

# **Fraud and Corruption Control Plan**

**October 2023**

## 1 Introduction and purpose

Oxford Policy Management Group (OPM) is committed to effectively managing the threat of fraud and corruption throughout our operations. This plan is informed by the principles of best practice in fraud and corruption control.

We have a very low risk appetite to fraud and corruption and a zero-tolerance approach to confirmed cases of fraud and corruption. This is demonstrated by a set of principles and actions that we apply to prevent, detect, investigate, and respond to fraud, bribery, and corruption.

The purpose of this plan is to outline the strategies we have in place to respond to the risk of fraud and corruption. The plan is designed to provide an integrated response to the risks of fraud and corruption and complements our overarching risk management strategy.

## 2 Scope

The plan covers the work undertaken by and on behalf of OPM. The relevant policies which contribute to the plan must be adhered to by all those conducting work for and on behalf of OPM.

## 3 Key Strategies and Actions

OPM's strategy for managing the risk of fraud and corruption has five key components:

1. **Planning and resourcing:** adequate planning and resourcing of strategies, policies and manpower needed to aid fraud control.
2. **Prevention:** a robust risk assessment of our operating environment, conducted regularly, and development of tight systems and processes which allow us to prevent, detect, investigate, and respond to cases of non-compliance.
3. **Detection:** tight internal and external auditing procedures and management reporting.
4. **Investigation:** a well-defined escalation process and internal investigation procedure to confirm fraudulent activities.
5. **Response:** procedures designed to respond to incidents of fraud and improve internal controls to prevent fraudulent activities.

The table below outlines the details of OPM's risk management response within the key components outlined above. Each activity is reviewed periodically and has a dedicated Responsible Officer who leads the activity and associated outcomes of the review.

The Responsible Officer named in the table below represents the senior manager responsible for the relevant activity at the corporate level. Where an activity is also implemented at the project level, the Project Manager is the Responsible Officer. The Project Manager is responsible for compliance and escalation with the relevant member of the Senior Management Team ("**SMT**").

	Activity	Specific Actions	Responsible Officer	Timeframe
1	Planning and Resourcing			
1.1	Fraud and Corruption plan	Review the plan as required.  Allocate an appropriate level of resources to controlling fraud and corruption risk.	CFO	Once every two years
1.2	Fraud and Corruption controls	Apply resources to test the effectiveness of fraud risk controls, as laid out in this Plan.	CFO	[Linked to Internal Audit roll-out]
1.3	Anti-fraud, Bribery and Corruption Policy	Review the Policy as required.	Head of Legal	Once every two years
1.4	OPM Issues, Concerns Reporting and Management Policy	Review the Policy as required.	Head of Legal	Once every two years
2	Prevention			
2.1	Publication of the Anti-fraud, Bribery and Corruption Policy	Make policy available to all suppliers and ensure all suppliers have agreed to read and accepted the policy as mandatory requirement prior to any engagement with OPM.  Ensure that any updates to the Policy are published to OPM's website and available to staff through SharePoint within 5 working days of authorization.	Head of Legal	At time of contracting   Ongoing
2.2	Anti-fraud, Bribery, and Corruption Training	Ensure all staff receive training during induction to OPM, and on a regular basis thereafter.  Review and update training provided to staff.  Ensure that adequate training is a contractual requirement for suppliers.	Head of Legal	Every two years  Annually  Ongoing
2.3	Risk Management Framework	Review the framework as required and ensure continual senior management commitment to controlling the risks of fraud and corruption in the overarching corporate strategy.	SMT	Every two years
2.4	Senior commitment	Ensure continual senior management commitment to controlling the risks of fraud and corruption in the overarching corporate strategy.	SMT, approved by FARCC annually	Annual

	Activity	Specific Actions	Responsible Officer	Timeframe
2.5	Risk Registers	Maintain and review risk registers to ensure all associated risks are captured, treated appropriately and monitored.	Corporate Risk Register: SMT  Project Risk Registers: PM	Quarterly  Quarterly
2.6	Fraud and corruption risk assessment	Consider fraud and corruption risks as part of annual business area operational planning process or with significant business changes.  Develop fraud and corruption treatments in response to risk assessments.  Review strategic risk profile and risk register.	SMT / CFO	Annual  Ongoing  Quarterly
2.7	Governance principles	Senior management to apply governance principles to all governance committees and forums throughout OPM.  Review the principles as required.	SMT	Ongoing
2.8	Conflict of Interest Policy and procedure	Review and update conflict of interest policy.  Make policy available to all suppliers and ensure they have agreed to read and accepted the policy as mandatory requirement prior to any engagement with OPM.  Ensure that any updates to the Policy are published to OPM's website and available to staff through SharePoint within 5 working days of authorization.  Remind staff of COI policy  Request COI declaration of SMT and Board	Head of Legal	Every two years  Upon contracting  Ongoing  Annually Annually
2.9	Conflict of Interest register	Maintain a process for reporting and managing conflicts of interests through a register  Review the register and mitigating actions regularly.	Head of Legal	Projects: Quarterly Corporate: Annual
2.10	Employment screening	Implement robust screening procedures for employees	HR Director	Ongoing
2.11	Due Diligence	Maintain a robust due diligence process for individuals and organisations before engagement  Review the procedure as required.	Head of Legal	Every two years Ongoing

	Activity	Specific Actions	Responsible Officer	Timeframe
2.12	Financial Management	Maintain internal controls across the organisation. Review internal controls	CFO	Ongoing [Linked to Internal Audit roll-out]
2.13	Procurement function	Ensure adequate procurement mechanisms and procedures.	COO	Ongoing
2.14	Managerial standards and accountability	Implement policies to ensure candidates for management roles are vetted for a skill-set appropriate for the role.	HR	Ongoing
2.15	Communication and awareness	Raise awareness of fraud and corruption to staff and suppliers. Review training material for staff.  Develop and deliver financial management training as required.  Make fraud and corruption information available to clients and the community as appropriate.	Head of Legal  CFO  Head of Legal/ CFO	Ongoing
3.	Detection			
3.1	Ethical culture	Maintain a Code of Conduct Policy. Assess culture through staff survey and Staff Consultative Committee.	HR	Ongoing Annual
3.2	OPM Issues / Concerns Reporting and Management Policy	Review bribery and corruption concerns as required	Head of Legal	Ongoing
3.3	External audit reports	Review reporting and recommendations from external auditors. Review the need to implement changes to controls as suggested.	CFO	Ongoing
3.4	Project audits	Review reporting and recommendations from project auditors.  Review the need to implement changes to controls as suggested.	CFO	Ongoing
3.5	Internal audit	Develop internal audit function to review fraud and corruption controls.	CFO / COO / FARCC	Ongoing
3.6	Independent whistleblower hotline	Maintain independent whistleblower hotline available globally to staff and other stakeholders	Head of Legal	Ongoing
4.	Investigation			
4.1	Investigations	Investigate incidents as detected from section 5 promptly and in line with Issues Concerns Reporting and Management Policy	Head of Legal (with support from Finance & HR)	Ongoing

	Activity	Specific Actions	Responsible Officer	Timeframe
4.2	Investigation Reports	Ensure comprehensive reports completed for all investigations undertaken, including recommendations.	Investigating Officer	Ongoing
4.3	Investigation Recommendations	Recommendations relating to fraud controls implemented	CFO	Ongoing
5	Response			
5.1	Internal reporting and escalation	As required in the Anti-Fraud Bribery and Corruption Policy, collate information in the incident register.	Head of Legal	Ongoing
5.2	Disciplinary proceedings	Apply appropriate disciplinary proceedings in line with OPM's Disciplinary Policy	HR	Ongoing
5.3	Recovery of losses	Case by case basis.	CFO	Ongoing
5.4	Review of internal controls	Review of internal controls following detection of a fraud or corruption incident and/or as outlined in detection measures in section 4	SMT/ CFO	Ongoing