

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 \(wlv.ac.uk\)](#)).

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