor representatives.

Staff will be protected from any disciplinary action or other detriment in raising a genuine concern about fraud regarding of whether the subsequent investigation substantiates that concern.

The ESF beneficiary will report to MA at the earliest opportunity should any fraud or suspected fraud be identified in their project

Higher PLACE will fully co-operate with the Managing Authority and Treasury in the investigation of fraud and related offences.

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Name and Role	Andrew Wheeler – Executive Director Curriculum Initiatives