



Anti-Fraud Policy

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| Document title: | Anti-Fraud Policy |
| Audience: | All employees of the College and its Subsidiary Companies, student body, Governors |
| Version: | 11.4 |
| Approved by: | Corporation |
| Date approved: | 21 st October 2021 |
| Date of next review: | June 2022 |
| Document owner: | VP Finance & Procurement |
| Equality and Impact Assessment: | Yes |
| Student Friendly Version | No |

Revision history

| Version | Type (new, replacement, revision) | Date | History (reason for changes) |
|---------|-----------------------------------|---------------|---------------------------------------------------------------------------------------------------------------------------------|
| V11 | Revision | February 2017 | Updated to bring into line with statutory Requirements. |
| V11.1 | Revision | January 2019 | Reviewed to ensure in line with statutory requirements – no changes; changes to job titles. |
| V11.2 | Revision | April 2020 | Reviewed to ensure in line with statutory requirements – links to external authorities have been updated along with job titles. |
| V11.3 | Revision | March 2021 | Separate Policy and Procedures |
| V11.4 | Revision | June 2021 | Annual Review |

Monitoring and review

This policy will be reviewed by SLT, the Audit Committee and the Corporation every year.

Purpose of the Policy

The purpose of the policy is to ensure that fraud is reduced to an absolute minimum. The aim of the policy and procedure is to protect the property and finances of the College.

The College will:

- Introduce appropriate measures to minimise the risk of fraud;
 - adopt formal procedures to investigate suspected fraud;
 - provide appropriate mechanisms for employees to voice their genuine concerns and protect those who do so;
 - deter employees from making malicious or unfounded accusations;
 - have no hesitation referring cases of suspected financial irregularity to the attention of the police;
 - work closely with the police and other appropriate external agencies to combat fraud;
 - support national and local initiatives against fraud.
- Follow legal guidance on fraud as defined by the Fraud Act 2006:
 - Fraud: any person who dishonestly makes a false representation to make gain.
 - Fraud by false representation.
 - Fraud by failing to disclose information.
 - Fraud by abuse of position.
 - Have a rigorous audit process which monitors compliance with regulations and undertakes a rolling programme of checks to detect, deter and prevent fraud and corruption.
 - Ensure Individuals must not communicate with any member of the press, media or another third party about a suspected fraud as this may seriously damage the investigation and any subsequent actions to be taken.
 - Require suspected irregularities to be referred to the Deputy Chief Executive. All reported irregularities will be thoroughly investigated. Please refer to procedures for the outlined process.
 - Encourage employees to report any concerns, without fear of being penalised. Normally, employees should raise such concerns with their line managers, who have a responsibility to investigate and keep their Directors fully informed. Other routes are available and employees are free to discuss the matter with any of the following:

Head of Business Area
Director of People Services
Director of Finance and Procurement
Chief Executive Officer

Linked policies

Anti-Bribery Policy
Gifts and Hospitality Policy
Procurement Policy
Business Expenses Travel and Subsistence policy
Financial Regulations
Whistleblowing policy and procedures
Rules relating to the Conduct of Staff
Declaration of Interests

Linked procedures

Anti-Fraud procedures