FRAUD POLICY

1. Introduction

This Fraud Policy outlines the approach and procedures to prevent, detect, and respond to fraud within Chiltern Learning Trust. It specifically addresses cyber-related fraud, which refers to fraudulent activities conducted through electronic means, including but not limited to hacking, phishing, identity theft, and data breaches.

2. Policy Objectives

The objectives of this policy are as follows:

1. To establish a culture of honesty, integrity, and transparency within CLT
2. To prevent and deter fraud, including cyber-related fraud, by implementing robust controls and procedures.
3. To provide guidance to employees, contractors, and stakeholders on recognising, reporting, and managing fraud incidents.
4. To ensure that fraud incidents are promptly and effectively investigated, and appropriate action is taken.
5. To cooperate with law enforcement agencies and other relevant authorities in the investigation and prosecution of fraud cases.

3. Responsibilities

3.1 The Board of Trustees

Is responsible for:

1. Approving and reviewing this Fraud Policy and associated procedures reviewed by the audit committee.
2. Ensuring adequate resources are allocated for fraud prevention and detection.
3. Ensuring the Chief Executive/Chief Finance Officer (CFO) have responsibility for overseeing fraud prevention efforts.
4. Providing oversight and support to the CFO and management team in implementing fraud prevention measures.

3.2 Management Team (CFO, ICT Manager, GDPR Lead, Finance Manager)

Is responsible for:

1. Implementing effective controls and procedures to prevent and detect fraud.
2. Ensuring staff members are aware of the Fraud Policy and receive appropriate training.
3. Promoting a culture of integrity, transparency, and ethical behaviour.

4. Reporting suspected fraud incidents to the Accounting Officer via the CFO and cooperating fully in any investigations.

3.3 Chief Executive/CFO

Is responsible for:

1. Developing and maintaining fraud prevention strategies and procedures.
2. Raising awareness of fraud risks and prevention measures among employees and stakeholders.
3. Investigating suspected fraud incidents promptly and thoroughly.
4. Reporting fraud incidents to the Board of Trustees and to the appropriate authorities, such as law enforcement agencies or regulatory bodies.
5. Providing regular reports to the Board of Trustees on fraud prevention and detection activities.

4. Fraud Prevention Measures

To prevent cyber-related fraud and other forms of fraud, CLT implement the following measures:

1. Strong access controls and user authentication protocols to protect sensitive data and systems.
2. Regularly update and patch software and systems to address vulnerabilities.
3. Provide training and awareness programs for employees, contractors, and stakeholders to recognise and report fraud.
4. Conduct periodic risk assessments to identify vulnerabilities and mitigate potential fraud risks.
5. Maintain up-to-date antivirus and anti-malware software on all devices.
6. Secure backup and recovery procedures for critical data.
7. Secure payment processes, including two-factor authentication for financial transactions.
8. Regularly review and monitor network logs and security systems for suspicious activities.
9. Limit access to sensitive information on a need-to-know basis.
10. Clear policies on the acceptable use of information systems and devices.

5. Reporting and Investigation Procedures

1. All employees, contractors, and stakeholders have a responsibility to report suspected fraud incidents promptly to their line manager or the designated reporting channels.
2. The Trust will maintain a confidential and secure reporting mechanism for reporting fraud incidents.
3. Upon receiving a fraud report, the CFO will conduct a preliminary assessment to determine the appropriate course of action, including initiating an investigation if necessary.

4. Investigations will be conducted in a timely, fair, and confidential manner, with due regard to the rights of all individuals involved.
5. The Trust will cooperate fully with law enforcement agencies and other relevant authorities in the investigation and prosecution of fraud cases.
6. Disciplinary actions, including termination of employment or legal action, will be taken against individuals found guilty of fraud.

6. Policy Review

This Fraud Policy will be reviewed periodically to ensure its effectiveness and compliance with legal and regulatory requirements. Any necessary updates or amendments will be made in consultation with the Board of Trustees and relevant stakeholders.

7. Communication and Training

The Trust will communicate this Fraud Policy to all employees, contractors, and stakeholders and provide appropriate training to ensure understanding and compliance. Regular awareness campaigns and updates on fraud prevention measures will be conducted to maintain a high level of vigilance within the organisation.

8. Conclusion

The Trust is committed to maintaining the highest standards of honesty, integrity, and transparency. By implementing robust fraud prevention measures and promptly addressing fraud incidents, the Trust aims to protect its assets, reputation, and the interests of all stakeholders.