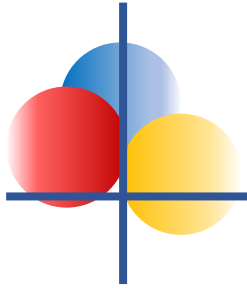


Anti-bribery and Fraud

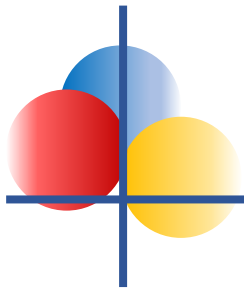




Objectives

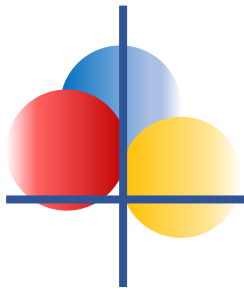
By the end of this training you will be:

- ✓ Aware of bribery
- ✓ Aware of corruption
- ✓ Aware of social housing fraud
- ✓ Understand how to prevent fraud



The importance of training!

- **Basic training** on anti-bribery should be given to all employees and board members, most likely as part of wider training on the Association's code of conduct. In addition anti-bribery training should be given to those in high-risk functions.
- **Training** should provide an understanding of what constitutes bribery, while also providing information in relation to improper practices and likely risk areas.



The importance of training!

- **It should** aid recognition of how bribery demands take place and set out how to respond. The training should ultimately support the development of skills to avoid or resist demands or solicitation for bribery.
- **Employees** should then be **assessed** at the culmination of the training (for example, by a multiple choice questionnaire) so that they can demonstrate their **understanding**.

Forensic Accountant



A Day at the Races



Race 1

Choose a race course



1. Ayr

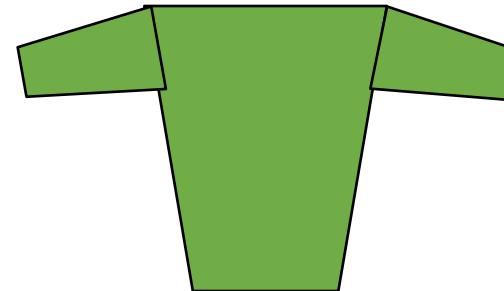
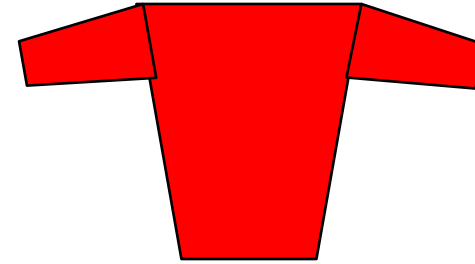
2. Chester

3. Newmarket

4. Kempton

Race 2

Pick a lucky Jockey shirt



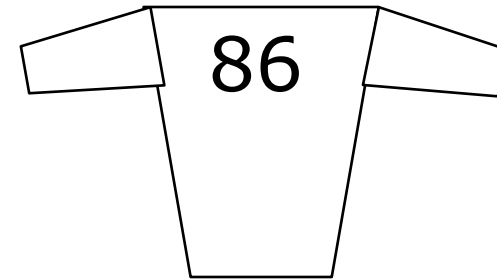
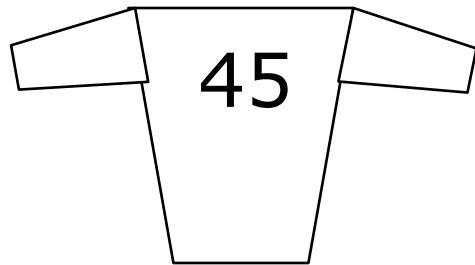
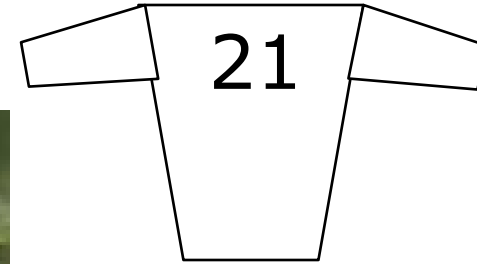
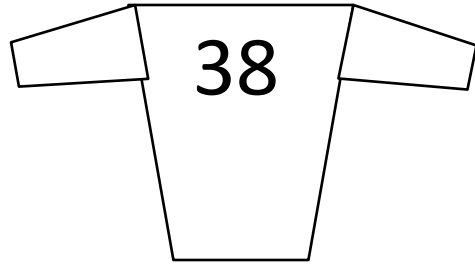
Race 3

Pick a winning horse

1. Last Rites
2. Pick Me
3. Make Money
4. Lost Soul
5. Second Choice
6. Hard Times

Race 4

Pick a lucky shirt number



Race 5
Choose a stall



1



2

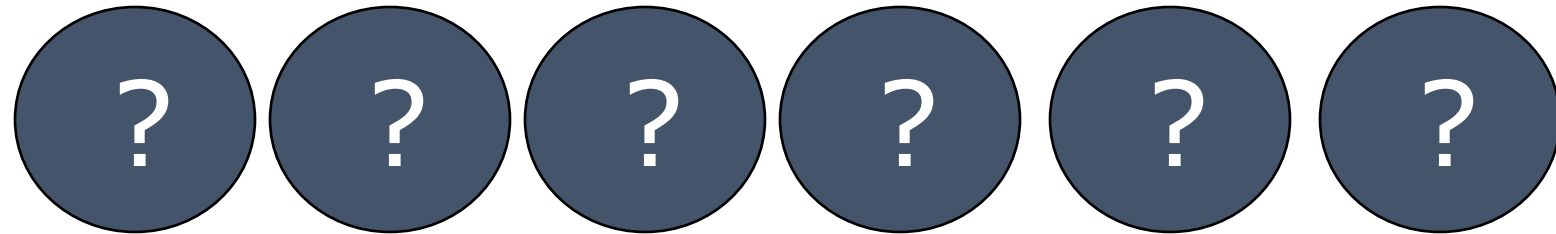


3

Race 6

Free lottery ticket

- Pick your six numbers



Race 7

Write down the following:

- Colour
- Flower
- Number
- Item of Furniture

Race 1

Choose a race course



1. Ayr

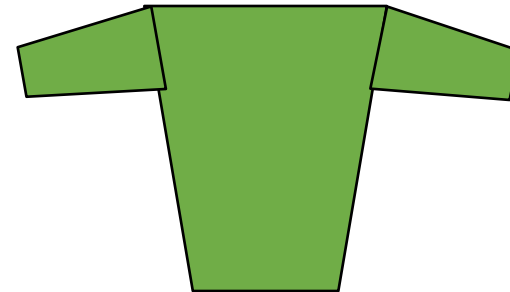
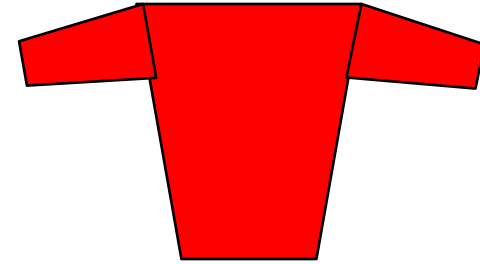
2. Chester

3. Newmarket

4. Kempton

Race 2

Pick a lucky Jockey shirt



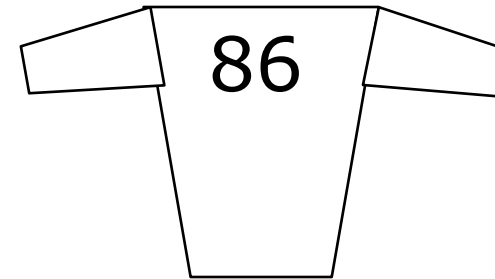
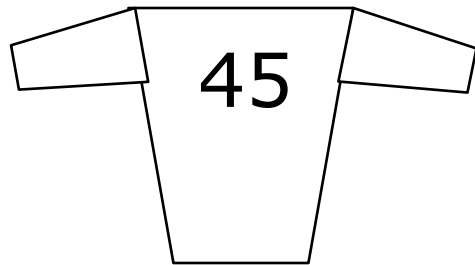
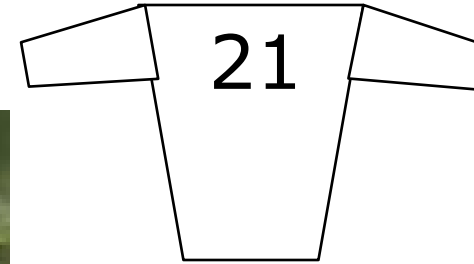
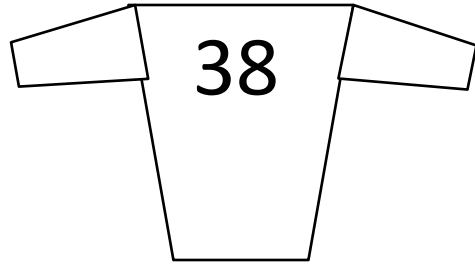
Race 3

Pick a winning horse

1. Last Rites
2. Pick Me
3. Make Money
4. Lost Soul
5. Second Choice
6. Hard Times

Race 4

Pick a lucky shirt number



Race 5
Choose a stall



1



2



3

Race 6

Free lottery ticket

- Pick your six numbers



1

7

8

9

21

49

Race 7

Write down the following:

- Colour
- Flower
- Number
- Item of Furniture

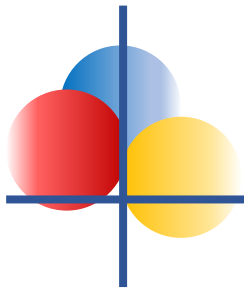
Race 7

Write down the following:

- Red
- Rose
- 7
- Chair

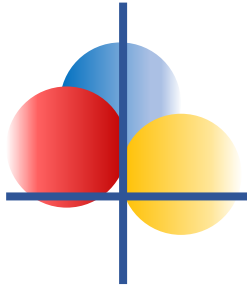
People are Predictable





The Bribery Act 2010

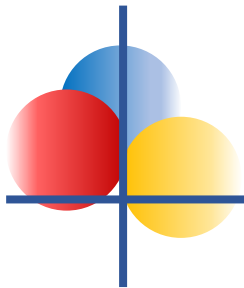
- The main areas of liability under the Bribery Act 2010;
- The responsibilities of employees, Board members and associated persons acting for us or on our behalf; and
- The consequences of any breaches of this policy.



DEFINE BRIBERY?

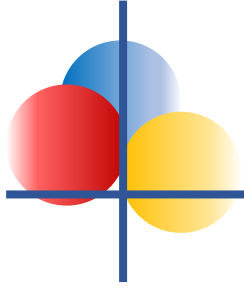
The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust.





A criminal offence will be committed under the Bribery Act 2010 if:

- An employee, Board member or associated person offers, promises, gives, requests, receives or agrees to receive bribes;
- Having adequate procedures in place to prevent bribery by your employees, Board members or associated persons would not necessarily provide a defence.

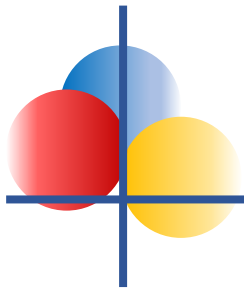


What form of inducements are usually given as a bribe?

Inducements can take the form of money, gifts, loans, fees, rewards or other advantages (services, donations, favours etc.).

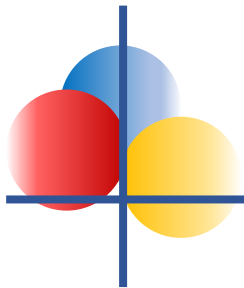
When a person offers, promises or gives a bribe, it is called 'active bribery' and when a person requests, receives, or accepts a bribe, it is called 'passive bribery'.





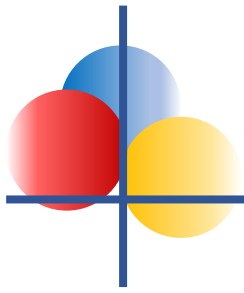
Examples of active bribery

- Contractors - Channelling bribes to the Procurement Manager to win contracts.
- Contractors - Employing a Housing Managers son to influence the award of contracts.
- Providing sponsorship fees and expenses to the Technical Team Away Day to influence them to favour a particular contractor.



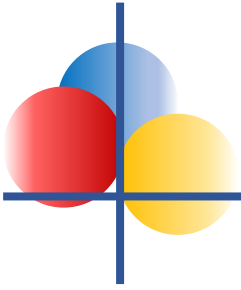
Examples of passive bribery

- A cleaner in a Housing Association accepts cash from criminals to allow access for theft.
- The Housing Manager receives a 'kickback' to award a contract.
- Recruitment: A senior manager asks for a cash sum to appoint or promote a person who would otherwise not have been selected.
- A senior manager awards a contract on the strength of promise of a lucrative job with the supplier after a suitable interval.



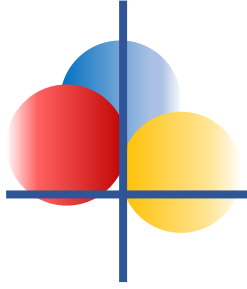
WHAT CONSTITUTES A BRIBE?

- A bribe is defined as a financial or other advantage given or received, with the intention of inducing or rewarding the improper performance of a relevant function or activity.
- A relevant function or activity is performed by or on behalf of a body of persons and the person performing the function or activity
- **is expected** to perform it in good faith
- **is expected** to perform it impartially
- **is in a position of trust** by virtue of performing it.



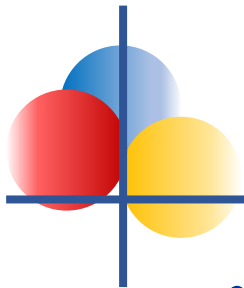
REGULATORY AND ENFORCEMENT BODIES

- The Crown Office and Procurator Fiscal Service (COPFS) prosecutes bribery offences in Scotland.
- Individuals face up to ten years' imprisonment and/or an unlimited fine on conviction.
- Associations can receive an unlimited fine.
- A director convicted of a bribery offence is likely to be disqualified from holding a position as a director for up to 15 years.



Conflicts of interest?

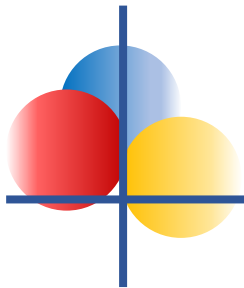
- Conflicts of interest arise when the various interests, duties or commitments that a person may have; family, friends, work, voluntary work or political interests, come into conflict (or are very likely to).
- They are common given the number of interests people inevitably have, and they do not necessarily involve improper or corrupt behaviour, although they can lead to such behaviour.



Risks from Conflicts of interest?

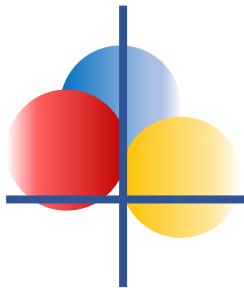
- A conflict of interest creates corruption risk when an employee or contracted third party breaches the duty due to the association by acting in regard to another interest and does not advise the association of this.
- This improper behaviour, if serious enough, could expose the person to extortion demands or be the first step to criminal behaviour including bribery.
- Even where there is no improper behaviour from a conflict of interest, the public perception might be otherwise.
- It is best practice for the association to be transparent about its policies and operations to avoid risk of public suspicion of conflicts of interest.

- Generally, weak identification and management of conflicts of interest will undermine the association's reputation for integrity.



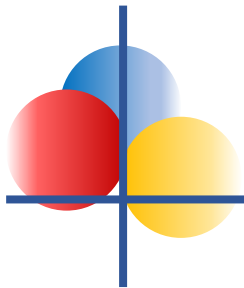
Mitigating the risk

- Staff and Board members sign Declaration of Interest form each year.
- Board members declare any personal interest in items on meeting agenda and leave for that discussion.



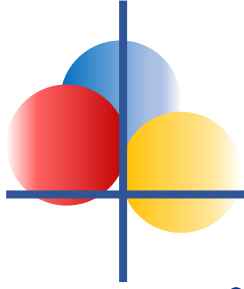
Gifts, Hospitality and Expenses

- Gifts, hospitality and expenses are vulnerable to being used for bribery. They can be used as bribes on their own but they also pave the way for bribery by entrapping a person.
- They can also be used to build or maintain relationships during a bribery scheme.
- So what exactly are classed as **Gifts, Hospitality** and **Expenses**?



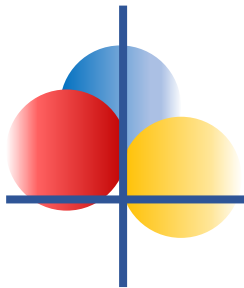
Gifts

- These are **money**, **vouchers**, **goods** or **services**, which, if given appropriately, are a mark of friendship or appreciation.
- They should be given without expectation of consideration or value in return.
- They may be given in appreciation of a favour done or a favour to be carried out in the future though care should be taken that this does not stray into being made with intent to achieve improper influence.
- Gifts should have no business roles other than marking and enhancing relations or promoting the giver's company by incorporating a logo or message on a promotional item.



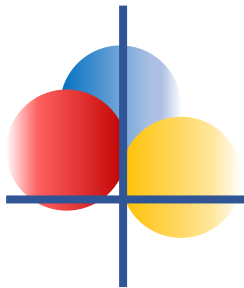
Hospitality or entertaining

- This is given or received to initiate, cement or develop relationships. It includes meals, receptions, tickets to entertainment, social or sports events.
- Hospitality requires the host to be present; if not, the expenditure is a gift.
- Often an argument for hospitality is made that it provides a relaxed, neutral, environment in which business relationships and activities can be started, fostered, information imparted and respect and trust shown.
- Hospitality can also be associated with fund-raising events held for charitable causes with the company assisting the causes by purchasing tickets or introducing potential supporters.



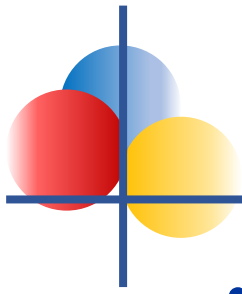
Expenses

- These are the provision or reimbursement by the company of travel, lodging and other expenses incurred by a prospective client, customer or business partner.
- Expenses can be a legitimate contribution to achieving a business outcome. For example, a company pays the travel and associated costs for representatives of a potential customer to visit a facility or attend an exhibition, event, conference or training.



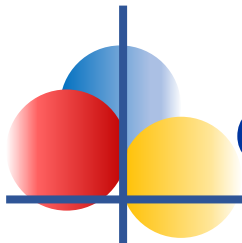
Mitigating the risks

- Entitlements, Payments and Benefits policy reviewed on a regular basis.
- Staff and Board members made aware of the Association's list of approved contractors and suppliers.
- Register of Gifts and Hospitality is kept up-to-date.



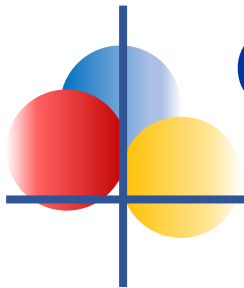
The Challenge of Knowing Where to Set the Line

- The challenge for associations in designing anti-bribery controls for promotional expenses is to know where to draw the line given the widely varying circumstances in which the transactions can take place.
- Is a different level of expense suitable when dealing with a director or when operating in a country where gifts are an important aspect of business relationships?
- Misuse of promotional expenses and violation of a no-bribes policy may not always be a deliberate act but can occur through negligence, inexperience or ignorance.



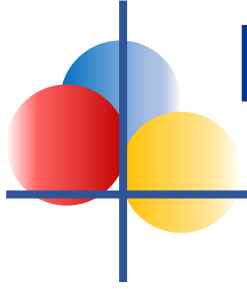
Tests to decide if gifts, hospitality or expenses are appropriate?

- **Bona fide:** Made for the right reason: if a gift or hospitality, it should be given clearly as an act of appreciation, if travel expenses then for a bona fide business purpose.
- **No obligation:** The activity will not create any obligation or expectation on the recipient.
- **No undue influence:** The expenditure will not be seen as intended for, or capable of, achieving undue influence in relation to a business transaction or public policy engagement.
- **Made openly:** It will not be performed in secret and be undocumented – if it is, then the purpose becomes questionable.



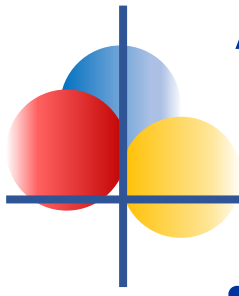
Cont...

- **Proportionate:** The value and nature of the expenditure is not disproportionate to the occasion.
- **Conforms to the recipient's rules:** The gift, hospitality or reimbursement of expenses will meet the rules or code of conduct of the recipient's organisation.
- **Infrequent:** The giving or receiving of gifts and hospitality is not overly frequent between the giver and the recipient.
- **Documented:** The expense will be fully documented including purpose, approvals given and value.
- **Reviewed:** The records of promotional expenses and the effectiveness of the policy and procedures are reviewed by management with a regular report to the board.



Finally - Gifts and Hospitality

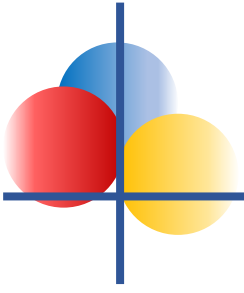
- The Association should operate to strict procedures governing the giving and receiving of corporate entertainment, gifts, hospitality and promotional expenditure.



Action to be taken on discovering bribery?

- **Any instances** of alleged or suspected bribery should be fully investigated. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out.
- **Disciplinary procedures** should be invoked where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. Similarly, Board members could face appropriate sanctions including removal from the Board.
- **The contracts** of any associated persons, including consultants or other workers who act for, or on your behalf and who are found to have breached this policy may be terminated.

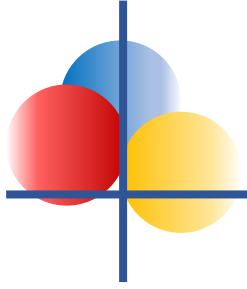




What is the meaning of corruption?

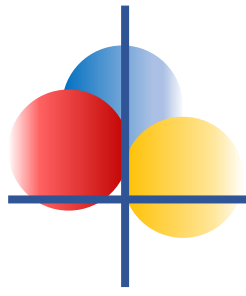
- Corruption is **dishonest behaviour** by those in positions of power, such as **directors, managers** or **office officials**.
- Corruption can include giving or accepting **bribes** or inappropriate **gifts**, double-dealing, under-the-table transactions, manipulating voting, diverting funds, laundering money, and defrauding tenants.





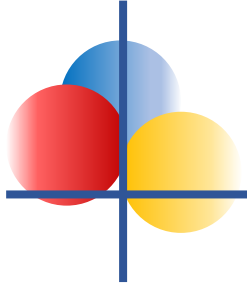
What causes corruption?

- Opportunities for **personal** or **professional** gain.



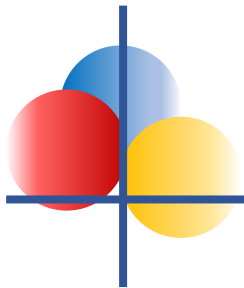
What types of corruption are Associations susceptible to?

- Forms of corruption vary, but can include bribery, extortion, nepotism and embezzlement.



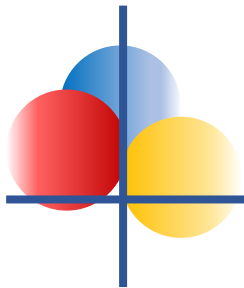
How can you detect corruption?

- Audits
- Self Reporting
- Citizen Reporting
- Journalism and Media Reporting
- Whistle Blowing



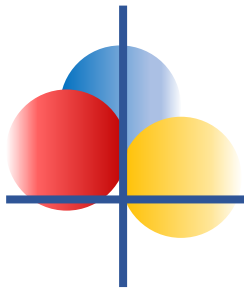
Audits

- An important method used to detect corruption in both **public** and **private** sector organizations is the auditing process.
- A simple definition of an **audit** is "a formal investigation of an organization's or individual's accounts or financial situation" as well as "a methodical examination and review".
- Audits can be **internal**, meaning that they are conducted by the organization itself, or **external**, which means they are conducted by another outside independent entity.



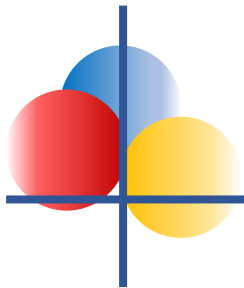
Self Reporting

- Another mechanism of detecting corruption is self-reporting. Some Countries have laws and incentives that encourage individuals to report on corruption in which they played a role.
- This process, known as self-reporting, is often associated with private sector entities, but is applicable to corruption in any organisation.



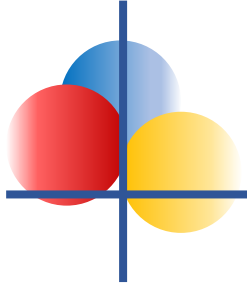
Citizen Reporting

- Members of the public are often the first ones to witness or experience corruption, particularly in the area of **public services**.
- To help expose **corruption**, members of the public can be instrumental in reporting on corruption through standard crime-reporting such as the police.



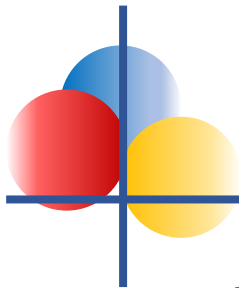
Journalism and Media Reporting

- Journalism and the media play a key role in reporting, exposing and curbing **corruption**.
- Reporting on corruption is "making a valuable contribution to the betterment of society" and investigative journalism in particular "holds the potential to function as the eyes and ears of tenants."



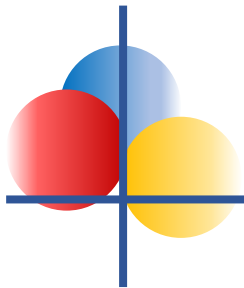
Whistleblowing

- Given that corruption can benefit the individuals directly involved, and there is a variety of means to cover up corruption within Associations, some corruption cases can only be detected if someone on the **inside** reports it.
- This kind of reporting activity is frequently called "whistle-blowing", because the reporting person sends out an **alert** about the activity, in the hope that it will be halted by the authorities.



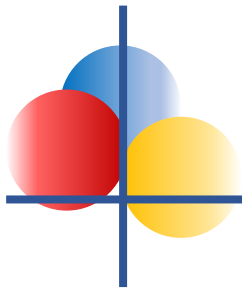
Tackling fraud in the social housing sector

- Housing associations fulfil a vital role in providing affordable homes to people with a low income.
- Unfortunately there will always be a minority of people who seek to defraud housing associations by obtaining properties dishonestly or by exploiting business, employment or online processes.
- Housing associations that fall victim to fraud need to consider not only the direct financial loss.
- There may also be an impact on their reputation, on taxpayers' confidence, and most importantly on the end-users of social housing – the tenants and residents – who can be the most vulnerable members of our society.



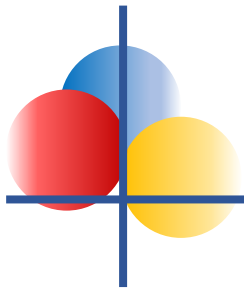
What is your role in dealing with fraud?

- As a director, chief executive, senior manager or committee member you have a responsibility to safeguard the assets of your association by having appropriate, robust and prudent risk and control frameworks in place.
- That is why it is so important to understand what fraud is and how it is dealt with by the law, and to have a clear plan to prevent, detect and respond to it.



Why are Housing Associations attractive targets for fraudsters ?

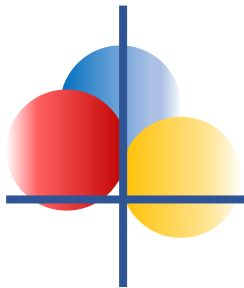
- **Increasing** property prices and a shortage of housing mean that more people than ever before are struggling to meet their housing and private rental costs, creating a lucrative market for people who are willing to exploit the sector for their own gain.
- **A lack of specialist** anti-fraud knowledge and skills within housing associations, particularly smaller ones, can easily allow fraud to go unnoticed.
- **There is often little incentive** to look for fraud, especially low-level fraud, when rents are being paid on time and no complaints are being received



WHAT IS FRAUD?

- Fraud can be broadly defined as the deliberate use of deception or dishonesty to disadvantage or cause loss (usually financial) to another person or party.

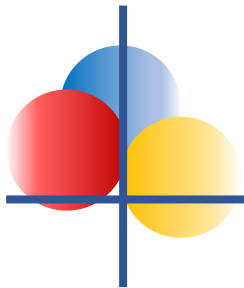




WHO COMMITS FRAUD?

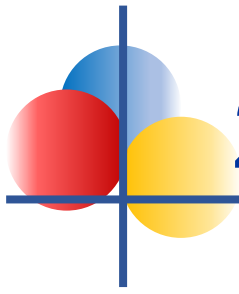
- Someone from within the organisation such as a staff member or volunteer (this is called employee fraud, internal fraud or insider fraud);
- Someone from outside the organisation such as a customer or service user, supplier, contractor or professional criminal (this is called external fraud); or
- A combination of an internal person and an external person working together (this is called collusion).





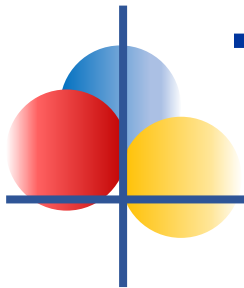
Fraud Act 2006

- Under criminal law, fraud is mainly dealt with under the Fraud Act 2006.
- Fraud can be committed by any intentional false representation, failure to disclose information or abuse of position that is carried out to make a gain, cause a loss or expose another to the risk of loss.
- Convictions can result in a fine, imprisonment or both.



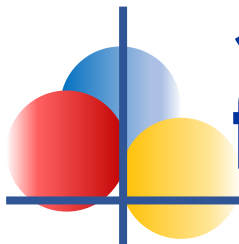
Prevention of Social Housing Fraud Act 2013

- Tenancy fraudsters can also be prosecuted by local councils on behalf of housing associations under the Prevention of Social Housing Fraud Act 2013 (PoSHFA 2013).
- Convictions can result in a fine, imprisonment or both. The courts also have the power to make the tenant pay back any profits made from the fraud.
- Remedies are also available under the civil law to recover money lost through fraud.



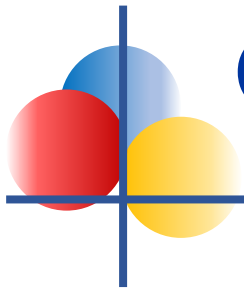
TENANCY FRAUD

- Tenancy fraud (also called social housing fraud) occurs when a housing association or council home is occupied by someone who is either not legally entitled to be there or has obtained use of the property fraudulently.
- Tenancy fraud causes significant social harm and can lead to antisocial behaviour. It deprives legitimate and deserving tenants access to affordable homes and has a direct impact on local people, their families and their communities.



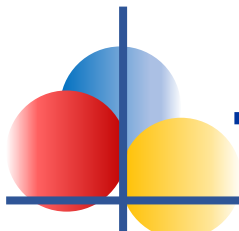
Some common types of tenancy fraud?

- **Application fraud** (also called allocation fraud): A prospective tenant either knowingly provides false information on their housing application in order to gain a property or applies for multiple properties in different locations and through different landlords.
 - **Key-selling fraud:** A tenant or an employee of a housing association receives a one-off payment to give the keys of a property to someone who is not entitled to live there.
 - **Subletting fraud:** A tenant rents out all or part of their property on a short- or longterm basis to someone else for private rental rates without the knowledge or permission of the landlord.
 - **Succession fraud:** A person moves into a property when the tenant either dies or moves away, and that person does not have the right to move in.
- 



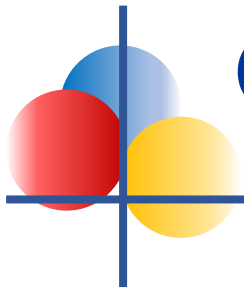
CORPORATE FRAUD

- Whenever an organisation acquires goods or services from another party, when it employs people or looks to outsource an internal function, there is a risk of fraud.



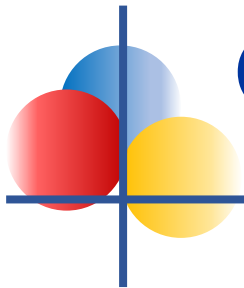
Examples of corporate fraud affecting the social housing sector are?

- **Employee fraud:** A staff member temporarily changes the payment details of a legitimate supplier or submits false invoices so that payments are diverted to their personal bank account (or that of a friend or relative) instead of the legitimate bank account of the supplier. An employee may also set up fictitious (or ghost) employees or submit false or inflated expense claims for travel or subsistence.
- **Supplier fraud:** A supplier submits false, inflated or duplicate invoices, or supplies substandard or defective goods to the association. A group of suppliers may work together to manipulate the tendering process to their advantage (eg, to claim greater than permitted rates on a framework agreement which governs the terms of the contract between the association and the supplier).



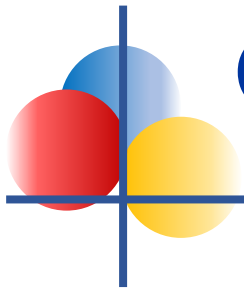
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- **Mandate fraud:** A third party impersonates a legitimate supplier and asks the finance team to change the supplier's bank account details to divert future payments. This may be coupled with sophisticated techniques to trick staff into disclosing information that can be used to make the fraud more convincing.
- **Bribery and collusion:** A staff member colludes with a third-party contractor or supplier to receive a financial kickback or other benefit. For example, an employee may receive a share of the profit on a contract in return for assisting the supplier to be awarded the contract.



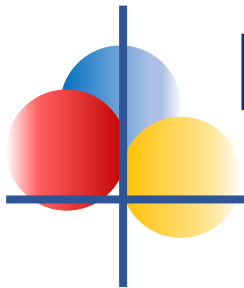
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- **Online crime:** This is an increasing threat to associations and includes phishing and malicious software (called malware) designed to damage or disrupt computer systems or steal business information.
- For example, a finance team may receive a legitimate looking email purportedly from the chief executive (but in reality a fraudster) asking for an immediate payment to be made to a 'contractor' for an amount unlikely to raise suspicion, or for confidential business information to be emailed to them.



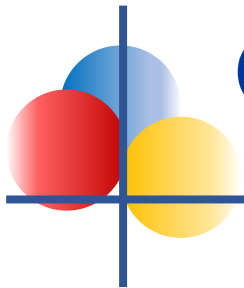
Cost of fraud?

- Research suggests that once the costs of dealing with the fraud are taken into account, the true cost of insider fraud can be much higher than the initial amount lost to the fraudster.
- These costs may include regulatory penalties, disciplinary processes, investigation costs and recruitment of replacement staff etc.



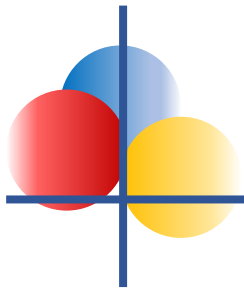
How can you prevent fraud?

- **Social housing** fraud deprives people who are genuinely in need of affordable housing, including older people and the vulnerable. With demand for affordable homes currently outstripping supply, it is important to protect housing stock and (where applicable) the taxpayers' investment from fraud.
- **Prevention** is always better than cure. It can be a very difficult and expensive process to end a housing association tenancy or to take action against a tenant, employee, supplier or other person. So stopping fraud in the first place can be much more cost effective in the long term.



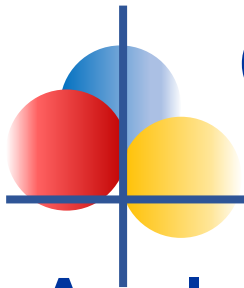
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- **The impact of fraud** can extend well beyond the direct financial loss. It can negatively affect staff morale, the organisation's reputation, and its ability to maintain existing homes and build new ones.
- **Good fraud prevention** can boost the confidence that your tenants, funders, staff, auditors, regulators and other stakeholders have in your organisation and its ability to protect income and assets.



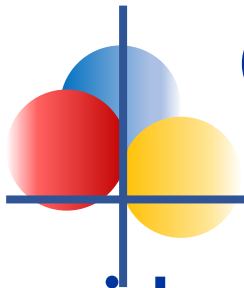
FRAUD PREVENTION CHECKLIST?

- **Introduce** and maintain policies on fraud, bribery, corruption and whistleblowing as well as a code of conduct or ethics. Ensure organisation-wide awareness of these.
- **Include fraud risks** on your risk register and review these regularly (eg, six-monthly or annually).
- **Put in place** appropriate internal financial controls for income, purchases, payments, property and investments to reduce the risk of loss through fraud, theft and error. Monitor compliance with the controls and carry out regular reviews.



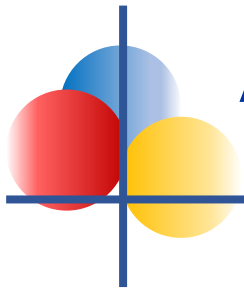
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- **Analyse** your housing management and financial systems to spot any common red flags of potential fraud that may warrant further examination.
- **Conduct due diligence** on tenants and business partners at the beginning of your relationship with them and then periodically throughout it. Checks can be made with credit reference agencies, local authorities and/or through shared fraud databases. For more information, read the Fraud Advisory Panel's guide on third-party due diligence.
- **Have staff vetting procedures** in place and carry out all relevant checks before an employee is appointed. Periodic checks may be appropriate for staff in high-risk areas (such as finance) or when they are promoted.



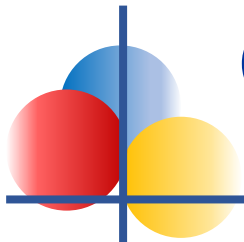
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- **Provide** mechanisms (such as dedicated phone lines or web pages) for concerned staff, neighbours, suppliers and other stakeholders to report suspicions or concerns about fraud. Promote these widely using a variety of methods and explain clearly how to access them.
- **Keep up to date** on the latest fraud threats affecting the business community in general and the social housing sector in particular. Remain vigilant for signs that they might be occurring within your organisation. Make sure relevant people are told about these risks and are trained to identify and deal with them.
- **Share best practice** and lessons learnt with other housing associations and local councils. Consider joining relevant sector networks to facilitate this.



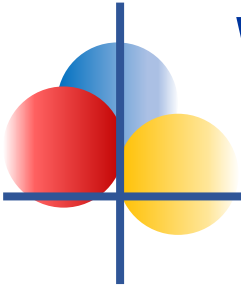
Additional steps to prevent tenancy fraud

- **Have a dedicated** tenancy fraud policy that covers subletting, application, succession, key-selling, right-to-buy and right-to-acquire fraud. Clearly communicate it to staff, tenants and any delivery partners.
- **Conduct checks** on new applicants as part of the application process such as identity, residency status, and tenancy history, etc. All new tenants should complete a housing application form and sign the relevant declarations, regardless of how they are obtaining the tenancy – be it through assignment, council nomination, mutual exchange or succession.



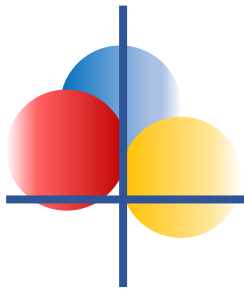
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- **Get colour photographs** of new tenants and/ or their signatures (to help to establish identity) as part of the allocation process, and review them during the tenancy audit process.
- **Conduct tenancy audits** on either an annual, risk-based or rolling basis to check that the authorised tenant is living at the property. Combine this with other planned visits (where appropriate) such as an annual gas safety check or a property valuation.
- **Train frontline staff** to spot fake and forged documents and the warning signs that indicate fraud may be taking place throughout the tenancy lifecycle.



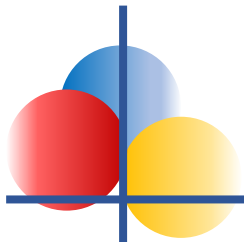
WHAT DO YOU DO IF YOU DISCOVER A FRAUD?

- **The discovery** of fraud can cause shock, disbelief and uncertainty throughout an organisation. It is important to know what to do when a fraud is suspected or uncovered so that action can be taken in an appropriate, effective and timely manner.
- **Procedures** are usually set out in the fraud response plan which explains how and by whom a fraud will be investigated, reported and dealt with.



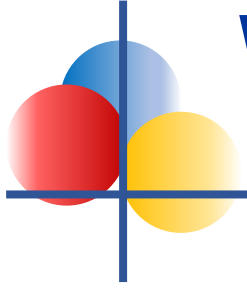
Reporting fraud to The Scottish Housing Regulator

- **All cases** should be notified to the Scottish Housing Regulator in accordance with the current regulatory guidance regarding Notifiable events.
- **In practical terms** this is where the value of the fraud, corruption or bribery or attempted fraud, corruption or bribery exceeds £1,000 or where it involves a Board member or Member of the Corporate Management Team (irrespective of value).



REPORTING FRAUD TO EXTERNAL AGENCIES

- Reporting fraud to relevant external agencies, such as police and other key stakeholders, is important and can help to demonstrate that your housing association takes fraud seriously.
- When making a report you should be prepared to tell them:
- **The type of fraud** and the amount involved
- **Who committed** the fraud and how
- **How it was discovered** (eg, internal controls, whistleblowing, bank, auditors)
- **What agencies** have been notified
- **The actions taken** to deal with the fraud and to prevent a recurrence
- **The actions taken** to deal with the fraudster and to recover any losses
- **Whether** the loss is covered by insurance.



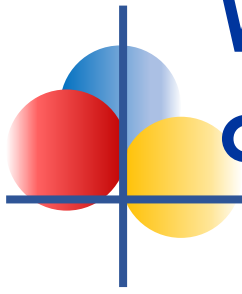
What year is the Bribery Act?

A 2006

B 2008

C 2010

D 2020



When a person offers, promises or gives a bribe, it is called ?

A

Passive Bribery

B

Assertive Bribery

C

Active Bribery

D

Practical Bribery



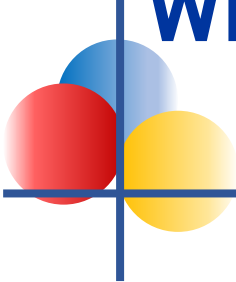
Individuals face up to years' imprisonment and/or an unlimited fine on conviction of taking bribes.

A 5 years

B 7 years

C 15 years

D 10 years



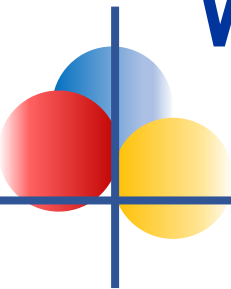
Which of the following do not constitute Gifts?

A Money

B Goods

C Services

D Compliments



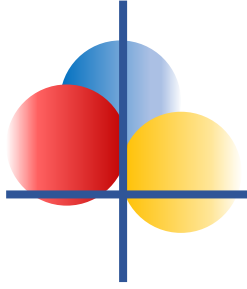
What causes corruption?

A Watching box sets
on TV

B Opportunities for
personal or
professional gain.

C Opportunities to
impress the boss

D Listening to Radio 2



How can you detect corruption?

A

Recording Calls

B

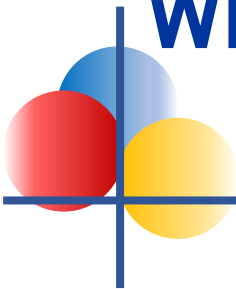
Having brightly
coloured staff uniforms

C

Audits

D

Browsing the internet
at lunchtime



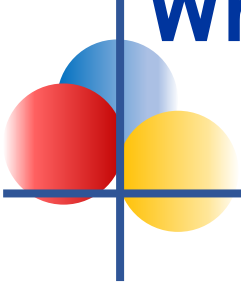
What is a common type of tenancy fraud?

A Betting on fixed odds

B Toilet roll hoarding

C Graffiti

D Key selling



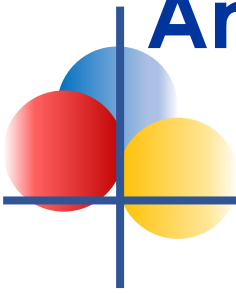
Which is a step to prevent tenancy fraud?

A Checks

B Stripes

C Paisley Patterns

D Pastels



Another step to prevent tenancy fraud is?

A Have Colin and Justin do a reality TV show about your Association

B Keep your ear to the desk

C Keep Taking the Big Pills

D Share Best Practice



Two part exam

- Written
- Multiple choice

And finally

Four Smart Students



The Test

- 1) Your Name? _____ (1 Point)
- 2) Which tyre burst? _____ (99 Points)
- Options a) Front Left b) Front Right c) Back Left
d) Back Right

Life is like

