



# COUNTER FRAUD, BRIBERY AND CORRUPTION POLICY

Date approved: 11 February 2022  
Approved by: SMT  
Responsible Manager (s): Financial Controller  
Executive Lead: Vice Principal Finance and Planning

Applicable to staff:	Yes
Applicable to students:	Yes
Accessible to students:	Yes
Accessible to general public: (including clients)	Yes

## Consultation

Consultation undertaken with:		Date:
• SMT	Yes	11/02/22
• AMT	Yes	08/02/22
• CCMT	Yes	12/01/22

*\* please delete as appropriate*

Policy review frequency: Every 2 years

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## **1. Scope and purpose of the policy**

- 1.1 The purpose of this policy is to set out B&FC's stance on fraud, bribery and corruption and its approach to preventing, detecting, reporting and investigating fraud, bribery and corruption.
- 1.2 This policy is applicable to, and must be followed by its suppliers, students, employees, partners, contractors and agents.
- 1.3 This policy applies to all separate legal entities owned and controlled by B&FC.

## **2. Policy statement**

- 2.1 B&FC has a 'zero tolerance' policy towards fraud, bribery and corruption. This means that B&FC:
  - a) does not accept any level of fraud, bribery or corruption within the organisation, by any individual or organisation receiving B&FC funds or representing B&FC; and
  - b) will always seek to take appropriate disciplinary and/or legal action against those found to have perpetrated, be involved in, or assisted with fraudulent or other improper activities in any of its operations.
- 2.2 B&FC is committed to maintaining an anti-fraud culture and keeping the opportunities for fraud, bribery and corruption to the absolute minimum.
- 2.3 B&FC requires all employees to act honestly and with integrity at all times and to safeguard the resources for which they are responsible. Failure to comply could result in criminal, civil and/or disciplinary action.
- 2.4 B&FC requires all those receiving B&FC funds or representing B&FC, including its suppliers, students, partners, contractors and agents, to act in accordance with this policy.
- 2.5 B&FC is committed to conducting business fairly, openly and honestly and in accordance with the highest ethical and legal standards.
- 2.6 B&FC complies with all applicable legislation, including the Fraud Act 2006, the Bribery Act 2010, and with other regulatory requirements and applicable guidance. Within The Code of Conduct on Public Interest Disclosure the Board of B&FC establishes and promotes the highest standards of probity within B&FC and commits itself to eliminating fraud, corruption and malpractice.

### **3. Accountability**

The Financial Controller is responsible for keeping the policy up to date in line with all legal requirements.

### **4. Student Involvement**

Not applicable.

### **5. Linked Policies**

- Financial Regulations
- Employee Public Interest Disclosure Policy
- IT and Information Security Policy
- IT Systems Acceptable Use Policy
- Clear Desk and Clear Screen Policy
- Curriculum policies. Exams.
- Overseas students. Visa support
- Student Support policies/procedures. Bursary, discretionary grants.

### **6. Linked procedures**

- Financial Policy and Procedures, including:
  - Anti Money Laundering procedure
  - Gifts and Hospitality procedure and register
- Employee Public Interest Disclosure Procedure

## 1. Equality, Diversity and Inclusion Impact Assessment

Impact Assessment for the 4 strands of Equality, Safeguarding and Inclusion, Health and Safety and Sustainability	
Initial Form to be completed with Risk Assessments or as part of a proposal or change to a policy, plan or new way of working	
<p>Title of Activity: Counter Fraud, Bribery and Corruption Policy</p> <p>Author and Date: Steve Yeoman 10/01/22</p>	<p><input checked="" type="checkbox"/> Revision</p> <p>Expected Implementation Date: Jan 2022 What is the review date? Dec 2023</p>
<p><b>Equality and Diversity.</b> Which of the characteristics maybe impacted upon? And, if yes, how has this been considered? What are the risks? What are the benefits?</p>	<p><input checked="" type="checkbox"/> No</p>
<p><b>Safeguarding:</b> Are there any aspects of this proposal which could cause a learner/member of staff/visitor to feel unsafe? If yes, how has this been considered? What are the risks? What are the benefits?</p>	<p><input checked="" type="checkbox"/> No</p>
<p><b>Health and Safety:</b> Have any risks been identified? If yes, how has this been considered? What are the risks? What are the benefits?</p>	<p><input checked="" type="checkbox"/> No</p>
<p><b>Sustainability:</b> Are there expected benefits or impacts on sustainability issues? If yes, how have these been considered?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>The avoidance of fraud, bribery and corruption will support B&amp;FC sustainability.</p>
<p><b>Evidence:</b> What evidence do you have for your conclusions and expectations for these conclusions? How will this impact be monitored for all these considerations?</p>	
<p>Is this policy of a high/medium or low risk?:</p>	<p><input type="checkbox"/> High      <input type="checkbox"/> Medium      <input checked="" type="checkbox"/> Low</p>