

## Fraud and Bribery Policy

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### Introduction

1. The purpose of this policy and its supporting procedures is to establish controls to ensure compliance with the Bribery Act 2010, all related anti-bribery and corruption regulations and the Fraud Act 2006 and to ensure that HEFCW's business is conducted in a socially responsible manner. This policy applies irrespective of length of service or duration of contract:
  - to employees of HEFCW;
  - to temporary or contract staff engaged by HEFCW, including where their services are contracted via a third party;
  - to secondees, where it is specified in their contract
  - to Council Members, although reference should also be made to the Code of Practice for Members.

### Statement of Policy

2. The aim of this policy is to remind all parties referred to in paragraph 1 above to adhere to the seven principles of public life (set out in **Annex A** of the Fraud and Bribery Procedures) at all times and to safeguard the public resources for which HEFCW is responsible. Fraud and bribery are ever-present threats to these resources and may occur internally or externally and may be perpetrated by staff, consultants, suppliers, contractors or other stakeholders, individually or in collusion with others.
3. HEFCW views fraud and bribery very seriously. All suspected cases will be investigated rigorously and promptly and appropriate legal and/or disciplinary action will be taken in all proven cases of fraud or bribery.
4. HEFCW is committed to the prevention of fraud and bribery and has implemented a system of internal controls to counter these risks. These internal actions are specified in the Fraud and Bribery Procedures.

### Responsibilities and reporting

5. The Head of Corporate Services (HoCS) has overall responsibility for managing the risk of fraud and bribery and is responsible for maintaining and updating the Fraud and Bribery Policy and its supporting procedures every three years, or earlier, if there are legislative changes. The HoCS will be required to submit an annual report on the application of the Fraud and Bribery Policy to Management Board and HR Committee.

### Supporting documentation

6. The Fraud and Bribery Policy is supported by the following:
  - Fraud and Bribery Procedures
  - Equality and Diversity Policy

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- Grievance and Disciplinary Policy
- Grievance Procedures
- Disciplinary Procedures
- Whistleblowing Policy
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- Gifts & Hospitality, Fees and Awards Policy for Staff
- Code of Conduct & Conflicts of Interest Policy
- Code of Practice for Council Members
- Budget and Cash Management
- Welsh Purchasing Card
- Procurement Procedures

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Version	Date	Description
0.1	Sept 09	First draft
0.2	Nov 09	Updated post Management Board Oct 09
0.3	Nov 09	Updated post Equality Impact Assessment
1.1	June 12	Updated with Bribery Act 2010 implications
1.2	June 13	Updated to reflect changes in HEFCW organisational structure
2.0	Sept 14	Updated under general overview of all policies and procedures by HEFCW
2.0	Oct 14	Staff consultation and EIA review – no changes
2.0	Nov 14	Approved by Audit & Risk Assurance Committee
<u>2.1</u>	<u>Nov 17</u>	<u>Reviewed and updated by the Head of Corporate Services</u>
<u>2.2</u>	<u>Nov 17</u>	<u>Changes approved by the Chief Executive</u>

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