

## **Anti-fraud, Malpractice and Maladministration Policy**

### **1 Introduction**

- a) This policy aims to protect the integrity, reliability and reputation of Boss Training Limited
- b) This policy relates to supplier, instructors, delivery/administration staff, candidates and learners;
- c) This policy sets out the process for reporting and any investigation;

### **2 Policy aims and objectives**

The policy sets out the process an individual or organisation needs to follow to report cases of alleged fraud (including bribery), malpractice and maladministration.

The policy will detail how alleged cases should be reported and the time scales in which Boss Training Limited will investigate and act upon its findings.

The policy will also layout how Boss Training Limited will deal with alleged cases if the allegations are proven.

### **3 Access to the policy**

Boss Training will ensure that the policy is communicated and understood by centre staff through its team of quality Managers and employed instructors. The quality Management team will, through the scheduled and un-scheduled monitoring visits, explain the policy to Centre staff and answer any questions relating to the policy.

### **4 Definitions**

Malpractice/maladministration is a deliberate or reckless act of an individual or business to dishonestly claim learning outcomes and or certificates for candidates, delegates and learners. Furthermore malpractice/maladministration is an act that does not comply with regulatory authority's conditions and brings the authenticity, reliability and integrity of a qualification or learning outcome into question.

Fraud is a criminal activity defined as an act of deception intended for personal gain or to cause loss to another person or party.

This can include theft, the misuse of funds or resources, failure to disclose information, false representation or abuse of a position of trust.

As well as the above, the term "fraud" is also used to describe acts such as deception, bribery, forgery, extortion, corruption, conspiracy, embezzlement, misappropriation, money laundering and collusion. Fraud can affect individuals, businesses, charities, the treasury or the industry as a whole.

Corruption is the abuse of entrusted power for personal gain. This can involve a party being influenced in exchange for a reward or a promise or the expectation of a reward to unreasonably use their position to gain some advantage to another. In this context, reward need not be financial.

Examples of malpractice/maladministration/fraud could be, but are not limited to:

### **5 Delegate/candidate malpractice/maladministration/fraud**

- a) plagiarism of work;
- b) forgery of candidate/delegate evidence;
- c) forgery of signatures.

## **6 Training centre malpractice/maladministration/fraud**

- a) failure to follow Boss Training's requirements for centre approval including action plans;
- b) failure to allow the quality management team or authorized regulator access to centre, records and candidates when requested without good reason;
- c) unqualified trainers, assessor and quality assurance staff claiming learning outcomes;
- d) fraudulent claims for certificates or course completion with possible links to grant payments;
- e) absence of quality management systems as required by Boss Training standards;
- f) failure to follow invigilation guidelines or other externally set requirements from any awarding organisations/regulators and accredited courses;
- g) failure to input candidates/delegate information in a timely manner or intentionally adding incorrect details on to the Construction Training Register/ Boss Data Base/PASMA/ IPAF and UKATA system;
- h) sharing of confidential passwords to any systems.

## **7 Training and assessment staff malpractice/maladministration/fraud**

- a) forgery or tampering with assessments and training records;
- b) forgery of signatures;
- c) forgery or tampering candidate/delegate evidence.

## **8 Reporting process**

Anyone involved in the training delivery at our centres that have had an instance of alleged malpractice/maladministration/fraud brought to their attention, is duty bound to report it to Boss Training Limited. Every reasonable effort will be made to protect the identity of the person making the report.

Boss Training Limited will accept any written report hand written or email and/or letter that sets out the details of the alleged malpractice/maladministration the correspondence must be sufficiently detailed to allow an investigation to commence.

Please ensure that the following information is included in any correspondence:

- a) Centre name and address
- b) Reporting person's name, job title
- d) candidate/delegate name(s) and number(s) of those affected or involved;
- e) individuals involved;
- f) Programme details (i.e. qualification/accreditation involved);
- g) The details of the allegation including dates, times and venues.

## **9 Reporting process for recognised qualifications**

For qualifications that are awarded via other awarding organisations, the relevant malpractice/maladministration policy must be followed by the centre.

All centres and Instructors are required to make Boss Training Limited aware of any instances of alleged malpractice/maladministration.

Boss Training Limited reserves the right to take any reasonable action to safeguard candidates/delegates/employers interests.

## **10 Investigation process**

Upon receipt of this information, Boss Training will confirm receipt in writing and detail the process for investigating the alleged malpractice/maladministration within 10 working days.

The investigators will where practically carry out the investigation remotely and the process will be concluded within 28 working days. However, if further enquiries are required, then arrangements will be made for the centre to be visited and interviews conducted with the people involved.

Boss Training reserves the right to extend the amount of time to conclude an investigation to ensure thorough and appropriate action can be taken.

Following the investigation, we will detail our findings in a letter to the authorised representative along with any remedial action required by the Instructor/centre/supplier/or individual. This report will be sent within five working days following the completion of the investigation.

There is an expectation that all parties that are involved in the investigation process co-operate with Boss Training quality management staff. Failure to cooperate at any stage of the investigation process will result in sanctions being applied to the Instructor/centre/supplier. Where relevant, third party organisations will be made aware of suspected malpractice/maladministration/fraud.

From time to time, the investigation will require additional information to be supplied. Boss Training will be clear on what is required, the format and the deadline to supply the additional information.

Boss Training reserves the right to interview anyone involved in the delivery process that may be able to provide evidence about the suspected malpractice/maladministration/fraud. If the investigation requires a visit, this will be arranged. The date given to the Instructor/centre/Supplier will normally have a short lead time.

Boss Training will use staff that has an understanding of that particular Instructor/centre and course to guide investigators. The investigation and findings will be conducted by impartial staff. The Instructor/centre/supplier will be given the name of the investigators prior to the investigation. It is the centres responsibility to inform Boss Training in writing if there is a conflict of interest before the investigation commences.

## **11 Investigation findings**

Boss Training will make an informed decision based on the investigation's findings. Boss Training will exercise due diligence when formalising its decision, using the evidence gathered during the investigation.

For candidate/delegate and Instructors/centre/supplier malpractice/maladministration/fraud, Boss Training findings will be presented to the authorised representative (or named head of centre), either face to face or by written letter.

The representative (or named head of centre) will be involved with setting the action plan before it is put in place. As required, the quality management team will provide guidance on the actions plan and how to meet any given points.

## **12 Centre malpractice, maladministration or fraud**

If malpractice/maladministration/fraud has been identified at instructor/centre level, or with anyone employed by Boss Training, the sanctions that are applied will be in accordance with their contract.

### **13 Candidate malpractice, maladministration or fraud**

If the malpractice/maladministration is at a candidate/delegate level, the individual(s) may be removed from the training programme or have their achievement removed from the relevant regulatory authority's conditions/accrediting body and the Boss Training Data Base.

The instructor/centre will be given an action plan to prevent further occurrences of candidate/delegate malpractice/maladministration/fraud.

Boss Training will keep any relevant regulatory authorities apprised of the investigation, findings and conclusion. In line with this,

Boss Training will if required, remove achievements to protect the integrity of the training provided.

### **14 Appeals**

If you do not agree with the findings of the investigation, you can appeal by contacting Stacy Stanger Accounts Manager Email [stacy@bosstraining.co.uk](mailto:stacy@bosstraining.co.uk). You must clearly state the grounds behind the appeal. It cannot be simply that you disagreed with the decision.

The appeal must be made within 10 working days of the date of the correspondence. The Company will investigate the appeal and respond within 28 days