

## Anti- fraud.

Seadream is committed to high standards of financial probity and takes its duty to protect the CIC funds it holds seriously. This policy aims to protect Seadream finances, assets and reputation. Seadream maintains high ethical standards and openness, and, the core values of fairness, trust and value support this.

Dr Juliette Jackson and Dr Jeanette Sanders are available to receive concerns. All Seadream representatives are to be treated equally and fairly.

## Principles of anti-fraud.

Fraud is defined as the intentional disturbance of financial statements or other records by persons internal or external to Seadream Education CIC which is carried out to conceal the misappropriation of assets or otherwise for gain.

The prevention/ detection of fraud/corruption and the protection of Seadream funds are the responsibility of all Seadream representatives and are of paramount importance to the CIC.

The anti-fraud covered by this policy statement includes incidents where Seadreams assets, including money, are dishonestly obtained by someone not entitled to them, for example:

- Theft of cash or assets.
- Falsifying information or documentation.
- Dishonesty between individuals.
- The deliberate concealment of information required by Seadream, e.g. convictions or activities inconsistent with Seadreams duties and responsibilities.

Seadream is firmly committed to dealing with fraud and corruption and no distinction will be made for perpetrators. In addition, there will be no distinction made in investigation and action between cases that generate financial benefits and those that do not.

Seadream will ensure that any allegations received in any way, including anonymous letters or phone calls, will be taken seriously and investigated in an appropriate manner, subject to the requirements of the Human Rights Act 1998 and other statutory provisions.

Seadream will deal firmly with those who defraud the CIC, or who are corrupt, or where there has been financial malpractice.

Where fraud or corruption have occurred because of a breakdown in the CIC's systems or procedures, directors will ensure that appropriate improvements in the systems of control are implemented to prevent a recurrence.

Prosecution: Each case will be considered on its merits.

Disciplinary action: Theft, fraud, bribery and corruption are serious offences against Seadream and staff will face disciplinary action if there is evidence that they been involved in these activities.

Criminal proceeding may also be undertaken, depending on the circumstances of each individual case, but in a consistent manner.

#### Detection and investigation.

All Seadream representatives play an important role in identifying potential fraud or corruption. It is not the responsibility of any one group to investigate suspicion as this may undermine a case to be pursued.

Any suspected fraud can be reported to any of the three Seadream Directors: Dr Juliette Jackson, Dr Jeanette Sanders or Dr Michelle Kiernan. Any person who witnesses or discovers a criminal act has the right to refer concerns directly to the police.

Key to awareness and deterrence is a formal and comprehensive system of feedback to provide outcome information to the person who originally referred concerns. Whist confidentiality must be respected, every referral should be concluded, and the outcome communicated to the person making the original referral.