



ANTI-FRAUD POLICY

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1. Introduction

The University is committed to the proper use of funds it receives. As a consequence, it is essential that everyone associated with the University - including staff, students, employees, contractors and third-parties - are aware of the risk of fraud, corruption, bribery, theft and other activities involving dishonesty, in all its forms.

The University aims to reduce instances of fraud to the absolute practical minimum - and to also put in place arrangements that hold any fraud to a minimum level on an ongoing basis.

2. Definitions

Fraud can be defined as (i) wrongful or criminal deception intended to result in financial or personal gain and (ii) a person or thing intended to deceive others, typically by unjustifiably claiming or being credited with accomplishments or qualities. Both definitions are directly applicable to the Higher Education sector.

Fraud can take many different forms. Bribery & money laundering are two specific types of fraud for which the University is required to have in place specific preventative measures:

- Bribery - this can be defined as an inducement or reward offered, promised or provided in order to gain commercial, contractual, regulatory or personal advantage.
- Money laundering relates to any involvement or interaction with the proceeds of crime. This can apply to cash, goods, services and property (including intellectual property rights). The three main types are
 - Concealing, disguising, converting, transferring criminal property or removing it from the UK;
 - Entering into or becoming concerned in an arrangement which you know or suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person;
 - Acquiring, using or possessing criminal property.

University's Anti-money laundering policy is available on the staff intranet – see [Anti Money Laundering Policy - My Norwich Uni](#)

3. Counter-fraud policy objectives

3.1 Most organisations adopt a multi-faceted approach to fraud and the University is no exception. The eight key objectives of the University's counter-fraud policy are:

1. Establishment of a *counter-fraud culture*
2. Maximum *deterrence* of fraud
3. Active and successful *prevention* of any fraud that cannot be deterred
4. Rapid *detection* of any fraud that cannot be *prevented*
5. Professional *investigation* of any *detected* fraud
6. Effective internal and external *actions and sanctions* against people found to be committing fraud, including legal action for criminal offences

7. Effective *communication and learning* in relation to fraud, and
8. Effective methods of *seeking redress* when/where fraud has been perpetrated

The overriding objective of the University's counter-fraud activity is to ensure that (i) fraud is seen as unacceptable by each and every stakeholder and (ii) counter-fraud is seen to have the unwavering focus of the University as a whole.

- 3.2 This document sets out the University's policy and procedures for dealing with suspected cases of fraud, including corruption, and includes summarised instructions about what to do, and who to contact/notify, should any fraud-related concerns arise.
- 3.3 At a practical level, fraud is deemed to be deliberate intent to deprive the University (and its associate activities) of money or goods through the falsification of any records or documents (e.g. submission of false invoices, inflated time records or travel claims and/or the use of purchase orders to obtain goods for personal use). This is an important distinction, intended to clarify the crucial difference between deliberate fraud and unintentional error, removing - wherever possible - any potential confusion or ambiguity.

4. Counter-fraud policy

- 4.1 The University is absolutely committed to the highest standards of honesty, accountability, probity and openness in its governance. As a direct consequence of this, the University is committed (i) to reducing fraud associated with any of its activities, operations and locations to the absolute practical minimum and (ii) to the robust investigation of any fraud issues that should arise. Any such investigation will be conducted without regard to factors such as position, title or length of service.
- 4.2 Where any acts of fraud or corruption are proven, the University will make every endeavour to ensure that the perpetrator(s) are dealt with to the full extent of the law and University disciplinary policy/contractual processes (where a third-party is involved), and will also take every step to recover any and all losses in full.

It is the responsibility of everyone associated with the University - including staff, students, employees, contractors and third parties - to report any fairly based suspicions of fraud or corruption. The University's Whistleblowing Policy is in place to protect anyone reporting reasonable suspicion or who has concerns about possible wrongdoing – see [Whistleblowing Policy - My Norwich Uni](#)

The Public Interest Disclosure Act 1998 gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing serious concerns and information which is considered to be in the public interest.

- 4.3 This policy applies to any fraud, or suspected fraud involving everyone and anyone associated with the University - including staff, students, employees, contractors and third parties.

5. Common types of University and Higher Education fraud

Fraud can often be associated with direct financial gain, such as procurement and invoicing fraud. However, in the Higher Education sector, academic fraud is a further possibility, including fraud related to immigration, admissions, examinations and awards.

Examples of fraud can include, but are not limited to:

1. A fraudster posing as one of our suppliers in order to get us to change the bank details for where we make payments, which if successful would mean us inadvertently paying the fraudster rather than our bona fide supplier.
2. Phishing emails or phone calls to students and staff in an attempt to extract personal data and/or money from them.
3. Any theft of university property, including the unauthorised use or removal of university equipment.
4. Purchasing fraud, such as approving or paying for goods not received, paying inflated prices, or accepting any bribe.
5. Making false claims, including for travel & subsistence, accepting pay for time not worked, or falsifying sickness.
6. Academic fraud including immigration, admissions, examinations and awards
7. Fictitious qualifications or references included on job application forms

6. Counter-fraud – What to do if a fraud is suspected

Anyone who suspects a fraud you should contact the Chief Operating Officer without delay to explain their suspicions. The person should not discuss with their line manager (if the suspected fraudster is an employee) or confront the person they suspect of the fraud. If the suspected fraud is thought to involve the Chief Operating Officer and/or the Vice-Chancellor, they should notify the Chair of the Audit & Risk Committee directly of their concerns.

The contact details for the Chair of Audit & Risk Committee can be obtained from the Clerk to the Governors, Angela Beckett: clerk@norwichuni.ac.uk.

7. Key responsibilities

It is the duty of all members of staff, management and the University Council to notify the Chief Operating Officer immediately whenever any matter arises which involves, or is thought to involve, irregularity, including fraud, corruption or any other impropriety.

The Chief Operating Officer shall immediately invoke the Fraud Response Plan, which will include the requirement to hold a meeting of the following project group to decide on the initial response:

- Vice-Chancellor (Chair)
- Chair of the Audit & Risk Committee
- Chief Operating Officer

There may be a limited number of minor cases of fraud (or attempted fraud) where the Chief Operating Officer will deem it unnecessary to convene a meeting of the project group. This would only be where the fraud (or attempted fraud) is perpetrated by a 3rd party unconnected with the University and where the actions required to be taken to resolve the matter are unambiguous and straight forward. Examples include erroneous transactions on a University credit card and fraudulent Direct Debits set up using the University's bank details. In such cases, the Chief Operating Officer may ask the Director of Finance and Planning to investigate and resolve the situation on behalf of the University.

Further details can be found in the University's Fraud Response Plan.