



Anti-Fraud, Bribery and Corruption Policy

Presented by: **Innovate Learning Centre CIC**

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1. Introduction

1.1 Background

Innovate Learning Centre CIC is committed to transparency and ethical education. We aim to foster an honest learning environment for students and staff.

1.2 Our Ethical Commitment

We uphold a zero-tolerance approach to fraud, bribery, and corruption in all areas of our educational delivery and administration.

2. Purpose

2.1 Why This Policy Exists

To define clear standards, responsibilities, and actions in the face of misconduct.

2.2 Who It Applies To

All staff, learners, contractors, visiting lecturers, and any third parties working with us.

3. Scope

3.1 Included Activities

Enrolment processes, funding applications, assessments, certifications, and partner conduct.

3.2 Associated Persons

This includes apprentices, subcontractors, agencies, and freelance trainers.

4. Definitions and Examples

4.1 Fraud

Submitting false learner records, misusing bursary funds, or altering official documents.

4.2 Bribery

Offering gifts or payment in exchange for grades, enrolment, or internal influence.

4.3 Corruption

Using internal authority to bypass policy for personal or external benefit.

5. Prevention Strategies

5.1 Internal Controls

We use dual sign-off for finances, secure systems for attendance, and independent verification.

5.2 Education and Training

Staff and students are regularly trained on conduct, whistleblowing, and safeguarding.

6. Reporting Concerns

6.1 Reporting Channels

Report directly to the Finance Director or use the Whistleblowing hotline/email anonymously.

6.2 Protection of Whistleblowers

All reports are confidential. We do not tolerate retaliation of any kind.

7. Investigations and Outcomes

7.1 Investigation Process

Led by senior management, supported by legal or external experts if required.

7.2 Disciplinary Measures

Can include expulsion, termination, referral to ESFA, police, or Serious Fraud Office.

8. Roles and Responsibilities

8.1 Directors and SMT

Oversee policy, provide leadership, and ensure compliance through regular audits.

8.2 Tutors and Admin Staff

Act with honesty, report concerns, and ensure learners understand this policy.

8.3 Learners

Avoid dishonest behaviour and seek guidance where uncertain about what is acceptable.

9. Legal Compliance

9.1 Relevant Laws

Bribery Act 2010, Fraud Act 2006, Companies Act, and ESFA audit compliance.

9.2 Regulatory Expectations

As a CIC, we report all serious incidents to Companies House and other bodies as needed.

10. Monitoring and Review

10.1 Annual Review

Policy is reviewed every January. Updates may be made to reflect new risks or legal changes.

10.2 Evidence-Based Improvement

Lessons from cases and audits are used to improve procedures and training.

11. Declaration

11.1 Final Statement

We commit to protecting public funds, our learners, and the integrity of our centre.

11.2 Acknowledgement

All employees, learners and contractors must read, understand, and act in line with this policy.