



Finance Division

1. Overview and Purpose

1.1 This document sets out the University's policy concerning fraud and procedures for dealing with suspected cases of fraud. It includes instructions about what to do should any fraud related concerns arise. The policy is supported and endorsed by senior management and Council, the University's governing body.

1.2 methods of seeking redress when/where fraud has been perpetrated

2. Scope

2.1 The policy applies to all parties associated with the University in a paid or unpaid capacity including staff, students, contractors and other third

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All managers and budget holders, including Heads of School and Directors of Professional Services have a responsibility to ensure compliance with the University's approved systems of financial controls in their areas of financial responsibility. They should also advise and support staff or third parties who report any fairly based suspicions of fraud or corruption in their areas to them and to ensure that suspicions are properly reported through the appropriate University channels.

3.6 Members of staff and others connected with the University

The University Financial Regulations state that all members of staff of the University and others connected with the University have a responsibility for the security of the University's property, for avoiding loss, for being efficient in the use of resources and for ensuring value for money in the University's transactions. They must comply with the approved systems of financial controls and ensure that they have a full understanding of their responsibilities and seek training or guidance where required.

In the context of this policy this includes a responsibility for the prevention and detection of fraud and to report any fairly based suspicions of fraud or corruption through the appropriate channels.

3.7 Internal and External Auditors

In the context of this policy the role of internal and external audit includes the review of controls and systems and ensuring compliance with financial instructions. Both Internal and External Audit have a duty to pass on any suspicions of fraud, bribery or corruption to the relevant individuals in the University. In the fir

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As a direct consequence of this, the University is committed (i) to reducing fraud associated with any of its activities, operations and locations to the absolute practical minimum and (ii) to the robust investigation of any fraud issues that should arise.

The University's approach to countering fraud will be comprehensive, cost-effective and professional, using specialist expertise if, as and when required.

Any investigation of fraud will be conducted without regard to factors such as position, title or length of service.

Where any acts of fraud or corruption are proven, the University will make every endeavour to ensure that the perpetrator(s) are dealt with to the full extent of the law and University Disciplinary Procedure or contractual processes where a third party is involved) and will also take every step to recover any and all losses in full.

4.3 The University's expectations in relation to fraud

The University will not tolerate fraud or any form of dishonesty in its transactions, and expects the following standards of conduct and behaviour:

- x All its members (staff, managers, Council members and students) should behave in a fair and honest way in any dealings related to the institution. This applies equally to both internal conduct, and also externally in relation to our suppliers, partners and other business associates.
 - x All staff and managers to apply themselves diligently to their work and the execution of their duties. Specifically to have due regard the need to rigorously apply those internal controls, rules and regulations which are designed to prevent, deter and detect fraud.
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Guidance for staff, managers and others who have concerns regarding a potential fraud is included at Appendix 2 to this policy.

4.5 Investigation and reporting of fraud

The Fraud Response Plan at Appendix 1 to this policy sets out the process that will be followed to investigate the suspicion and the circumstances in which notifications will be made to Audit Committee and Council, the Internal and External Auditors and the Office for Students

4.6 Dissemination of this policy

It is essential that everyone associated with the University including staff, students, contractors and third parties- are aware of the risk of fraud, corruption, theft and other activities involving dishonesty, in all its forms , of their responsibilities and the consequences of fraudulent behaviour or actions.

This policy is published on the University website maintained by the General Counsel and is

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