

Shopfitters and Interior Contractors Competency Scheme (SICCS)



Anti-Fraud Policy

1. Introduction

This document sets out the policy and procedures of SICCS scheme managed by the National Association of Interior Contractors (NAS) against fraud and other forms of dishonesty from anyone associated to the Scheme. This includes NAS employees, directors, and associates, external SICCS applicants, sector organisations and third-party agents.

Any NAS employees, directors, and associates, who commits fraud, theft, or any other dishonesty, or who becomes aware of it and does not report it, will be subject to appropriate disciplinary action under this and other wider company policies.

2. Statement of intent

The NAS will continually strive to ensure that all its financial and administrative processes in line with the management of SICCS are carried out and reported honestly, accurately, transparently, and accountably and that all decisions are taken objectively and free of personal interest. We operate a zero-tolerance policy and will not condone any behaviour that falls short of these principles.

All members of the NAS have a responsibility for putting these principles into practice and for reporting any breaches they discover within the operations of the SICCS Scheme to the SICCS Manager who in turn will raise all issues of significance to the CSCS Anti-Fraud Officer.

3. Definitions

Fraud: A deliberate intent to acquire money or goods dishonestly through the falsification of records or documents. The deliberate changing of financial agreements, declarations and statements, or other records by either an applicant, a member of the public, including someone who is acting on behalf of an applicant or pertaining to be an agent.

The attempt to deceive and attempted fraud is treated as seriously as accomplished fraud.

4. Culture

The NAS fosters a culture of honesty and integrity through its staff. Directors and staff are expected to lead by example in adhering to policies, procedures, and practices. Equally, members of the public, applicants, service users, external organisations and third-party agents are expected to act with integrity and without intent to commit fraud against the SICCS, which is administered by the NAS.

As part of this, the NAS provides clear routes by which concerns may be raised by Directors, staff, and trustees. Details of this can be found in the NAS Staff Handbook. Senior management will deal promptly, firmly, and fairly with suspicions and allegations of fraud or corrupt practices.

a) SICCS

Overall responsibility for managing the risk of fraud has been delegated to the SICCS Manager. The day-to-day responsibility has been delegated to this role to act on behalf of the NAS Leadership and Director.

The responsibilities include:

- Undertaking a regular review of the fraud risks associated with each of the key scheme objectives.
- Establishing an effective anti-fraud response plan, in proportion to the level of fraud risk identified.
- The design of an effective control environment to prevent fraud.
- Establishing appropriate mechanisms for:
 - reporting fraud risk issues
 - reporting significant incidents of fraud or attempted fraud to the Board of Director Directors and to the CSCS Fraud Officer.
- Consulting with the SICCS Scheme appointed Auditors.
- Making sure that all staff are aware of the SICCS Anti-Fraud Policy and know what their responsibilities are in relation to combating fraud.
- Ensuring that appropriate anti-fraud training is made available to Directors and staff as required.
- Ensuring that appropriate action is taken to minimise the risk of similar fraud occurring in future.

b) SICCS Operational Support Staff

Every member of staff is responsible for:

- Acting with propriety in the use of SICCS and the NAS resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers.
- Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty and leadership.
- Being alert to the possibility that unusual events or transactions could be indicators of fraud.
- Alerting their manager when they believe the opportunity for fraud exists e.g. because of poor procedures or lack of effective oversight.
- Reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events to the Scheme Manager, and
- Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

5. Review

This policy will be reviewed on an annual basis.

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