



Fraud Policy and Procedure

INDEX

1.	Forward
2.	Fraud Strategy
3.	Scope
4.	Purpose
5.	Roles and Responsibilities
6.	Definitions of fraud, corruption, bribery and theft Fraud
7.	Identifying and Managing Fraud
8.	Fraud Threats
9.	Deter, Pursue, Prevent & Detect (including Investigation process)
10.	Contractors Staff
11.	Third Parties
12.	Complaints
13.	Recovery of Losses
14.	Training
15.	Exceptions
16.	Amendments
17.	Information and Resources
18.	Key Contacts
19.	Contact
Appendices	
Appendix 1:	Fraud Response Plan Summary
Appendix 2:	Common Examples of Fraud

POLICY/PROCEDURE

1. Forward

The University of Wolverhampton has core values which are to act in a manner which is ethical, respectful, transparent, inclusive and fair, challenging, confident, collaborative and professional. The University will act honestly, ethically, transparently and within the law.

The University is committed to the proper use of the University's finances and all resources and endeavours to ensure transparent and accountable working practices for all in order to protect those finances and resources from misuse.

The University is also under a duty to account for the proper use of public funds and standards required in public life, in accordance with Lord Nolan's Seven Principles of Public Life which apply to anyone who holds public office, including those in the education sector.

We believe that the overwhelming majority of the University's employees, governors, students, contractors and suppliers are honest and have no thought to defraud the University. However, we recognise that a small minority will attempt to do just that. Any money lost in this way is money that we cannot spend delivering the critical education provision for our students and apprentices.

We are determined to keep up a strong guard against it through the approach set out in this document. We all have a part to play in stamping out fraud. As we deliver our objectives, we must recognise the importance of the controls set out in this document to protect us from fraud. We must all remain vigilant and recognise the many forms that fraud and corruption may take.

We must have the conviction to raise any concerns we come across and we must have the resolve to investigate those concerns promptly and to take tough action against proven fraudsters.

This document sets out a comprehensive approach to ensuring that fraud is reduced to an absolute minimum. Its success will depend on our co-operation to send out the robust message to potential fraudsters that they will be rooted out and dealt with.

David Reeve
Chief Financial Officer

Professor John Raftery
Vice Chancellor

Angela Spence
Chair of the Board of Governors

2. Fraud Strategy

The University of Wolverhampton, in common with all Higher Education providers, recognises the potentially significant risk that fraud and corruption pose to the achievement of the University's aims and objectives.

Put simply, any money lost to fraud and corruption is money that cannot be used for the delivery of essential, student services.

The University strives to achieve the highest standards of public service; therefore, it adopts a zero-tolerance stance against all forms of fraud, corruption, bribery and theft.

The University is committed to embracing best practice when fighting fraud and corruption, and the strategy that follows is designed to achieve this. The University will continually review and revise the strategy to ensure its resilience to fraud and corruption is maximised.

All employees of the University have an important role to play. You must comply with key University policies, procedures and standards of conduct, and remain vigilant to potential incidents. The University also encourages its contractors, partners and suppliers to raise concerns at the earliest opportunity.

The University is committed to investigating concerns thoroughly, promptly and, wherever possible, confidentially. Malicious or vexatious allegations will not be tolerated.

Wherever fraud or corruption is proven, the University will take all appropriate action against the perpetrator and will pursue all options available to recover any losses incurred.

Aims and objectives:

- To assess new and existing fraud threats.
- To create a strong counter-fraud and counter-corruption culture within the University.
- To maintain effective systems and procedures for the prevention and detection of fraudulent and corrupt activity.
- To establish an effective response to suspected cases of fraud and corruption, to ensure all suspicions are properly and thoroughly investigated.
- To take appropriate and strong action to deal with proven fraudsters.
- To vigorously pursue all forms of redress to recover financial losses.

3. Scope

As an exempt charity, the University of Wolverhampton must operate to ensure that its resources are protected so that it can fulfil its aims for the public benefit.

This policy applies to all persons working for the University; or on our behalf in any capacity, at all levels regardless of whether such persons have an employment contract with the University. This includes all staff,

governors, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

For the purposes of this policy, "University" refers to the University of Wolverhampton and any of its subsidiary companies.

This document sets out:

- The University's policy in relation to fraud,
- The key responsibilities in relation to prevention and detection of fraud,
- The procedures to be followed if an issue arises, and
- Key responsibilities in relation to any potential fraud that arises.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

This policy also applies to any other person associated with the University who performs services for and on behalf of the University anywhere in the world. This includes the University's partners, agents, brokers, subcontractors, representatives, distributors, consultants and other service providers. The University expects those persons to abide by this policy or have in place equivalent policies and procedures.

To help communicate our expectations of others, this policy may be made available to our commercial and other partner organisations and disseminated to others with whom we work. This means in many cases the policy should be discussed with any party whom the University is considering conducting business with, to ensure they understand the standards we must adhere to as an organisation.

Fraud may also be carried out by third parties outside the University community, in an attempt to deceive the University, its staff, students, or members of the public. The procedures set out in this document apply to fraud which may have been carried out by third parties whether it would affect the University or the University community or, members of the public, or an authorised regulatory body (for example, HMRC), such as, for example, using the University name to deceive members of the public.

All suspicions of financial impropriety arising from the activities of any of these groups fall within the scope of this strategy.

4. Purpose

The University is committed to ensuring that it has reasonable prevention procedures in place to prevent fraud by its employees and associated persons. It is important to ensure that sufficient reporting mechanisms are in place to ensure concerns can be raised and investigated.

This policy and procedures set out to ensure that:

- Reasonable prevention procedures are in place,

- Anyone who becomes aware of a fraud or suspected, or potential fraud raises it in the appropriate manner so that it can be properly investigated,
- Steps are taken to prevent further loss once a potential issue has been identified,
- Evidence is established and secured for investigation and, if appropriate, disciplinary or police action,
- Stakeholders are informed of potential fraud where appropriate and as soon as possible,
- Steps are taken, where appropriate, to recover any losses,
- Appropriate action is taken against those responsible for fraud or suspected fraud; and
- Any necessary changes are made to procedures and systems in the light of lessons learned.

University staff who fail to adhere to the terms of this policy may be subject to disciplinary action, up to and including dismissal, in addition to possible criminal charges.

5. Roles and Responsibilities

The University's Board of Governors has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under it. The Senior Leadership of the University has responsibility for implementing and upholding the principles of this policy, and creating an environment where staff feel empowered to make appropriate referrals. This policy has also been adopted by the University Executive Board as a key policy for the University, and the oversight of this policy is through the Audit and Risk Committee.

The Chief Financial Officer, in conjunction with the Board of Governors, should review this policy from a legal and operational perspective:

- At least every three years.
- Whenever there is a significant change in related legislation; or
- As a consequence of specific cases.

All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Information on reporting can be located in section 9 of this policy.

Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Chief Operating Officer via Transparency@wlv.ac.uk.

The Audit and Risk Committee has responsibility for advising the Board on the matters referred to above, including reviewing these policies.

Specifically, the Audit and Risk Committee has responsibility for reviewing the outcome of any investigation that is carried out under this policy and any recommendations for actions to be taken to prevent further fraud.

The Chief Operating Officer has responsibility for investigation of any matters referred to by the Chief Financial Officer.

Responsibility for the management and implementation of this policy and procedures lies with the Chief Financial Officer and, when requested, making recommendations for actions to be taken to prevent further fraud.

The Chief Financial Officer, Legal Services and Human Resources are able to provide advice on the implementation of this policy and procedures, as appropriate.

6. Definitions of Fraud, Corruption, Bribery and Theft Fraud

For the purposes of this policy and procedures, the term “fraud” is used to describe a range of activities. This policy applies to any activity that could be described as fraud, including criminal tax evasion and facilitation of criminal tax evasion.

“Fraud” is not a technical term, and a number of different criminal offences or civil actions may be relevant if there has been fraudulent behaviour. Manipulating, altering, or destroying computer records or programmes, and misusing IT resources is also fraud for the purposes of this policy.

Examples of fraudulent behaviour include:

- Theft,
- Deception,
- Breach of trust,
- Actions causing financial loss or leading to financial gain,
- Criminal tax evasion,
- Facilitation of criminal tax evasion,
- Misappropriation,
- False representation,
- Concealment,
- The manipulation of computer programmes or data including altering, substituting or destroying records, or creating spurious records; and
- Misuse of IT resources.

The Chartered Institute of Public Finance and Accountancy (CIPFA) defines fraud as ‘...the intentional distortion of financial statements or other records by persons internal or external to the organisation which is carried out to conceal the misappropriation of assets or otherwise for gain.’

The Fraud Act 2006 establishes that fraud may be committed in the following ways:

- a) Fraud by false representation.
- b) Fraud by failing to disclose information.
- c) Fraud by abuse of position.

Corruption

Corruption is defined as 'the offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person.'

Bribery

The Bribery Act 2010 establishes that an offence of bribery occurs when a person offers, gives or promises to give a financial or other advantage to another in exchange for improperly performing a relevant function or activity. Similarly, the offence of being bribed is defined as requesting, accepting or agreeing to accept such an advantage in exchange for improperly performing such a function or activity.

Theft

The Theft Act 1968 states that 'a person shall be guilty of theft if he dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it'.

7. Identifying and Managing Fraud

The Fraud Act 2006 places a focus on the dishonest behaviour of an individual and their intent to make a gain or cause a loss. The offence of fraud can be committed in three ways:

- **Fraud by false representation** – lying about something using any means, e.g., by words or actions.
- **Fraud by failing to disclose** – not saying something when you have a legal duty to do so; and
- **Fraud by abuse of a position of trust** – abusing a position where there is an expectation to safeguard the financial interests of another person or organisation fraud can take a number of forms such as:
 - Deception,
 - Forgery,
 - Bribery,
 - Extortion,
 - Conspiracy,
 - Collusion,
 - Embezzlement,
 - False representation,
 - Misappropriation,
 - False accounting.

Individuals may be prosecuted under the Fraud Act 2006 if they make false representation(s), fail to disclose information or abuse their position of trust.

The University encourages all of its community to come forward and report concerns. This is a core part of our commitment to ethical and legal compliance and the University is committed to ensuring that individuals making reports do not suffer detriment as a result. Any person, who is concerned about making a report through

the channels described in this document, should follow the procedure outlined in the Speak Up (Public Interest Disclosure) Policy (which can be located here [WLV Policies - University of Wolverhampton](#)).

Activities identified as fraud might constitute gross misconduct, and staff who are involved are likely to be subject to disciplinary action in accordance with the procedures laid out in the Disciplinary Policy.

Students who are involved in any activity that is considered to be fraud are likely to be subject to disciplinary action in accordance with the procedures laid out in the Student Code of Conduct and Disciplinary Procedure (which can be located here: [Regulations, Codes of Conduct and Bye Laws - University of Wolverhampton \(wlv.ac.uk\)](#)).

The University will also take the appropriate action against any third party involved in fraud that would affect the University community in any way. Where appropriate, this will involve reporting the matter to the police for formal investigation and prosecution or taking action against an individual or organisation.

Members of the University, contractors and their staff are expected to be vigilant in taking action to detect and prevent fraud and to report any concerns about fraud as set out in the procedures below.

8. Fraud Threats

An Annual Fraud Report shall be presented to the University Executive Board and the Audit and Risk Committee.

The Annual Fraud Report shall assess whether the level of resource invested in counter-fraud and counter-corruption activity is proportionate to the assessed level of risk facing the University.

An important element in the Annual Fraud Report is to consider the University's resilience to fraud and corruption. Resilience will be tested by a range of means:

- Internal Audit's scheduled reviews of key systems assessed as vulnerable to fraud and corruption.
- Evaluation of the University's counter-fraud arrangements against best practice guidance.
- Review of the adequacy and effectiveness of the University's Fraud Response Plan (further details can be located below).

9. Deter, Pursue, Prevent & Detect

Deter

The University's first line of defence is to deter would-be fraudsters from considering an attack against the University. The deterrence factor will be maximised through a range of measures:

- Prominent publication of the University's zero tolerance stance against fraud and the strategy for combating it,
- Design and implementation of a fraud awareness programme, to ensure the profile of fraud remains high among the University's community,
- Publication of the University's successes in identifying and taking strong action against fraudsters.

It will not be possible to deter all fraudsters, therefore the University must ensure it has strong preventative controls in place. Wherever appropriate and cost-effective to apply, the University will design and implement controls to prevent fraud. The University's Internal Audit reviews those areas of the University's activity deemed to be at greater risk to fraud and corruption, and it works with management to recommend suitable, preventative controls.

Despite its best efforts to deter and prevent fraud, attacks against the University will inevitably slip through.

A range of actions are taken to detect such cases:

- All staff are expected to comply consistently and routinely with internal controls designed to bring data anomalies and other indicators of fraud to the attention of management. As with the preventative controls, the University's Internal Audit reviews the adequacy of the University's fraud detection controls in key systems, and it makes recommendations for any weaknesses to be addressed.
- As part of its counter-fraud programme, Internal Audit carries out targeted, analytical reviews of key systems and services to identify indicators of fraudulent activity.
- The University's Speak Up (Public Interest Disclosure) Policy is prominently publicised to encourage everyone to raise any genuine suspicions they may have.
- The University's Anti-Money Laundering Policy and Procedures are kept under review to enable the reporting of any suspicions of money laundering activity.

All policies and information on procedures can be located here: [WLV Policies - University of Wolverhampton](#).

Changes and developments in the University's internal systems and procedures may adversely impact the established controls to counter fraud. The impact on the fraud risk in changes to or the introduction of new systems and procedures will be evaluated through timely liaison with the Internal Audit to discuss new and significantly changing systems and procedures.

Pursue

Where there are genuine grounds to suspect fraud or corruption, the University is committed to ensuring that all cases are investigated promptly, effectively and fully. In order to achieve this the University has developed a **Fraud Response Plan** and it is expected that this plan should be followed in all cases.

All matters involving suspected criminal activity will be referred to the Police at the earliest opportunity. The referral decision will be taken jointly by the Chief Financial Officer (or their nominated representative) and the Chief Operating Officer (or their nominated representative).

In support of the University's zero-tolerance stance, there shall be a general presumption that the University will request the Police to charge offenders in all cases of fraud, corruption, bribery and theft. The Chief Financial Officer and the Chief Operating Officer will consider each matter on a case-by-case basis.

Where the Police or Crown Prosecution Service decide not to charge offenders, the University will consider bringing a private prosecution. The Chief Financial Officer and the Chief Operating Officer will consider each prosecution on a case-by-case basis.

Where offenders are identified as employees of the University, the University's disciplinary procedure will be invoked in all cases.

The University will pursue all possible options to recover any losses incurred.

Prevent

Communication and Training

The strategy and the associated Fraud Response Plan will be widely publicised to ensure it is readily available. Prominent publication should also ensure that the strategy comes to the notice of potential fraudsters. The University's Communications Team will advise on the most suitable format, timing and media to be used.

The University will put in place a training plan to enhance our employees' ability to deliver this strategy. The specific content of the training plan will be subject to review as part of the Annual Fraud Report, but its key components are likely to include the following:

- Requirement for all staff to complete a periodic fraud awareness survey,
- Qualification training for staff responsible for the investigation of suspected fraud,
- Targeted training for key staff likely to be involved in the Fraud Response Plan.

Success measures

The Annual Fraud Report will include an evaluation of the success of this strategy in achieving its objectives. Success measures and indicators will include, but not be limited to, the following:

- Analysis of trends in the incidence of reported fraud prevention and detection.
- Completion of a fraud assessment to highlight internal and external threats with the greatest impact to the University.
- Take-up of University-wide fraud awareness training.
- Outcome of formal audits of compliance with key preventative and detective controls in areas of activity vulnerable to fraud.
- Timely responses to suspected cases identified.
- Effectiveness of actions taken against proven fraudsters.
- Recovery rate for any losses incurred.
- Updates on new initiatives to counteract the risk of fraud.

Detect

Fraud Response Plan (Discovery, Action, Investigation and Outcome)

The Counter Fraud Strategy makes it clear that the University has a zero-tolerance approach to fraud and corruption. Wherever there are genuine suspicions, staff are encouraged to raise their concerns at the earliest opportunity.

This Fraud Response Plan provides guidance to staff on the procedures that should be followed where a fraud is suspected or discovered. It should be read in conjunction with the Counter Fraud Strategy and the University's Speak Up (Public Interest Disclosure) Policy. A summary of this plan is attached as a flowchart at

Appendix 1.

All staff should be aware that, if an allegation is found to have been made maliciously or for personal gain, then disciplinary action may be taken against the person making the allegation.

Discovery

There are a number of ways in which a fraud may come to light:

- Discoveries by managers or employees, usually arising from standard controls being broken or from employee suspicions.
- Specific fraud detection exercises such as data matching or data analytics.
- A “tip-off” from a third party; either a member of staff or an external party.
- Routine systems audit checks or specific audit checks on high-risk areas.

The scope of suspected fraud might range from internal incidents (for example, employee claims for travelling expenses) to circumstances affecting third parties (for example, suppliers submitting duplicate invoices). A list of common examples of fraud is attached as **Appendix 2**.

Action to be Taken when Suspicion Arises

Employees

If you become aware of a suspected fraud you must report the matter to your line manager as quickly as possible. This must be done in a way that ensures confidentiality is maintained at all times as the initial suspicions may turn out to be unfounded or the perpetrator may be alerted to your suspicions.

If you feel unable to discuss your concerns with your line manager, for whatever reasons, you can instead raise your concerns with the Chief Financial Officer or the Chief Operating Officer.

You should not contact the Police regarding suspicions. The referral decision will be taken jointly by the Chief Financial Officer and the Chief Operating Officer.

You may choose to report your concerns anonymously or you may request anonymity. While total anonymity cannot be absolutely guaranteed, every endeavour will be made not to reveal the names of those who pass on information.

Managers

When told about a suspected fraud, as a line manager you should listen to the concerns raised and treat them seriously and sensitively.

You should gather as much information as possible from the staff member(s) and any notes or evidence that are readily available to support the allegation. These should be held securely to ensure evidence is not destroyed or lost. Under no circumstances should you attempt to investigate the matter yourself or covertly obtain further evidence as this may adversely affect any internal investigation or Police enquiry.

You should immediately contact the Chief Financial Officer or Chief Operating Officer to advise them of the situation.

Governor

Where there is suspicion that a governor may be involved in fraudulent activity, you should report the matter directly to the Chief Operating Officer. The Chief Operating Officer will determine whether the matter should be reported to the Chair of the Board of Governors.

If as a governor, you become aware of suspected fraud you should report the matter to the Chief Financial Officer or the Chief Operating Officer.

Referral to Police

All matters involving suspected criminal activity will be referred to the Police at the earliest opportunity. The referral decision will be taken jointly by the Chief Financial Officer and the Chief Operating Officer.

The decision to accept a case for investigation rests fully with the Police.

If it is determined that an internal investigation is needed before contacting the Police, the need for a referral should be reconsidered once the findings of the internal investigation have been reported (see below).

When referring an investigation to the Police the Chief Financial Officer / Chief Operating Officer should ensure the following conditions are met to improve the chances that the case will be accepted for investigation:

- It must be established that there are reasonable grounds to believe that a criminal offence has been committed.
- The points to prove the offence need to be identified and considered.
- The fraud needs to be more than an error or omission.
- The allegations should concern recent events and should not have become stale by reason of age. Incidents that are over two years old before discovery need to be judged individually on their merits, including the availability of documentary evidence and the reliability of witness statements.
- They must identify and preserve all original documents and other exhibits relating to the matter in accordance with the Police and Criminal Evidence Act 1984 (PACE), to assist subsequent Police referral.

The University must be prepared to supply all original documents and exhibits to the Police if an investigation is expected and commenced. Such evidential material should be securely retained before handover to the investigating officer. Any movement of original documentation and exhibits for safeguarding should be recorded for information to the investigating officer.

Internal Investigation

The Chief Operating Officer will review the concerns raised and any evidence that is initially available and will decide:

- If an investigation is required as concerns are valid,
- If no investigation is required as concerns are not indicative of fraudulent activity, but also considering theft, computer misuse, money laundering etc.
- If an initial inquiry is required to gather more evidence to support or refute the concerns.

Following discussion of the case between the Chief Financial Officer, Chief Operating Officer, the Chief People and Culture Officer and the Deputy Director of Legal Services, the following will be determined:

- Whether an investigation is required as the concerns are deemed to be valid. It may be determined that a preliminary inquiry is required to gather more evidence to support or refute the concerns.
- Whether the employee under suspicion should be suspended, pending criminal and internal investigations.
- Who will carry out the internal investigation. In most cases the Corporate Compliance Directorate will be charged with investigating allegations of fraud and corruption. In some cases, however, it may be determined that the investigation may be carried out by an external investigator, with the support and advice of Internal Audit, if appropriate.

Where it is decided to investigate, resources will be made available to ensure the investigation can be carried out as a matter of urgency. This is important to ensure that:

- Prompt action is taken to ensure facts, evidence and explanations can be captured while events remain current.
- Any on-going losses to fraud are minimised.
- The cost to the University of suspended employees is minimised.
- The University's commitment to its zero-tolerance stance against fraud and corruption is clearly demonstrated.

Where a case has been accepted by the Police for investigation, it is most important that the internal investigation team maintains close liaison with the investigating police officer. This is to ensure that the internal investigation does not in any way hinder or compromise the criminal investigation.

On conclusion of the internal investigation, two reports will be produced and issued to the Chief Financial Officer, the Chief Operating Officer, the Chief People and Culture Officer, the Deputy Director of Legal Services, and the relevant Professional Services Director:

- The primary report will detail the facts determined as a result of the investigation. This report will enable a decision to be made concerning the need for disciplinary action.
- The secondary report will highlight any procedural weaknesses identified during the investigation, and it will make recommendations for improved internal controls.

Disciplinary Procedure

On receipt of the internal investigation report, the following shall be considered:

- If the case has not already been referred to the police, the need for a referral shall be reconsidered in light of the findings of the internal investigation. The decision to make a referral to the police at this stage shall be taken by the officers listed above.
- The Chief Financial Officer, the Chief Operating Officer, the Chief People and Culture Officer, the Deputy Director of Legal Services, and the relevant Professional Services Director will determine whether any disciplinary action is warranted against any University staff.

Redress and Follow-Up Actions

The internal investigation report will quantify the extent of any losses incurred by the University. The Chief Financial Officer, the Chief Operating Officer and the Deputy Director of Legal Services will consider all options available to seek recovery of the losses.

Where the Police do not accept the case, or the Crown Prosecution Service do not seek a criminal prosecution, the Deputy Director of Legal Services should advise on the prospects for recovering losses through a private prosecution through the civil court. The University should seek to recover costs in addition to any losses.

Dependent upon the recommendations, either the Chief Financial Officer and/or the Chief Operating Officer will be responsible for implementing the recommendations made for improved controls in the secondary report following the internal investigation. Where agreed, the recommendations should be implemented as a matter of urgency to ensure protection against recurring cases. The recommended changes will be set out in an action plan identifying the staff involved and the relevant completion dates. The implementation of agreed actions will be verified by Internal Audit as part of its established follow-up procedure.

The Chief Financial Officer will co-ordinate with the Director of Marketing and Communications regarding the content and timing for communicating the outcome of the investigation to internal staff and to the wider public, as considered appropriate.

The Chief Financial Officer will advise and update the Audit and Risk Committee on suspected and actual fraud cases as part of its routine reporting arrangements. This will include the extent of losses, and the key outcomes in terms of sanctions taken, recoveries achieved, and procedural improvements implemented.

10. Contractors' Staff

Staff employed by a third-party contractor are considered to be members of the University community and have the same responsibility as anyone employed directly by the University to raise any matters of concern, including fraud. This is referred to further in the University Speak Up (Public Interest Disclosure) Policy ([WLV Policies - University of Wolverhampton](#)).

If an allegation of fraud relates to the action of a member of staff of a contractor providing services to the University, the Chief Financial Officer should notify the contractor.

Here the Chief Financial Officer regards the alleged fraud as potentially constituting a serious offence, no internal action shall be taken (other than suspension by the contractor of the member of staff involved, where

appropriate) until the matter has been reported to the police. Internal action should be suspended until any subsequent criminal proceedings have been completed or the police have advised that they do not object to the University or the contractor dealing with the matter.

Where there is sufficient information to indicate that the alleged misconduct, if proved, would not constitute a serious offence, the contractor will be required to investigate the matter fully, in accordance with their own procedures, including staff disciplinary procedures if appropriate.

Once the investigation is complete, the contractor must provide the Chief Financial Officer with a copy of the investigation report and details of the action that has been taken.

11. Third parties

Where concerns are raised which relate to a member of the public, the Chief Financial Officer will advise the police if appropriate and take action to ensure appropriate University staff are aware of the issues to prevent any re-occurrence.

12. Complaints

If any person who has raised an issue is not satisfied that their complaint has been properly considered, they should consider following the procedures set out within the Speak Up (Public Interest Disclosure) Policy ([WLV Policies - University of Wolverhampton](#)), or the student complaints procedure, in the case of students ([Current Student Complaints - University of Wolverhampton \(wlv.ac.uk\)](#)).

13. Recovery of Losses

The University will always take appropriate steps to recover any loss caused by fraud, either through criminal or civil proceedings or otherwise.

14. Training

Training involves equipping staff, students (and others where appropriate) with the relevant skills required to comply with this policy. Training relating to this policy and briefing will be made available in a range of formats according to the needs of the trainee and different groups of staff, students and others.

15. Exceptions

There are no exceptions to this policy.

16. Amendments

This Policy and Procedures were approved by the **University's Executive Board and the Audit and Risk Committee** In July 2023. The University may change this Policy and/or Procedures at any time, and where appropriate.

17. Information and Resources

The counter-fraud strategy has clear links and dependencies on a number of other University policies and strategies:

- Financial Regulations
- Ethical Investments Policy
- Speak Up (Public Interest Disclosure) Policy
- Anti-Corruption and Bribery Policy
- Gifts and Hospitality Policy
- Procurement Policy
- Criminal Facilitation of Tax Invasion
- Payment Card Policy
- Expenses Card Policy
- University Travel and Expenses Policy
- Conflict of Interest
- Staff Disciplinary Policy
- Dignity at Work and Study Policy
- Academic Regulations

The above information can be located via the following links:

- University Policy Hub: [WLV Policies - University of Wolverhampton](#)
- Human Resource Page: [Policies and Procedures - University of Wolverhampton \(wlv.ac.uk\)](#)
- Financial Information: [Financial information - University of Wolverhampton \(wlv.ac.uk\)](#)
- Regulations, Codes of Conduct and Bye Laws: [Regulations, Codes of Conduct and Bye Laws - University of Wolverhampton \(wlv.ac.uk\)](#)

18. Key Contacts

Chief Operating Officer	Samantha Waters Samantha.Waters@wlv.ac.uk
Chief Financial Officer	David Reeve David.Reeve@wlv.ac.uk
Transparency Email	Transparency@wlv.ac.uk

19. Contact

For general policy queries, please contact the University Corporate Compliance Team via email: compliance@wlv.ac.uk.

VERSION	v1	AUTHOR/OWNER	Chief Financial Officer
Approved Date	July 2023	Approved By	University Executive Board Audit and Risk Committee
Review Date	July 2026		

Appendix 1: Fraud Response Plan Summary

The University: encourages all of its community to report concerns. Any person, who is concerned about making a report through the channels described in this policy, should follow the procedure outlined in the Speak Up (Public Interest Disclosure) Policy; [WLV Policies - University of Wolverhampton](#)).

Referral to Police: All matters involving suspected criminal activity will be referred to the Police. The referral decision will be taken by the Chief Financial Officer and the Chief Compliance Officer. If an internal investigation is needed before contacting the Police, the need for a referral will be reconsidered once the findings of the internal investigation have been reported.

Action to be Taken when Suspicion Arises

Employees: Suspected fraud must be reported to your line manager as quickly as possible. Where you feel unable to raise concerns with your line manager you can raise concerns with the Chief Financial Officer (David.Reeve@wlv.ac.uk) or the Chief Compliance Officer (Samantha.Waters@wlv.ac.uk). You may choose to report your concerns anonymously or you may request anonymity, while total anonymity may not be guaranteed, every effort will be made to support this, where possible.

Managers: Matters reported as suspected fraud should be listened to and treated seriously with sensitivity. All information currently available should be collected as evidence and **no** investigation should be carried by yourself. The Chief Financial Officer (David.Reeve@wlv.ac.uk) or Chief Compliance Officer (Samantha.Waters@wlv.ac.uk) should be contacted immediately to advise them of the situation.

Governor/Contractors/Third Parties: Suspected fraudulent activity involving a Governor should be reported to the Chief Compliance Officer, who will determine if this should be reported to the chair of the Board of Governors. If as a governor, you become aware of suspected fraud you should report the matter to the Chief Financial Officer or the Chief Compliance Officer. Staff employed by a contractor have the same responsibility to report concerns as those directly employed. Where concerns involve a member of the public, the Chief Financial Officer will report this to the police if appropriate and take the necessary action.

Investigation

Internal Investigation: The Chief Compliance Officer will review all concerns raised, with any associated evidence and decide if an investigation is required, where an investigation is required, this will be carried out as a matter of urgency, by the Corporate Compliance Directorate in most cases. Where a case has been accepted by the Police for investigation, the internal investigation team will maintain close liaison with the investigating police officer. On receipt of the investigation report it will be decided if Disciplinary action is required. All stages of the process that will be followed will be communicated throughout the investigation. Audit and Risk Committee has responsibility for reviewing the outcome of any investigation that is carried out under this policy. The Chief Compliance Officer has responsibility for investigation of any matters referred by the Chief Financial Officer.

Complaints: If any person who has raised an issue is not satisfied that their complaint has been properly considered, they should consider following the procedures set out within the Speak Up (Public Interest Disclosure) Policy, [WLV Policies - University of Wolverhampton](#); or the student complaints procedure, in the case of students ([Current Student Complaints - University of Wolverhampton \(wlv.ac.uk\)](#)).

Appendix 2: Common Examples of Fraud

There are many ways people may try to defraud the University. This could be carried out by employees or people from outside the organisation. The most common of these include:

Fraud from internal sources

- Theft of cash, stocks or assets and attempts to disguise this.
- Over-claiming expenses.
- Claiming overtime not worked.
- Selling waste and scrap.
- Bogue employees on the payroll.
- Forging signatures or altering amounts on documents.
- Writing off recoverable debts.
- Running a private business with University assets.

Fraud from external sources

- Submitting invoices for goods or services not delivered or submitting multiple invoices for the same goods and services.
- Claiming for expenses not incurred or claiming the same expenses multiple times.
- Changing bank details of existing suppliers.
- Collusive bidding.
- False compensation and insurance claims.
- Bribing employees or governors.
- False, official identification used.
- Grant applications.