

## People Elements of Fraud Management

### Recruitment

Recruit Ethical Leaders.

Perform effective pre-employment screening checks.

A Pay and Reward Strategy that rewards ethical behaviours.

Conflicts of Interest Declarations.

### Induction

Raise awareness of:

- Fraud risks;
- Compliance Rules
- Key Controls
- Whistleblowing policy
- Business Principles
- Gifts and Hospitality
- Conflicts of Interest
- Code of Conduct

### Competency Assessment

Knowledge checks for key roles.

Introduce a 'licence to operate safely'.

### Continual Development

Annually

- re-refresh induction messages for all staff;
- Require controls attestations from senior managers.
- Require Conflicts of Interest Declarations from Senior Managers

Re-induction when moving roles internally.

### Performance Management

Pay and Reward Strategy to reward ethical behaviour. Assess 'how' as well as 'what' has been achieved.

Prompt disciplinary action against staff who have breached policies, controls, or compliance rules.