



Greenhead College Corporation

**CODE OF PRACTICE
COVERING FRAUD AND
CORRUPTION**

Reviewed November 2008

INTRODUCTION

1. The aim of this Code of Practice covering fraud and corruption is to assist Greenhead College staff in maintaining the highest standards of integrity and probity of Greenhead College.
2. With this in mind, the following sections are included:
 - duties of the College
 - action by members of staff
 - formal procedures

DUTIES OF GREENHEAD COLLEGE

1. Greenhead College has a number of responsibilities in such matters. These are to:
 - maintain efficient and effective systems of internal and management control which minimise the risk of fraud and irregularity;
 - ensure that all staff and members of the Corporation are aware of their duties and the required standards of conduct;
 - in these cases, the member of staff will receive protection and support against harassment or victimisation by Greenhead College;
 - safeguard the rights of any persons subject to investigation;
 - ensure that there is a full and speedy investigation, take proper action and report the outcome to the appropriate bodies.
2. The College's Audit Committee has an important role in overseeing the operation of the policies and procedures set out in this paper. It is therefore important that its members should, at all times, hold the trust and confidence of Greenhead College's staff.

ACTION BY MEMBERS STAFF

1. All staff should have concern to maintain and promote Greenhead College's high standards of integrity and probity. If any member of staff has reasonable grounds for suspecting fraud or other irregularity, it is their duty to report this to the College.
2. Staff should be aware that Greenhead College takes this subject seriously and is supportive of those members of staff who report matters.
3. It is potentially unpleasant and disruptive for a member of staff to make a complaint or allegation against another. In these cases, the following considerations are relevant:
 - the member of staff has a clear duty to report the suspected irregularity without delay;
 - he/she has a duty to act reasonably and without malice;
 - during the process of investigation, Greenhead College will try to preserve anonymity of the person making the allegation. However, at a later stage of the investigation, it may be necessary to reveal her/his identity;
 - in these cases, the member of staff will receive protection and support from Greenhead College, against harassment or victimisation.

4. Any member of staff wishing to make a complaint or allegation either verbal or written should make formal and direct contact with either their Line Manager or Senior Manager. He/she should give all relevant information and evidence and state the grounds for the allegation. The Principal and the College Business Manager will decide whether further action is necessary.
5. A member of staff making an allegation against any of the office holders named in this paper should approach the immediate superior of the office holder (as appropriate). Members of staff should be reminded that matters can exceptionally be raised externally.
6. You may invite your trade union representative or a friend to be present during any meetings or interviews in connection with the concerns you have raised.
7. **Untrue Allegations:**
If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

FORMAL PROCEDURES

1. Greenhead College, and specifically the College Business Manager, have a responsibility to review, appraise and report upon the extent to which the College's assets and interests are accounted for and safeguarded from losses of all kinds arising from fraud and other offences (Standing Financial Procedures).
2. Anyone who identifies a possible irregularity, or who is informed of such a possibility, should notify immediately either their Line Manager or Senior Manager, who will notify the Principal or College Business Manager.
3. The Principal or College Business Manager should inform senior staff in a line management role where the suspected irregularity has arisen, unless that Officer is implicated in the matter.
4. If it is clear to both the Principal and the College Business Manager that any possible irregularity is of minimal effect and has arisen by accident, the College Business Manager should keep a formal record of this conclusion and of any action taken. Such records will be available to the auditors. In any other case, the Principal and the College Business Manager will immediately investigate the matter. If there is a prima facie case for full investigation, the College Business Manager will immediately notify the Chair of the Audit Committee, the Chair of the Corporation and the external auditors.
5. At any stage during the procedures, Greenhead College may use its powers under the Personnel procedures to suspend or dismiss staff involved in the suspected irregularity. Having regard to the requirements of the Police and

Criminal Evidence Act 1984 and the need not to prejudice any future criminal investigations, the College Business Manager will arrange for the police to be informed at the first indication of any serious concerns.

6. The Principal and the College Business Manager will agree arrangements for any investigation. The detailed procedures will depend on the nature of the case but will take into account:
 - the need to complete the investigation with all due speed, provided that this does not compromise comprehensiveness and thoroughness;
 - the applicability of Greenhead College's Personnel Procedures to the case;
 - the need to use other external advisers, such as solicitors;
 - the possibility of formal legal action;
 - the need to safeguard the rights of any person involved.
7. Within ten working days of a concern being raised, the responsible person (either the Principal or College Business Manager) will write to you:
 - acknowledging that the concern has been received;
 - indicating how we propose to deal with the matter;
 - giving an estimate of how long it will take to provide a final response;
 - telling you whether any initial enquiries have been made;
 - supplying you with information on staff support mechanisms, and
 - telling you whether further investigations will take place and if not, why not.
8. After completing the investigation, a written report will be produced and sent to the Chairman of the Audit Committee, the Principal and the College Business Manager. This report will include the following:
 - a conclusion as to whether there has been a fraud or other irregularity;
 - its nature and extent;
 - its effects on Greenhead College;
 - who was involved;
 - recommendations to improve systems of control.
9. The Chair of the Audit Committee may call a special meeting of the Committee to discuss the report and its consequences should he deem this

to be necessary otherwise the matter will form part of the agenda of the next scheduled meeting. He will also inform the Chair of the Corporation of the planned meeting.

10. The Audit Committee will consider, inter alia, whether:

- Greenhead College should proceed with (further) legal action;
- there should be disciplinary hearing;
- action is necessary to prevent further fraud or other irregularities.

The Chair of the Audit Committee will then make a full report to a meeting of the Corporation. If the investigation or report of the Committee requires it, the Principal will instruct action to be taken against the member of staff using the Personnel Procedures.

11. If any of the office holders named in this paper are themselves implicated in the suspected irregularity, they will have no involvement in the procedures. In such cases, their role will be taken by the immediate superior of the office holder (as appropriate) in the relevant stages.

HOW THE MATTER CAN BE TAKEN FURTHER

1. This policy is intended to provide you with an avenue within the College to raise concerns. The College hopes you will be satisfied with any action taken. If you are not, you may raise it, in confidence, with the Chair of the Corporation. If you are still not satisfied you may feel it is right to take the matter outside the college. The following are possible contact points:

- the designated independent person or organisation;
- (here insert the name of any independent person or organisation nominated for the purpose by the College eg the LSC);
- the external auditor;
- your trade union;
- your local Citizens Advice Bureau;
- relevant professional bodies or regulatory organisations;
- a relevant voluntary organisation;
- the police.

2. If you do take the matter outside the College, you should ensure that you do not disclose confidential information.

To be re-approved, 12/08 – original approved by the Governors on 5th December 2005