

Ginger Nut Training.



Document Title

Counter Fraud and Error Policy

Originator

Dan Williams

Responsible Person

Jim Thomas

Date of Approval

August 2026

Policy Due for Renewal

August 2027

Version

1.2

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Purpose

The purpose of this policy is to establish guidelines and procedures to prevent, detect, and address fraud, error, and irregularities within Ginger Nut Training. By adhering to this policy, we aim to maintain the integrity of our operations, protect public funds, and ensure compliance with relevant regulations. As an organisation we have a duty to our stakeholders to take all reasonable steps to prevent fraud and theft occurring. Fraud could potentially be committed by staff, associates, learners, subcontractors, suppliers, contractors, other organisations or members of the public.

Our intention as an organisation is to ensure that we maintain robust control mechanisms to both prevent and detect fraud and theft. All staff and associates have a responsibility to protect the assets of the organisation and should be alert to the potential for fraud and theft.

Scope

All staff and associates have a responsibility for reporting practices which they think may be fraudulent. The primary responsibility for preventing fraud and theft lies with senior managers who have put in place policies, procedures and training to protect the organisation.

Ginger Nut training has a Fraud Prevention Lead who oversees:

- Our approach to the identification of risks
- The drafting and implementation of policies and procedures to prevent fraud
- The development of a culture which complies with our policies and procedures
- The promotion of fraud awareness and the training of staff and associates
- The investigation of any issues which need further examination

Senior leaders have also put in place a Governance Board including external members and an Audit & Risk Committee, which also has external representation. The Fraud Prevention Lead is responsible for reporting to the Audit & Risk Committee which will provide guidance on the role and expectations of the Fraud Prevention Lead. The Audit & Risk Committee and the Fraud Prevention Lead will seek to ensure that we implement legislation and respond proactively to any guidance issued by the DFE and other funders. The Fraud Prevention Lead is responsible for investigating any allegations and for ensuring appropriate action is taken. All matters which are deemed to require investigation will be reported to the Audit & Risk Committee, regardless of the nature of the allegation or the outcome of the investigation. Ginger Nut Training is also contractually required to notify the DFE immediately if it becomes aware of any instance of suspected fraud or financial irregularity.

All staff and associates have a responsibility to be aware of the potential for fraud and to take steps to minimise risks to the organisation (including theft). Staff should ensure that they are familiar with the

Whistleblowing Policy which is shared with all staff and associates at induction and is available on the company website.

Depending on the nature of the issue we will also report issues of potential theft or fraud to our insurers and to the police.

Definitions

- **Fraud:** The making of a false representation or failing to disclose relevant information, or the abuse of position, in order to make a financial gain or misappropriate assets (UK legal definition).
- **Error:** Unintentional mistakes or inaccuracies that may lead to financial losses or incorrect data.
- **Irregularity:** Deviations from established procedures or policies that may result in financial loss or reputational damage.
- **Bribery:** Offering or receiving improper benefits.
- **Corruption:** Abuse of power for personal gain.

Risk Assessment

Fraud is one or more of the following:

- False representation. "False" in this respect means the representation must be untrue or misleading, and the person making it must know it is, or might be, untrue or misleading.
 - Failing to disclose information that one is under a legal duty to disclose.
 - Abuse of a position in which one is expected to safeguard, or not act against, the financial interests of another person. To commit this offence the person's conduct must be dishonest with the intention of making a gain or causing a loss to another.
- Theft means dishonestly appropriating property, including money or other assets.

Risk Identification and Assessment

Examples of fraud (and our mitigation of these risks):

- Associate staff claiming payment for hours they have not worked (invoices checked and signed off by the relevant senior or IQA);
- Staff claiming mileage for journeys they haven't made (all learner visits etc signed off in advance; expense claims must be supported by a route planner confirming the miles claimed for); Claiming to have qualifications in an application/interview that they do not have (we ask for copies of all qualifications / certificates candidates declare at the interview stage);
- Working for another organisation whilst claiming sick pay (all staff have to declare and get permission for any work outside GNT per the Conflict of Interest policy; we only pay the statutory sick pay so there is minimal benefit for an employee to work another job whilst on sick leave);

- Falsely ordering goods or services for personal benefit (all items approved in advance by seniors to confirm need);
- ILR Fraud: Knowingly submitting falsified/incorrect data returns to the DFE or other funders, resulting in the inaccurate/overstated funding claims (ILR submission goes through multiple levels of internal and external oversight to check that our data is accurate, including monthly reviews by an external consultant and periodic mock audits. See the ILR Processing and Controls document for more details).

For the purpose of this policy an act will be considered fraudulent if it involves the use of deception with the intention of obtaining an advantage, avoiding an obligation or causing loss to the organisation or another party.

The best protection against fraud and theft is through staff and associates adhering to the organisations procedures and not being inhibited to challenge matters which do not appear to be correct.

If a staff member or associate is at any time unsure of policy or procedures they should seek guidance and support from the Fraud Prevention Lead.

The emphasis at Ginger Nut Training is on the development of a culture that values ethical behaviour and financial probity and has a zero tolerance policy towards fraud and theft.

Procedure

The prevention and detection of fraud and theft is made possible by having strong internal controls constantly applied. Routine checks and monitoring by management to ensure that procedures are being followed are, therefore, essential especially in those areas where risk of fraud and theft is greatest.

The primary responsibility for the prevention and detection of fraud and theft lies with management through the implementation, documentation and operation of effective systems of internal control. Monitoring of compliance with controls by management will be reinforced by reviews conducted by internal staff and from time-to-time externally appointed funding and compliance specialists.

As an organisation we expect all suspicions about fraud and theft to be reported and investigated. Our Fraud Response Plan is attached to this policy and will be implemented when fraud is suspected or alleged.

The organisation will always attempt to recover any sums lost through fraud or theft using the civil and/or criminal law and relevant insurance policies.

Vulnerable areas

The following areas within Ginger Nut Training are potentially vulnerable to fraud and error:

- Financial Transactions: Billing, payments, and financial reporting.
- Data Management: Handling of sensitive information, including apprentice records.
- Procurement: Supplier selection, contract management, and payments.
- Cyber Fraud: e.g. business emails compromised, supplier payment redirection, credential theft
- AI-enabled fraud: such as fabricated evidence, AI-generated learner submissions presented as original work, or deepfake identity verification attempts
- Learner funding fraud: false eligibility declarations, manipulation of off-the-job evidence, fictitious learners, concealment of prior learning etc

Fraud and Error Indicators

- Unexplained discrepancies in financial records.
- Inconsistent data entries.
- Unauthorised access to systems.
- Unusual patterns in transactions.
- Prevention and Detection

Awareness and Training

- All employees, associates and governance members will complete annual fraud awareness training and receive periodic fraud alerts and updates.
- Employees will be educated on their responsibilities and the consequences of fraudulent behaviour.
- Internal training provided based on the DFE's Indicators of potential fraud in educational organisations.

Internal controls

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Ginger Nut Training shall maintain a Fraud Risk Register identifying fraud vulnerabilities, ownership of controls, risk ratings and mitigating actions. This register shall be reviewed at least annually by the Audit & Risk Committee.

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Specific checks for DFE compliance

- Learner eligibility checks & prior learning assessments: see *Initial Assessment and RPL Policy*
- Employment status verification: see *Employer Engagement Policy*
- Evidence of off-the-job training: see *Employer Engagement Policy*
- Data evidence retained for audit purposes: see *Data Retention & Destruction Policy*

Reporting mechanisms

- A confidential reporting channel available for employees and apprentices to report suspicions (whistleblowing@gingernuttraining.co.uk).
- Suspected fraud or error will be promptly investigated.
- Evidence will be collected, and interviews conducted.
- Investigations will be conducted impartially, and sanctions carried out where appropriate
- As stated above, Ginger Nut Training has a contractual obligation to [report any suspected fraud or irregularity to the DFE](#).

Sanctions

- Disciplinary procedures will be followed.
- Termination of employment or apprenticeship may occur.
- Legal action may be pursued.
- Internal System Testing
- Regular assessments of internal systems will evaluate their robustness against fraud and error.

- Vulnerabilities will be addressed promptly.

Policies and Procedures

Ginger Nut maintain and communicate relevant policies, including:

- Whistleblowing Policy: Encouraging reporting of concerns.
- Data Protection Policy: Safeguarding sensitive information.
- Error and Rectification Policy
- Fraud Risk Register identifying fraud vulnerabilities, ownership of controls, risk ratings and mitigating actions. This register shall be reviewed at least annually by the Audit & Risk Committee

Responsibilities

- Finance & Fraud Prevention Officer: Oversight of financial processes.
- Director: Ensuring compliance with data protection laws.
- Audit & Risk Committee: To govern and review policy and ensure that external audits are in place

Investigation procedure

Stage	Timescale
Initial assessment	Within 5 working days
Investigation decision	Within 10 working days
Audit & Risk notification	Immediate for significant cases
DfE notification	Immediate where required
Closure report	Within 30 working days where practical

Jim Thomas

Jim Thomas (Aug 14, 2026 11:16:02 GMT+1)

Dan Williams

Dan Williams (Aug 28, 2026 11:21:55 GMT+1)

Version	Date	Author	Changes Made

Counter Fraud & Error policy 2026

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