



UTC Cambridge Fraud and Bribery Policy

Lead member of SLT: HRM/Business Manager (Elizabeth Andrews)
Designated Governor: Finance and Audit Committee Chair (Scott Haldane)

Legislation and reference:

EFA Academies Financial Handbook [Academies Financial Handbook 2015 - Publications - GOV.UK](#)
Fraud Act 2006
Bribery Act 2010
Education Act 2002
Proceeds of Crime Act 2002

Associated documentation

UTC Cambridge Finance Manual (February 2016)
UTC Cambridge Gifts and Hospitality Policy
UTC Cambridge Whistle blowing Policy

UTC Cambridge Vision

UTC Cambridge: Delivering Future Scientists

UTC Cambridge Mission

Through an innovative curriculum, developed with leading scientists from industry and academia, UTC Cambridge builds bespoke learning solutions delivered in a state of the art science and technology environment that empowers students to manage their academic and career development.

UTC Cambridge Values

We set ourselves challenging goals, are agile and resilient, to achieve our personal best.
By respecting one another we enhance our experience and benefit from different perspectives.
We take individual responsibility, ensuring team delivery.
By respecting our environment, our world, we make a difference.
We celebrate positive contribution and aspire to excellence.
We are morally and ethically responsible in scientific and environmental innovation.

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1. Aims and Objective of the Procedure

- 1.1. UTC Cambridge (hereafter UTCC) is committed to conducting its activities fairly, openly and honestly, in accordance with current legislation and with a high standard of integrity.
- 1.2. UTCC has no tolerance for bribery or fraud and believes that action against either is in the broader interest of society.

- 1.3. UTCC is committed to an effective anti-fraud and corruption strategy designed to encourage prevention, promote detection and clarify responses through a defined plan, which incorporates investigatory action.
- 1.4. Where bribery and fraud are shown to have occurred, UTCC will take firm action. It will be treated as a serious disciplinary offence, which may include dismissal and legal action.
- 1.5. This fraud policy covers all activities of UTCC and its subsidiary associated undertakings.

2. Scope of the Procedure

- 2.1. The main responsibility for preventing and detecting fraud and or bribery lies with the Senior Leadership Team. However it is the responsibility of all staff to remain alert and vigilant to the possibility that UTCC may be a victim of fraud, irregularity and unacceptable activity.
- 2.2. Fraud and bribery is disruptive, costly and time consuming and at times unpleasant. The emphasis is therefore on the prevention of fraud and bribery.

3. General Principles

- 3.1. Bribery and Fraud are complex legal concepts however for the purpose of this policy, the definition is defined as the use of deception with the intention of
 - Gaining an advantage personally, for family or friends;
 - Or causing loss (financial and otherwise) to UTCC or one of its subsidiary undertakings.
- 3.2. Main types of irregularity are:
 - Theft including the misuse of funds, assets or cash.
 - False accounting meaning the dishonestly destroying, altering or hiding any record or document with a view to personal gain or gain for someone else.
 - Intent to cause loss to UTCC.
 - Supplying information, which is or maybe false.
 - Abuse of position including authority, resources or information either for personal gain, gain for somebody else or cause loss to UTCC.
- 3.3. Some examples include:
 - Stealing or misuse of cash from cash boxes or from other funds.
 - Theft of stock including stationery for private use.
 - Misuse of assets including information and intellectual property for example the minibus, computers, telephones and other equipment.
 - Setting up accounts and paying bogus suppliers
 - Paying for goods that have not been received
 - Approving/paying inflated prices for goods and services.
 - Travel claims overstated
 - False claims for overtime
 - Failing to work full contracted hours
 - Falsification of sickness self-certification
 - Computer Fraud
- 3.4. Staff and students are expected to act at all times in a manner that is fair, impartial and without favouritism or bias.
- 3.5. No member of staff or persons acting on behalf of UTCC or providing services for shall seek a financial advantage for the College through bribery,; nor shall they offer, promise give, request, agree to receive or accept a bribe for any purpose.
- 3.6. Staff and persons acting on behalf of UTCC must adhere to the UTCC policy on Gifts and Hospitality.
- 3.7. Any suspicion of bribery or fraud should be reported immediately to:

- Your manager
- the HRM/Business Manager (01223 724303)
- the Principal (01223 724333)
- the Chair of the Finance and Audit Committee

3.8. If, exceptionally, the concern is about the Principal, the HRM/Business Manager or a UTCC Governor your concern should be raised with the Chair of Governors who will decide how the investigation will proceed. This may include an external investigation.

4. Warning Signs

4.1. Whilst this list is not exhaustive and by no means of being proof on their own of fraud or bribery, the examples below may indicate fraud or bribery and should put managers and staff on the alert:

- Altered documents (correcting fluid, different pen or handwriting)
- Claim form details not readily checkable
- Changes in normal patterns of cash handling or travel claim details
- Erratic or difficult to read text with details missing
- Delay in completion or submission of claim forms
- Lack of evidence in support of claim forms
- Staff under constant financial stress
- Staff choosing not to take annual leave and so preventing others becoming involved in their work especially if solely responsible for a 'risk' area
- Working late without good reason
- Refusal of Promotion
- Insistence on dealing with a particular supplier or individual

5. Dealing with concerns

5.1. If you suspect a fraud or bribery has been committed then you must:

- Report the situation to your manager who will promptly attempt to confirm your suspicions discreetly. If a potential fraud or bribery has been committed, then they will inform the HRM/Business Manager and the Principal.
- Safeguard any evidence and discreetly keep a record of any locations including dates, times and locations.
- Raise concerns to someone outside your direct management line if you suspect someone in that line. Other relevant people are the HRM/Business Manager (01223 724303), the Principal (01223 724333) or UTCC Governor, Scott.Haldane@cpft.nhs.uk.

5.2. You must not:

- Keep quiet and hope the problem will go away
- Confront the individual
- Contact the police directly as that is the responsibility of the Principal
- Discuss with anyone else other than the person the concern was raised with as any alleged fraud or bribery must remain confidential at all times.

5.3. Concerns can be raised in the knowledge that they will be treated in confidence and properly investigated. UTCC is committed to dealing with concerns confidentially, swiftly and thoroughly.

5.4. Members of the public and others coming into contact with UTCC are also encouraged to raise any concerns.

5.5. If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, UTCC will recognise your concern and you have nothing to fear. If however, you make an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action, may be taken.

6. Prevention and Detection

- 6.1. UTCC recognises the importance of prevention and has in place various strategies including effective leadership and management, auditing and employee screening.
- 6.2. All financial systems and procedures take into account the need for internal checks and controls.
- 6.3. The possible misuse of information technology is prevented through the management of physical access to terminals with electronic access systems.
- 6.4. All staff are encouraged to keep all log in details a secret and for passwords/combinations to be changed.
- 6.5. During the recruitment of new staff, references are routinely taken up and candidates are required to provide evidence of their qualifications.