

Anti-Fraud Policy

Version 1

04 March 2026

Contents

1. Introduction	Page 2
2. Definition	Page 3
3. Scope	Page 3
4. Anti-Fraud Policy Objectives	Page 3-4
5. Reasonable Fraud Prevention Procedures	Page 4-5
6. Monitoring and Review	Page 5
7. Fraud with Academic Implications	Page 5
8. Ownership and Oversight	Page 5-6

1. Introduction

- 1.1 The University is committed to conducting its activities fairly, honestly and openly, in accordance with relevant legislation, and to the highest standards of integrity. Further, the University believes that action against fraud is in the broader interests of society.
- 1.2 This policy is established to facilitate the development and maintenance of a culture which will aid the prevention and detection of fraud. It is essential that everyone associated with the University – including staff, contractors and third parties – is aware of the risk of fraud, corruption, theft and other activities involving dishonesty.
- 1.3 The University operates a zero-tolerance approach to fraud and will investigate all cases of suspected fraud committed by staff, students and third parties. Fraud by University employees or student members acting on behalf of the University will be treated as a serious disciplinary offence.

2. Definition

- 2.1 Fraud is a dishonest act or omission that is made with the intent of making a gain or causing a loss (or the risk of a loss). Under the UK's Fraud Act 2006 there are three specific offences:
 - i. fraud by false representation;
 - ii. fraud by failing to disclose information;
 - iii. fraud by abuse of position.
- 2.2 Corruption is dishonest or fraudulent conduct, typically involving bribery.
- 2.3 Bribery is the offering, promising, giving, requesting, or accepting of a financial or other advantage with the intention to induce or reward improper performance. (See the University's Anti-Bribery Policy.)
- 2.4 From 1 September 2025 a further offence of failure to prevent fraud came into effect, created by section 199 of the Economic Crime and Corporate Transparency Act 2023 (ECCTA 2023). This offence makes it possible for the University to be criminally liable where an employee, agent, subsidiary or other associated person commits a fraud intending to benefit the organisation and the organisation did not have reasonable fraud prevention procedures in place.
- 2.5 Fraud can often be associated with direct financial gain, but in the HE sector, academic fraud is also a possibility. This could include fraud related to immigration, admissions, internships, examinations and awards and could have potentially significant consequences for the University.

3. Scope

- 3.1 This policy applies to any fraud, or suspected fraud, including academic fraud, committed by or involving, staff, workers, volunteers or interns; other associated persons including agents and subsidiaries of the University and persons providing services for or on behalf of the University (including academic franchises); members of the University committees, panels or boards; researchers and academic visitors (whether self-funded or employed by other entities such as other funders or universities); agents, vendors, contractors, consultants, third party representatives and business partners, donors, sponsors, outside agencies doing business with the University and/or any other parties which have a business relationship with the University.

4. Anti-Fraud Policy Objectives

- 4.1 The key objectives of the University's anti-fraud policy are:
 - a) Maintain an **anti-fraud culture**.
 - b) Effective **deterrence** of fraud.

- c) Active **prevention** of any fraud that cannot be deterred.
 - d) Efficient **detection** of any fraud that cannot be deterred.
 - e) Professional **investigation** of any **detected** fraud.
 - f) Effective internal and external **actions and sanctions** against people found to be committing fraud, which may include legal action.
 - g) Effective **communication and learning** in relation to fraud.
 - h) Effective methods of **seeking redress** when/where fraud has been perpetrated.
- 4.2 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. Any such investigation will be conducted without regard to factors such as position, title or length of service.
- 4.3 Where any acts of fraud or corruption are proven, the University will make every endeavour to ensure that the perpetrator(s) are dealt with, and will also take every step to recover any losses in full.

5. Reasonable fraud prevention procedures

- 5.1 The University's procedures to prevent fraud will be informed by the principles set out in Home Office guidance for the offence of failure to prevent fraud.

5.1.1 Top-Level Commitment

The University is committed to preventing fraud. Responsibility rests with the Vice-Chancellor's Executive, Directors of Professional Services and Heads of Colleges and Schools to foster a culture within the organisation in which they communicate that fraud is never acceptable and where staff are empowered to speak up; the University will reject profit based on, or assisted by, fraud, will ensure clear governance in respect of fraud prevention and commit to training and resourcing.

5.1.2 Risk Assessment

The University will review risks at least annually, alongside the wider risk assessments undertaken by management within the various Professional Services, Colleges and Schools at operational level. This process will be overseen by the Director of Finance, Estates and Commercial Services and informed by processes such as audits, spot checks, sector specific information and regulatory enforcement.

5.1.3 Proportionate risk-based prevention procedures

The University will maintain a proportionate control framework to protect and support its goals through preventative and detective controls as set out in this policy, communications and training and planned monitoring and oversight activities to ensure that controls are operating effectively.

5.1.4 Due diligence processes and reviews

The University will ensure appropriate use of technology (third-party risk management tools) and conducts regular reviews of contracts.

5.1.5 Communication (including training)

The University will seek to ensure that its fraud prevention policy is understood throughout the organisation through internal communications and externally through contractual

requirements. The University's anti bribery training covers whistleblowing procedures and fraud specific training will be provided where necessary.

6. Monitoring and Review

- 6.1 The University will monitor and review its fraud prevention measures and their effectiveness through its reviews of procedures, contractual clauses or training completion on a regular basis as determined by the Vice-Chancellor's Executive.
- 6.2 The University's Whistleblowing policy sets out the importance of a free flow of information about serious shortcomings in any of its activities so that appropriate action may be taken. Where a member of staff might discover information which they believe shows wrongdoing or malpractice within the organisation, the policy ensures they are able to disclose the information without fear of reprisal.

7. Fraud with Academic Implications

- 7.1 Fraud can often be associated with direct financial gain, such as procurement and invoicing fraud. However, in the University/Higher Education sector, academic fraud is a further possibility, including fraud related to research, partnerships, immigration, admissions, internships, examinations, awards and payment of fees.
- 7.2 Such a fraud may involve a number of stakeholders, including the police and professional bodies, but decisions regarding their involvement – generally – remain the scope of senior University officers. To ensure that the investigation is not compromised, however, it is vital that the number of people aware of the investigation is kept to an absolute minimum. Notwithstanding, it should be recognized that some frauds of this nature will involve the police initiating their own investigation.
- 7.3 Perpetrators will be subject to disciplinary and/or legal action which could lead to staff being dismissed from employment and students being de-registered from the University.

8. Ownership and Oversight

Document name:	Anti-Fraud Policy
Version number:	V1.0
Equality Analysis:	N/A
First approved by:	Vice-Chancellor's Executive – 08/12/25 Finance, Estates and IT Committee – 02/03/26 Audit, Risk and Assurance Committee – 04/03/26

This version approved by:	Finance, Estates and IT Committee – 02/03/26 Audit, Risk and Assurance Committee – 04/03/26
Effective from:	04/03/26
Next review date:	January-March 2029
Senior Policy Owner:	Rachael Fleetwood, Director Finance, Estates and Commercial Services
Policy Author:	Rachael Fleetwood, Director Finance, Estates and Commercial Services Aman Hart, General Counsel
Overseeing committee:	Audit, Risk and Assurance Committee
Compliance measures:	Concerns about the policy or its implementation to be raised with the Director of Finance, Estates and Commercial Services in the first instance.
Related policies, procedures and codes of practice:	<ul style="list-style-type: none"> • Anti-Bribery Policy • Conflicts of Interest Policy • Gifts and Hospitality Policy • Research Governance Policy • Whistleblowing and Public Interest Disclosure Policy and Procedure • Student admissions policies and procedures • Staff recruitment policies and procedures • HR policies, including staff disciplinary procedures • Student disciplinary procedures
Related legislative and/or regulatory requirements	Economic Crime and Corporate Transparency Act 2023

9. Version History

Version	Date	Summary of changes	Author
V1.0	21/11/25	Establishment as a substantive policy.	Rachael Fleetwood, Director Finance, Estates and Commercial Services Aman Hart, General Counsel