



Fraud Policy

Purpose of Policy

This policy is to help prevent fraud and corruption and to develop an anti-fraud culture.

Overview

The University is committed to conducting its activities fairly, honestly and openly, in accordance with relevant legislation, and to the highest standards of integrity.

As a charity deriving a significant proportion of its income from public funds, benefactions and charitable organisations, the University is concerned to protect its operations and reputation and its funders, donors, staff and students from the detriment associated with fraud and other corrupt activity.

The University has no tolerance of fraud committed by staff, associated persons, contractors or students. It aims to reduce instances of fraud perpetrated against the University to the absolute practical minimum.

Relationship of Fraud policy to Human Resources (HR) Disciplinary Policy

In cases of suspected fraud, the Fraud Policy and Procedures must be considered before the HR disciplinary process is initiated.

Scope

This policy applies to all staff, associated persons, contractors or students of the University.

It is concerned with occupational fraud i.e. fraud committed by employees, students or contractors of the University of Edinburgh (the "University") in the course of their work.

The policy makes occasional reference to students, to cover eventualities where students may be involved.

Contact

Name	Role	Email
Lynne Ramsay	Financial Accountant	Finance.help@ed.ac.uk



Fraud Policy

Fraud Definition	<p>Any intentional false representation, including failure to declare information or abuse of position that is carried out to make gain, cause loss or expose another to the risk of loss.</p> <p>In the UK, the term fraud is used to describe many acts such as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion.</p>
Strategic approach	<p>The University's primary approach to fraud is on prevention. If fraud is suspected we will investigate professionally and thoroughly, impose sanctions when confirmed and seek redress. We will review and monitor our processes and procedures to ensure they are effective and efficient.</p>
Standards	<p>University staff must have, and be seen to have, the highest standards of honesty, propriety and integrity in the exercise of their duties.</p> <p>Staff must not defraud the University, other staff members, students, clients or contractors, in any way.</p> <p>Staff must:</p> <ul style="list-style-type: none">• act with propriety in the use of official resources and in the handling and use of public funds whether they are involved with cash or payment systems, receipts or dealing with contractors or suppliers;• report details of any suspected fraud, impropriety or other dishonest activity immediately to their line or responsible manager who will report to the Director of Finance. Guidance on how to report concerns can be found in the Whistleblowing Policy and Procedures which can be found here:<ul style="list-style-type: none">• https://www.edweb.ed.ac.uk/finance/for-staff/financial-regulations-policies-and-procedures/policies-and-procedures• assist in the investigation of any suspected fraud. <p>The University also expects the same standards of its contractors and students.</p>
Zero tolerance	<p>The University will not tolerate fraud, impropriety or dishonesty and will investigate all instances of suspected fraud, impropriety, or dishonest conduct by its staff or external organisations (contractor or client).</p>
Action	<p>The University will:</p> <ul style="list-style-type: none">• report, as appropriate, suspected fraudulent acts or activities to the criminal authorities;• dismiss staff where appropriate;• co-operate fully with any relevant investigating bodies;• always seek to recover funds lost through fraud;• report all frauds to Internal Audit;• publicise the outcomes of successful investigations.



Fraud Policy

Notification to police	<p>The decision to inform the police rests with the Director of Legal Services.</p> <p>Notifying the Police when fraud is suspected must be done by the Investigating Officer who must be suitably trained and experienced in undertaking fraud investigations.</p> <p>This is vital because when findings are referred to the Police the evidence needs to be of criminal evidence standard.</p> <p>Allegations of financial impropriety will usually be investigated by a qualified member of the Internal Audit team.</p>
Anti-Fraud Culture	<p>All staff should understand the risk of fraud faced by the University.</p> <p>Fraud is serious and diverts resources away from the University's primary objectives.</p> <p>As the aftermath of fraud is costly, time-consuming, disruptive and unpleasant, and may lead to unwelcome adverse publicity, a major thrust of this fraud policy is prevention.</p> <p>We will encourage staff, through training, on how to detect fraud and we will promote a culture where people feel enabled to challenge suspect acts and behaviour.</p>
Responsibility for Fraud Policy	<p>The responsibility for the Fraud Policy lies with the Director of Finance.</p> <p>The Annual Report from the Chief Internal Auditor should monitor the effectiveness of the policy.</p>
Communication of Policy	<p>It is essential that all staff are aware of the Fraud Policy and Procedures.</p> <p>Communication should come from various sources:</p> <ul style="list-style-type: none">• The Policy and Procedures will be on the Finance Website;• The Communications Department of the University must ensure that the information is disseminated in the most appropriate manner to reach all staff, students and external organisations.• Leaders and managers must ensure that their teams are aware of the policy and procedures.

28 September 2020



Fraud Policy

Document control

Author	Lynne Ramsay, Financial Accountant
Approver	Lee Hamill, Director of Finance
Signature of approver	
Date approved	28 September 2020
Section responsible for policy maintenance review	Counter Fraud Group

Change control record

Approval date	Amendment made	Approved by