



**Working Together**

# **Anti-Fraud and Corruption Policy**

**November 2008**



**INVESTORS  
IN PEOPLE**

## 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.

## 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.

## 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 in accordance with the College's Whistleblowing Policy. A detailed investigation of any concerns will be undertaken.

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.

## **4.0 Responsibilities**

- 4.1 The Board of Management is responsible for ensuring the effectiveness of internal control of the College, based on information provided by the Senior Management Team.
- 4.2 The Audit Committee is responsible for agreeing this policy and monitoring its implementation and effectiveness.
- 4.3 The Senior Management Team is responsible for developing appropriate systems of internal control to reduce the likelihood and impact of fraud or corruption.
- 4.4 The Director of Finance and Resources 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 Scheme of Administration
- 5.4 Risk Management Policy
- 5.5 Whistleblowing Policy

## 6.0 Review

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

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