BORDERS
B
COLLEGE

Working Together

Anti-Fraud and Corruption Policy

March 2019

History of Changes

Version	Description of Change	Authored by	Date
1.1	Bring in appropriate references to SPFM: zero tolerance, danger signs, ways to report concerns, Requirement for reporting to SFC. Terminology updates	H Robertson	January 2019

1.0 Introduction

1.1 One of the essential functions of public sector organisations is to ensure the proper use of public funds. This policy sets out the College's position in the prevention of and response to fraud and corruption.

1.2 In developing this policy, the College has taken account of existing external guidance and legislation, including the Scottish Public Finance Manual, UK Corporate Governance Code 2010 and Bribery Act 2010.

1.3 The College has a zero tolerance culture to fraud and will treat any instances of fraud or corruption by its employees, board members, or contractors as serious breaches of discipline and as potentially criminal acts. Bribery of or by any College employee, board member or contractor for either personal or organisational gain will be similarly treated. The College will co-operate fully with any criminal investigations carried out in response to instances of fraud, corruption or bribery.

2.0 Scope

2.1 This policy forms part of the College's internal control and corporate governance arrangements.

2.2 The policy applies to all activities undertaken on behalf of the College by members of the Board of Management, Senior Management Team and all staff of the College and its subsidiaries.

3.0 Key Principles

3.1 The results of fraud and/or corruption can be costly, time-consuming, disruptive and unpleasant. The College, therefore, sees that the overriding principle to be applied is that of prevention. Where this fails, however, then reporting, investigation and, where necessary, sanctions, will be pursued rigorously and swiftly.

3.2 Preventative measures are identified under five broad headings:

3.2.1 Policies and Procedures
The College shall develop, implement and maintain such policies and procedures so as to reduce, as far as possible, the risks from fraud or corruption. These will include:
- Financial Regulations
- Scheme of Administration
- Financial Procedures

3.2.2 Systems
The College will maintain in place systems which incorporate internal controls, including adequate segregation of duties to ensure that, as far as possible, fraud and corruption can be prevented.

3.2.3 Internal Audit
The College will ensure that it agrees a programme of internal audit assignments to support the systems and procedures already in place and to assist in the reduction of the likelihood of fraud.

3.2.4 Culture
The College will maintain a culture of openness, honesty and accountability. This will be supported by the Whistleblowing Policy.

3.2.5 Staff Recruitment and Training
The College will ensure references are taken up for all permanent and temporary staff. As part of induction, staff will be made aware of all policies and procedures pertinent to their post, including those concerning governance. Training materials will be developed for completion by all staff.

3.2.6 Danger signs

Signs to be alert to, to detect fraud include (not an exhaustive list):

- Photocopies of documents where originals would be expected
- Discrepancies in dates and signatures
- Unexpected queries from stakeholders or suppliers, eg bank account changes
- Requests for non standard payments
- Unexpected trends
- Excessive spending habits of staff / contractors
- Inappropriate relationships with suppliers
- Reluctance of staff to take leave
- Abnormal travel and subsistence claims, overtime or flexible working patterns.

3.3 The principles to be observed for the reporting and investigation of fraud and corruption are as follows:

3.3.1 Concerns should be reported either to line management, the Head of Human Resources, Internal Audit, or in accordance with the College's Whistleblowing Policy. Contact details for Internal Audit can be obtained from the PA to the Vice Principals. Our comprehensive fraud response plan will include a detailed investigation of any concerns.

3.3.2 The College will deal with any instances of fraud or corruption swiftly, taking disciplinary action as necessary and informing the police if appropriate.

3.3.3 In the event that fraud is suspected on the part of contractors, agency workers or by staff involved in agency or contract work on behalf of other bodies, procedures and responsibilities for reporting and investigation are the same as for staff. The College will also inform and involve employing contractors or agencies when appropriate.

3.3.4 Cases of fraud with a value of £5,000 or above should be reported to the Scottish Funding Council by the Vice Principal of Finance and Corporate Resources, or the Vice Principal Curriculum and Student Services, or the Principal.

4.0 Responsibilities

4.1   The Regional Board is responsible for ensuring the effectiveness of internal control of the College, based on information provided by the Executive Team.

4.2   The Audit Committee is responsible for agreeing this policy and monitoring its implementation and effectiveness.

4.3   The Senior Leadership Team is responsible for developing appropriate systems of internal control to reduce the likelihood and impact of fraud or corruption.

4.4   The Vice Principal Finance and Corporate Services is responsible for the implementation of this Policy.

4.5   Departmental managers are responsible for the application of internal controls to mitigate risks within their specified areas of responsibility.

4.6   All staff members are responsible for adhering to the systems of internal control which are relevant to their role.

5.0 Related Documents

5.1   Financial Regulations

5.2   Financial Procedures Manual

5.3   Risk Management Policy

5.4   Whistleblowing Policy

5.5   Procurement Policy

5.6   Gifts and Hospitality Register

6.0 Review

6.1   This policy will be reviewed every 3 years or whenever Corporate Governance changes affect any part of it.

Equality Impact Assessment Tool

(Rapid impact assessment tool)

What Impacts may there be from this proposal on any group's ability to use the College services?

Policy: Anti-Fraud and Corruption Policy

Positive Impacts (Groups affected)	Negative Impacts (Groups affected)
n/a	n/a
Actions taken to alleviate any negative Impacts:	
n/a	
Recommendations:	
none	

From the outcome of the rapid equality impact assessment, have negative impacts been identified for any protected characteristic or any other potentially disadvantaged group?

Has a full Equality Impact Assessment been recommended?

Yes ☐

No x

Reason for recommendation:

Anti-Fraud and Corruption Policy

Status: Approved by Audit Committee
Dated: November 2008 (revised September 2009, November
                   2012, August 2014, January 2019)
Author: Vice Principal - Finance and Resources
Review Date: January 2022
Equality Impact Assessed: Yes