Anti-Fraud, Bribery and Corruption Policy

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Author:	Director of Governance Quality and Student Success
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Responsible Committee:	Executive Leadership Team
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External reference points:	OfS Condition E7; Bribery Act 2010; Fraud Act 2006
Linked policies:	GA 3.2 Risk Management Framework; GA 3.4 Conflicts of Interest Policy; GA 3.6 Whistleblowing Policy
Audience:	Staff

1. Purpose

This policy sets out the College's approach to preventing, detecting and responding to fraud, bribery, corruption and the inappropriate use of public funds. It supports lawful, ethical and transparent conduct and safeguards the integrity of academic, financial and operational decision making.

The policy is designed to support compliance with UK legal requirements, including the Bribery Act 2010 and the Fraud Act 2006, and with Office for Students Initial Condition of Registration E8 relating to fraud and inappropriate use of public funds.

2. Scope

This policy applies to:

- All employees of the College
- Members of the governing body and its committees
- Students and applicants to study
- Individuals or organisations acting on behalf of the College, including consultants, agents, contractors, partners and subsidiaries

The policy applies regardless of location, delivery model or contractual status, including provision delivered through partnership or sub contractual arrangements.

3. Definitions

3.1 Fraud

Fraud is the intentional use of deception, false representation, concealment, or abuse of position for financial or personal gain, or to cause loss to another party, including conduct defined under the Fraud Act 2006.

3.2 Bribery

Bribery is the offering, giving, requesting or receiving of a financial or other advantage to induce or reward improper performance of a function or activity, as defined by the Bribery Act 2010.

3.3 Corruption

Corruption is the misuse of entrusted power or position for personal, professional or third-party gain.

3.4 Relevant public funds

Relevant public funds include any funding obtained directly or indirectly from a public authority, including but not limited to funding administered by the Student Loans Company, the Office for Students, UK Research and Innovation, or funding received through partnership arrangements.

4. Policy Statement

The College adopts a zero-tolerance approach to fraud, bribery and corruption. Such conduct is unacceptable and will not be permitted in any circumstances.

The College expects all individuals within scope to act honestly and with integrity, to avoid improper influence, to declare conflicts of interest, and to raise concerns promptly where wrongdoing is suspected.

5. Roles and Responsibilities

5.1 Governing Body

The governing body holds ultimate responsibility for oversight of fraud, bribery and corruption risks and for ensuring that comprehensive and effective arrangements are in place to protect public funds.

5.2 Executive Leadership Team

The Executive Leadership Team is responsible for implementing this policy, ensuring that appropriate controls, resources and reporting arrangements are in place, and responding to significant incidents or breaches.

5.3 Policy Owner

The Director of Governance, Quality and Student Success is responsible for maintaining this policy, providing advice on its application, and overseeing reporting and assurance arrangements.

5.4 Individuals within Scope

All individuals covered by this policy are responsible for:

- Complying with its requirements
- Reporting suspected or actual fraud, bribery or corruption
- Cooperating with investigations where required

6. Comprehensive arrangements and internal controls

In accordance with OfS Condition E8, the College maintains comprehensive arrangements that could reasonably be considered adequate and effective to detect, prevent and stop fraud, bribery, corruption and the inappropriate use of relevant public funds.

These arrangements include:

- This Anti-Fraud, Bribery and Corruption Policy
- The Conflicts of Interest Policy, including declaration and management of gifts and Hospitality
- Internal control processes relating to financial management, procurement and data accuracy
- Controls to ensure the validity and completeness of data submitted to external bodies for funding purposes
- A risk register identifying fraud and public funds risks, with defined mitigations and ownership
- A Whistleblowing Policy enabling confidential reporting and protection from retaliation
- Staff training to support awareness, detection and prevention of fraud
- Deployment of staff with responsibility for overseeing these arrangements and appropriate governance oversight

These arrangements must operate coherently and without contradiction.

7. Risk management and mitigations

Risks relating to fraud and inappropriate use of public funds will be recorded and actively managed through the College risk register.

Mitigations may include:

- Enhanced controls over student recruitment, registration and enrolment
- Oversight of recruitment agents and third-party representatives
- Monitoring of partnership and sub contractual delivery arrangements
- Transparent tendering and procurement procedures with clear audit trails
- Segregation of duties and delegated authority limits
- Governance oversight of high risk financial and operational activities

8. Reporting and whistleblowing

Anyone who suspects fraud, bribery, corruption or inappropriate use of public funds must report their concerns promptly.

Reports may be made through:

- Line management routes
- The Governance Office
- The College Whistleblowing Policy, where concerns require confidential escalation

The College will not permit victimisation or retaliation against individuals who raise genuine concerns in good faith.

9. Investigation and action

Suspected or actual fraud, bribery or corruption will be investigated proportionately and fairly.

Action may include:

- Internal investigation
- Disciplinary action in accordance with relevant procedures
- Termination of contracts or agreements

- Referral to external authorities where required by law

All action will follow due process and be based on evidence.

10. Data integrity and public funds assurance

The College will maintain controls to confirm the accuracy, completeness and validity of data submitted for purposes related to receiving or accessing relevant public funds.

Inaccurate or incomplete submissions may constitute inappropriate use of public funds under OfS Condition E8.

11. Gifts, hospitality and conflicts of interest

Gifts, hospitality or other benefits that could reasonably be interpreted as inducements must be declared, recorded and managed in accordance with the Conflicts of Interest Policy.

This policy does not duplicate gifts and hospitality procedures, which are set out in GA3.4 Conflicts of Interest Policy .

12. Training and awareness

The College will provide role appropriate training to ensure staff understand fraud, bribery and corruption risks and their responsibilities under this policy. Training will be reviewed periodically to ensure continued relevance.

13. Monitoring and review

Compliance with this policy will be monitored through governance oversight, risk management processes, and internal review.

This policy will be reviewed at least every two years, or earlier where required by legal, regulatory or operational change, in accordance with GA3.1.

14. What this means for you

If you work for, study at, or act on behalf of the College, you must:

- Act honestly and with integrity
- Not offer, accept or solicit bribes or inducements
- Declare conflicts of interest, gifts and hospitality
- Report concerns promptly where wrongdoing is suspected

If you are unsure whether a situation may constitute fraud, bribery or corruption, you should seek advice from the Governance Office or make a declaration.