

For information

Fraud and Bribery Policy and Procedures - Review

Agenda: 16
HEFCW/18/09

Disclosable

25/01/2018

1 Issue

- 1.1 This paper provides Council with the updated for Fraud and Bribery Policy and Procedures which were discussed and agreed by the Audit and Risk Assurance Committee at its meeting on 6 December 2017.

2 Rationale for paper

- 2.1 The summary of the outcome of the review of the Fraud and Bribery Policy and Procedures was presented to the Audit and Risk Assurance Committee. This review was due to be carried out three years after the documents were last updated in 2014.

3 Recommendations

- 3.1 The Council is invited to:
- i. note the changes to the Fraud and Bribery Policy and Procedures documents.

4 Timing for decisions

- 4.1 There are no timing issues arising from this Council decision.

5 Further information

- 5.1 Contact Nick Williams (029 2085 9646; nick.williams@hefcw.ac.uk)

6 Review process and outcome

- 6.1 As part of the three year cycle for reviewing HEFCW's policies and procedures, as a means of comparison, our documents were compared with the latest equivalent policies and procedures of HEFCE, which were last updated in 2016.
- 6.2 As a result of this review, some very minor changes have been made to the attached Fraud and Bribery Policy (**Annex A**) and Procedures (**Annex B**) as shown by track changes. Due to the nature of the changes, our internal procedures allow them to be approved by the Chief Executive, without being sent out for consultation, before they are presented to the Audit and Risk Committee for final approval
- 6.3 Once change has been to the Policy (**Annex A**) in section 1 to add an explanation of the purpose of the policy in the 'introduction' section
- 6.4 The two main changes made to the Procedures (**Annex B**) are firstly to add a further staff responsibility to section 11 to require full compliance with the Fraud and Bribery Policy and Procedures, otherwise any breach will be treated as a disciplinary offence. The second change is to add a further example to the definition of fraud in Annex B to the procedures by including 'falsely claiming sick leave'.

7 Financial implications

- 7.1 There are no financial implications arising from this paper.

8 Communications implications

- 8.1 The revised policy and procedure will be made available to staff members on the intranet and to Council Members on the extranet.

9 Diversity and equal opportunities implications

- 9.1 This paper has no implications for age, disability, marital/civil partnership, maternity/pregnancy, race, religion or belief, sex, sexual orientation, any other protected characteristic or the Welsh language.

10 Risk Assessment

Risk	Action to address risk
HEFCW fails to update its Financial Regulations to reflect changes in requirements to provide guidance to Council Members, staff and third parties in respect of delegations and parameters governing workplace operations and decisions.	Annual update carried out to ensure guidance is kept up to date.