

FRAUD AND CORRUPTION - ANTI-FRAUD AND ANTI-CORRUPTION POLICY

SUMMARY OF PRINCIPAL CHANGES

General changes	
UPR FR04 has been restructured with effect from 30 November 2015 to include the University's 'Anti-Fraud and Fraud Response Plan' and is now numbered UPR FR08 in the series.	
Section	
4.2	Refer to text

(Amendments to version 03.0, UPR FR04, are shown in italics.)

1 INTRODUCTION

- 1.1 As a Higher Education Corporation the University of Hertfordshire values its reputation and sets high standards to ensure that its assets are safeguarded. The prevention of fraud and corruption is fundamental to this.
- 1.2 The University's expectation of openness, honesty and accountability is that members of the Board of Governors, management and staff at all levels will lead by example in ensuring adherence to legal requirements, regulations, procedures and practices including the HEFCE document 2004/27: 'Accountability and Audit: HEFCE Code of Practice'.
- 1.3 The University expects that external stakeholders, including individuals and organisations (suppliers, contractors and service providers) with whom it comes into contact, act towards the University with openness, honesty and integrity.
- 1.4 This document (UPR FR08) was reinstated within the UPR series on 8 May 2012 and should be read in conjunction with UPR GV12¹.

2 RESPONSIBILITIES OF THE BOARD OF GOVERNORS

- 2.1 To review the effectiveness of internal control processes and procedures by receiving an annual report from the Audit Committee informed by the continuing work of the Head of Internal Audit.
- 2.2 To develop and maintain an anti-fraud and anti-corruption policy.
- 2.3 To ensure that appropriate processes are in place such that all suspected irregularities, financial or otherwise, are reported to the Audit Committee, the Vice-Chancellor or the Board of Governors and to the Head of Internal Audit and in accordance with the HEFCE Code of Practice, the Accounting Officer of HEFCE where the irregularity is of sufficient seriousness.

3 RESPONSIBILITIES OF THE VICE-CHANCELLOR AND CHIEF EXECUTIVE

- 3.1 To authorise the initiation of any necessary investigations and, in particular, to sign all necessary authorities for surveillance to be undertaken.
- 3.2 To initiate the University's disciplinary procedures where the findings of an audit investigation indicate dishonest behaviour.
- 3.3 To contact the Police where sufficient evidence exists that a criminal offence may have been committed.
- 3.4 To liaise with the Police and the Crown Prosecution Service concerning whether any prosecution will take place.

¹ UPR GV12 'Bribery and Corruption'

- 3.5 To maintain a Register of Interests which will include information concerning corporate hospitality (UPR GV12¹, refers).
- 3.6 The Vice-Chancellor may delegate these responsibilities to the Group Finance Director and the Secretary and Registrar under the provisions of UPR FR06².

4 RESPONSIBILITIES OF EMPLOYEES

- 4.1 To ensure that the assets of the University, its wholly-owned subsidiary companies and their wholly-owned subsidiaries are safeguarded.
- 4.2 To report suspected irregularities, financial or otherwise, to the Vice-Chancellor *and/or to the Secretary and Registrar, and to the Head of Internal Audit*. In the event that the suspected irregularity involves an Appointee of the Board³ or a member of the Board of Governors, the report should be made to the Chairman of the Audit Committee and to the Head of Internal Audit.
- 4.3 To make any declarations required under the terms of UPR FR06² and UPR GV12¹.

5 IMPLEMENTATION

This policy will be implemented through procedures which will be drawn up by the Secretary and Registrar.

Mrs S C Grant
Secretary and Registrar
Signed: 27 November 2015

² UPR FR06 'Corporate Governance and Financial Regulation'

³ The Appointees of the Board are the Vice-Chancellor, the Deputy Vice-Chancellors, the Group Finance Director and the Secretary and Registrar.