

## Anti-fraud policy

### Policy statement

The ACU is committed to the prevention of fraud and the promotion of an anti-fraud culture. The ACU operates a zero-tolerance attitude to fraud and requires staff, members of Council, applicants for and recipients of ACU grants and suppliers to act honestly and with integrity at all times, and to report all reasonable suspicions of fraud.

The ACU will investigate all instances of actual, attempted and suspected fraud committed by staff, members of Council, applicants for and recipients of ACU grants and suppliers and other third parties and will seek to recover funds lost through fraud. Perpetrators will be subject to appropriate action, including legal action.

This policy is endorsed and supported by the ACU Council.

### Definition of fraud

The term 'fraud' is commonly used to describe the use of deception to deprive, disadvantage or cause loss to another person or party; or secure unwarranted personal gain.

Examples include falsely claiming academic and other achievements, falsely claiming expenses, not declaring absences from work, failing to return ACU resources (e.g., cash advances, mobile phones, laptops or other equipment). Individuals can be prosecuted under the Fraud Act 2006 if they make a false representation, fail to disclose information or abuse their position.

### Key responsibilities

The Council is responsible for:

- Regularly reviewing this anti-fraud policy statement and compliance to ensure it remains effective and relevant.
- The Senior Management Team is responsible for:
  - Investigating all allegations of fraud and pursuing appropriate action, including legal action.
  - Developing, implementing and maintaining adequate systems of internal control to prevent and detect fraud.
  - Ensuring that the ACU's reputation and assets are protected against fraud.
  - Reporting to Council on all aspects of fraud risk management including known or suspected fraud.
  - Monitoring compliance with internal controls and agreed policies and procedures.
- All staff are responsible for:
  - Assisting in the investigation of suspected fraud.

### Reporting suspicions

Staff and grant applicants / recipients must report concerns about actual, attempted or suspected fraud to any member of the ACU's Senior Management Team. Individuals should not attempt to investigate any fraud themselves.

The Public Interest Disclosure Act 1998 protects employees who raise concerns about certain matters of public interest in good faith. Staff can obtain free independent advice from the charity Public Concern at Work on 020 7404 6609 ([www.pcaaw.org.uk](http://www.pcaaw.org.uk)).