

Policy & Procedure	Anti-Fraud and Corruption Policy
Policy Area	Finance
Version Number	4
Approving Committee	Audit Committee
Date of Approval	8 September 2021
Date of Equality Impact Assessment	16 September 2021
Date of Review	8 September 2023
Responsible Senior Manager	Director of Finance

History of Amendments

Date	Version/Pages/Sections Affected	Summary of changes
01/08/2017	2 - Whole Document	Reviewed and updated in accordance with 2-year review period.
22/9/2019	3 - Whole Document	Reviewed and updated following 2018-19 fraud investigations and legal review.
4/8/2021	4 – Whole Document	Reviewed and updated in accordance with 2-year review period.

Policy Statement

The College is committed to providing a high standard of service and accountability. The College has clear systems and procedures to assist in the prevention and investigation of fraud, bribery and corruption within the College and from external sources and sets out the procedures in the event that fraud is suspected or detected. The College is committed to ensuring that these arrangements keep pace with future developments, in both preventative detection techniques.

Equality Statement

The College is committed to providing equal opportunities to ensure its students, staff, customers and visitors are treated equally regardless of gender reassignment; race; religion or belief; disability; age; marriage and civil partnerships; pregnancy and maternity; sexual orientation; sex.

Please note this Policy is available in other formats, to request another format please email Charlene.Clark@wcs.ac.uk

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1. Introduction

- 1.1 One of the basic principles of public sector organisations is to ensure the proper use of public funds. It is therefore important that all those who work in the public sector are aware of the risk and the means of enforcing the rules against fraud/theft and other illegal acts involving corruption, dishonesty or damage to property.
- 1.2 In developing this policy, the College has taken account of existing external guidance and legislation, including the Scottish Public Finance Manual, UK Corporate Governance Code 2010 and Bribery Act 2010.
- 1.3 The College has a zero-tolerance culture to fraud and will treat any instances of fraud or corruption by its employees of the College and any of its subsidiaries (including temporary and agency workers and any unpaid members of staff and voluntary workers) (“employee”), board members, or service providers/contractors (which includes agents and others who represent the College wherever located) (“contractor”) as serious breaches of discipline and as potentially criminal acts. Bribery of or by any College employee, board member or contractor for either personal or organisational gain will be similarly treated. The College will co-operate fully with any criminal investigations carried out in response to instances of fraud, corruption, or bribery.

2. Purpose

- 2.1 The purpose of this Policy is to provide guidance to all staff on the action, which should and will be taken when fraud, theft or corruption is suspected. Such occurrences may involve employees of the College, suppliers/contractors or a third party. This Policy sets out the Board of Management’s response plan for detected or suspected fraud. It is not the purpose of this Policy to provide direction on the prevention of fraud.

3. Definitions

Fraud for the purpose of this Policy is where someone achieves a practical outcome by the means of false pretence (which includes making false representations, dishonestly failing to disclose information and dishonestly abusing their position) including the appropriation of cash, property or other benefit by deception. This includes any fraudulent crime conducted electronically or via a computer or computer data.

3.1 **Corruption** is generally the abuse of entrusted power for private gain which includes the dishonest influence of actions and decision.

3.2 **Bribery** is either giving or receiving an inducement or reward offered, promised, or provided to gain personal, commercial, regulatory, or contractual advantage.

4. Awareness

4.1 The College recognises that the continuing effectiveness of this process depends largely on the awareness and responsiveness of Board members, staff, students and contractors and their willingness to highlight these issues. It is essential that Board members and employees are made aware of this Policy and its procedures when they join the College and either receive a copy for inclusion in their personal records or have access to this policy online and, in addition, have ready access to all other relevant documents, policies and procedures, which regulate the College's activities.

4.2 Action will be taken on a regular basis to remind both Board Members and staff of the importance the College places on avoiding and preventing fraud, bribery and corruption.

5. Scope

- 5.1 This Policy applies to all employees, Board members including co-opted members and volunteers of West College Scotland. This also applies to contractors and business partners where a relationship is in place for them to undertake duties on behalf of the College.
- 5.2 The College recognises that it is already subject to a high degree of external scrutiny of its affairs by a variety of parties. This includes the general public, staff, students, Internal Auditors, Board of Management, Scottish Ministers/ the Scottish Government, Members of the Scottish Parliament (MSPs), the Scottish Funding Council (SFC), External Auditors, Education Scotland, HM Revenue and Customs and Audit Scotland.
- 5.3 The College has internal and external auditors who advise the Board of Management about the adequacy of arrangements for the prevention and detection of fraud and corruption.
- 5.4 While this external scrutiny assists in protecting against fraud and corruption the College believes a clear statement of its own strategy is needed.
- 5.5 The key elements of the College's strategy to combat fraud and corruption are:
- An open and honest culture
 - Adequate preventative measures
 - Systems for detection and investigation
 - Understanding and awareness within the College
 - The adoption of a Public Interest Disclosure (Whistleblowing) Policy
- 5.6 This Policy should be read in conjunction with the College's (i) Equality Diversity and Inclusion Policy and its documentation regarding compliance with the Equality Act 2010, and (ii) [Public Interest Disclosure \(Whistleblowing\) Policy and Procedure](#).

- 5.7 For simplicity, this Policy will refer to “fraud” which shall encompass all the behaviours set out in the definitions, except where the context indicates otherwise.
- 5.8 The Board of Management already has procedures in place that reduce the likelihood of fraud/theft occurring. These include standing financial procedures, a system of internal control and a system of risk assessment. In addition, the Board of Management will ensure that a risk awareness culture exists by issuing guidance on prevention of fraud.
- 5.9 It is the responsibility of the College and its’ management to maintain adequate and effective internal controls to facilitate detection of fraud. The role of Internal Audit is to evaluate these systems of control. It is not the responsibility of Internal Audit to detect fraud, but to identify potential weaknesses in systems that may give rise to error or fraud.
- 5.10 The contents of this Policy have been set out as follows:
- **Section 6** sets out the Public Sector Values that must underpin the activities and culture of the College.
 - **Section 7** sets out the Board of Management’s policy on dealing with fraud.
 - **Section 8** sets out the roles and responsibilities of staff in detecting and notifying fraud.
 - **Section 9** is the response plan that managers will follow where a fraud is reported.
 - **Section 10** discusses the resourcing options for any investigation.
 - **Section 11** advises on the pursuit of legal remedies, including option for recovery of any sums.

- **Appendix 1** sets out further guidance and reading in relation to the prevention of fraud.
- **Appendix 2** sets out the equality impact assessment.

6. Public Sector Values

6.1 High standards of corporate and personal conduct, based on the recognition that students come first, are a requirement, and these can be summarised as follows:

Accountability: Everything done by those who work in the College must be able to stand the tests of parliamentary scrutiny, judicial review, and public judgement on propriety and professional codes of conduct.

Probity: Absolute honesty and integrity should be exercised in dealing with students, assets, staff, suppliers and customers.

Openness: The College's activities should be sufficiently transparent to promote confidence between the College and its students, staff and the public.

All those who work in the College should be aware of and act in accordance with these values.

6.2 There are several Statutory frauds which exist and are defined by legislation, including the following:

- Criminal Justice and Licensing (Scotland) Act 2010 (conspiracy to commit fraud overseas)
- Companies Act 2006 (fraudulent trading and false and misleading financial statements)

- Insolvency Act 1986 (fraudulent trading and fraud in anticipation of winding up)
- Financial Services and Markets Act 2000 and the Financial Services Act 2012 (misleading statements and impressions in relation to investments and financial products)
- Consumer Protection from Unfair Trading Regulations 2008 (misleading commercial practices)
- Value Added Tax Act 1994 (fraudulent evasion of VAT)
- Custom and Excise Management Act 1979 (fraudulent evasions of duty)

6.3 The College is also committed to participating in the [National Fraud Initiative](#) (NFI) exercise carried out by Audit Scotland. The NFI is a counter-fraud exercise across the UK public sector which aims to prevent and detect fraud. The Cabinet Office oversees it and Audit Scotland leads the exercise in Scotland, working with a range of Scottish public bodies and external auditors. The NFI takes place every second year.

6.4 The NFI in Scotland is now well established and enables public bodies to use computer data matching techniques to detect fraud and error.

6.5 The NFI's key features as highlighted by Audit Scotland report are:

- Acts as a deterrent to potential fraudsters
- Identifies errors and fraud enabling appropriate action to be taken
- Operates across boundaries and public bodies in different sectors and countries
- Can provide assurances that systems are operating well
- Can identify where system improvements are required
- Represents value for money through centralised data processing and identifying targeted high-priority matches

6.6 Further information in relation to the NFI can be found at <http://www.audit-scotland.gov.uk/our-work/nationalfraud-initiative>

7. Board of Management Policy

- 7.1 The Board of Management is committed to maintaining an honest, open and well-intentioned atmosphere within the College. It is committed to the deterring, detection and investigation of any fraud within the College. The Public Interest Disclosure Act 1998 forms a key part of the Board of Management's policy.
- 7.2 In line with the Public Interest Disclosure Act 1998, the Board of Management wishes to encourage staff or public, having reasonable suspicion of fraud, to report the incident. It is College policy that no staff member should suffer in any way by reporting in good faith any reasonably held suspicions.
- 7.3 In Scots law fraud is mainly dealt with under common law. The main criminal offences are common law fraud, uttering (forged or counterfeited document) and embezzlement. There are also statutory offences which contain an element of fraud including for example: the Criminal Justice and Licensing (Scotland) Act 2010 (conspiracy to commit fraud overseas); Companies Act 2006 (fraudulent trading and false and misleading financial statements); Insolvency Act 1986 (fraudulent Trading and fraud in anticipation of winding up); Consumer Protection from Unfair Trading Regulations 2008 (misleading commercial practices); Value Added Tax Act 1994 (fraudulent evasion of VAT).
- 7.4 The term 'fraud' is used to describe such acts as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. For practical purposes fraud may be defined as the use of deception with the intention of obtaining an advantage, avoiding an obligation or causing loss to another party. The criminal act is the attempt to deceive and attempted fraud is therefore treated as seriously as accomplished fraud.

- 7.5 Computer fraud or Cyber Fraud is where information technology equipment has been used to manipulate programmes or data dishonestly (for example, by altering, substituting or destroying records, or creating spurious records), or where the use of an IT system was a material factor in the perpetration of fraud. Theft or fraudulent use of a computer time and resources, including unauthorised personal browsing on the internet, is included in this definition.
- 7.6 It is important that all staff are able to report their concerns without fear of reprisal or victimisation and are aware of the means to do so. The Public Interest Disclosure Act 1998 inserts provisions into the Employment Rights Act 1996, which provide protection for those who raise concerns that, in their reasonable belief, are made in the public interest and show that one of the following has taken, is taking, or is likely to take, place: criminal offences; breaches of any legal obligations; miscarriages of justice; danger to the health and safety of any individual; damage to the environment and/or the deliberate concealing of information about any of these matters.
- 7.7 In the first instance any suspicion of fraud, theft or other irregularity should be reported by the member of staff, as a matter of urgency, to their line manager. If reporting to the line manager would be inappropriate (for example because the line manager is potentially implicated in the suspected fraud, theft or other irregularity), the concerns should be reported to one the following persons:
- Head of Faculty (or equivalent)
 - Director of Finance
 - Vice Principal
 - Principal
 - Chair of Audit Committee
- 7.8 Every effort will be made to protect an informant's anonymity if requested. However, the College will always encourage individuals to be identified to add more validity to the accusation and allow further investigations to be more

effective. In certain circumstances, anonymity cannot be maintained. In these circumstances, the informant will be informed prior to release of information.

8. Roles and Responsibilities

8.1 The overall responsibility for the prevention and minimising of fraud rests with the Principal of the College. However all staff have a responsibility for the prevention, detection and reporting of fraud.

8.2 The Director of Finance has been nominated as the main point of contact for the reporting of any suspicion of fraud. In addition, responsibility for investigation of fraud/theft has been delegated to the Director of Finance. The Director of Finance shall be responsible for informing third parties such as the Scottish Further Education Funding Council, internal and external audit, of the police where appropriate. For incidents involving the Director of Finance, Vice Principals, the Principal and/or the Board of Management, the “nominated individual” shall be the Board of Management’s Chair of the Audit Committee. For incidents involving the Chair of the Audit Committee the “nominated individual” shall be the Chair of the Board of Management. For the purpose of the remainder of the Policy the nominated “Senior Manager” shall be deemed to be the Director of Finance or the Board of Management’s Chair of the Audit Committee as appropriate.

8.3 The nominated Senior Manager shall inform and consult the Principal (except in the case where such matter involves the Principal where he shall consult with the Board of Management’s Chair of Audit Committee) in all cases.

8.4 The Senior Manager may wish to obtain advice as to whether the matter should be investigated under the guidance set out in this Policy or under the College Disciplinary Procedure. The Director of Organisational Development and HR should be consulted in the first instance.

- 8.5 Where a member of staff is to be subject to an investigation for fraud under the College Disciplinary Procedure, which can be found on the College intranet, the Senior Manager shall consult and take advice from the Director of Organisational Development and HR.
- 8.6 The Director of Organisational Development and HR shall advise those involved in the investigation on matter of employment law and other procedural matters.
- 8.7 Where the incident is considered to be subject to either local or national controversy and publicity then the Principal, Board of Management and the Scottish Funding Council should be notified (in addition to the External Auditors) before the information is made public.
- 8.8 It is the responsibility of the Director of Finance to ensure that staff are aware of the above requirements and that appropriate reporting arrangements are in place.
- 8.9 It is the responsibility of all staff to safeguard the assets of the Board of Management. Assets include information and goodwill, as well as property. As such it is the responsibility of:

Line Managers

- Have an understanding of the fraud risks in their areas and to be aware of the processes which are under risk.
- Be diligent in their responsibilities as managers particularly in exercising their authority in authorising transactions such as timesheets, expense claims, purchase orders, returns and contracts.
- Deal effectively with issues raised by staff including taking the appropriate action in terms of this Policy to deal with reported or suspected fraudulent activity.

- Provide support/resource as required to fraud investigations.

All Staff

- To uphold the high legal, ethical and moral standards that are expected of all individuals connected to the College.
- Adhere to all the policies and procedures in safeguarding the College's assets.
- Alerting management should they suspect that there is or there is the possibility of fraud that exists.

8.10 It shall be necessary to categorise the irregularity prior to determining the appropriate course of action. Two main categories exist:

- Theft, burglary and isolated opportunity offences
- Fraud, corruption and other financial irregularities.

8.11 The former will be dealt with directly by the police, whilst the latter will be investigated and may be reported to the police in accordance with this Policy and also may require disclosure to the College's funding bodies.

9. Response Plan

Introduction

9.1 The following sections describe the Board of Management's response to a reported suspicion of fraud/theft. These procedures are designed to allow for evidence gathering and collation in a manner that will facilitate informed initial decisions, while ensuring that any evidence gathered will be admissible in any criminal or civil action. Each situation is different; therefore, the guidance must be considered carefully in relation to the specific circumstances of each case before action is taken.

9.2 Under no circumstances should a member of staff speak or write to representatives of the press, television, radio or to another third party (other than those external parties who are “prescribed persons” within the terms of the Public Interest Disclosure Act 1998), about a suspected fraud/theft, without the express authority of the Principal. Care needs to be taken that nothing is done that could give a rise to an action for defamation of character.

Reporting Fraud

9.3 The nominated Senior Manager shall be trained in the handling of concerns raised by staff. The nominated Senior Manager shall, whenever possible, respect any request for anonymity or confidentiality providing that in doing so, that is consistent with the overall aims and objectives of this Policy and the principles of natural justice.

9.4 All reported suspicions must be investigated as a matter of priority to prevent any further potential loss to the Board of Management.

9.5 The nominated Senior Manager shall maintain a log of reported suspicions. The log will document, with reason, the decision to take further action or to take no further action. To justify such decisions the nominated Senior Manager shall retain as necessary, confidential files of evidence gathered to arrive at a decision. These files will be securely held with limited access. The log will detail any actions taken and conclusions reached with appropriate cross-referencing to any file held. The log should be reviewed annually by the Internal Auditors, who will report to the Audit Committee on any significant matters.

9.6 The nominated Senior Manager should consider the need to inform the Board of Management, external audit and police of the reported incident. In doing so, the nominated Senior Manager should take cognisance of the following guidance:

- Suspected losses below £500 may be treated as below the delegated limit and any required action taken as appropriate by the Senior Manager.
- The Principal should be informed at the first opportunity in all cases of fraud.
- It is the duty of the nominated Senior Manager to notify the Board of Management immediately of all losses above the delegated limit where fraud/theft is suspected.
- If a criminal act is suspected, particularly fraud or corruption, it is essential that matters are progressed from the outset in accordance with this Policy. The police should be contacted before any overt action is taken which may alert suspects and precipitate the destruction or removal of evidence. This includes taking action to stop a loss or tighten controls only on advice of the police not to take such action.
- At the stage of contacting the police, the nominated Senior Manager should contact the Director of Organisational Development and HR to initiate, if appropriate, the suspension of the employee, with pay, pending an investigation.

Managing the Investigation

9.7 The nominated Senior Manager will appoint a manager to oversee the investigation. The circumstances of each case will dictate who will be involved and when.

9.8 The manager overseeing the investigation (referred to hereafter as the “Investigating Manager”) should initially:

- Initiate a “Diary of Events” to record the progress of the investigation.
- If possible, determine if it is a fraud investigation or another criminal investigation. If a criminal event is believed to have occurred, the police, external audit and the Chair of the Audit Committee should be informed,

if this has not already been done. The Chair of the Audit Committee should inform the Chair of the Board.

9.9 If a criminal offence is believed to have occurred, the Investigating Manager may consider it appropriate to wait until the conclusion of any criminal investigation and/or proceedings before determining whether to progress the internal investigation.

9.10 If it is determined by the Investigating Manager that a formal internal investigation should be carried out, the investigation should establish:

- The extent and scope of any potential loss.
- If the College Disciplinary Procedure should be invoked.
- The nature of the offence, if not yet established.
- What can be done to recover loss.
- What may need to be done to improve internal controls to prevent re-occurrence.

9.11 The outcome of the investigation will be the subject to a report. This will normally take the form of an Internal Audit Report to the Audit Committee. The Audit Committee will then report the outcome to the Board of Management.

9.12 Where the report suggests that a criminal act has occurred and notification to the police has not been made, it should now be made.

9.13 Where recovery of a loss to the Board of Management, arising from any act (criminal or non – criminal), is likely to require a civil action, the College should seek legal advice.

- 9.14 If a decision is taken to invoke the College's Disciplinary Procedure, the report of the investigation will be used during the formal disciplinary proceedings.
- 9.15 An employee(s) who is/are the subject of any investigation may be suspended with pay pending the outcome of any proceedings under the College Disciplinary Procedure.

Gathering Evidence

- 9.16 It is not possible for this procedure to cover all the complexities of gathering evidence. Each case must be treated according to the circumstances of the case, taking professional advice as necessary. The Investigating Manager should, at all times, seek to maximise the reliability of audit evidence.
- 9.17 If a witness to the event is prepared to give a written statement, it is best practice for an experienced member of staff, preferably from the Human Resources Department, to take a chronological record using the witness's own words. The witness should sign the statement only if satisfied that it is a true record of his or her own words.
- 9.18 At all stages of the investigation any discussions or interviews should be documented and, where possible, agreed with the interviewee.
- 9.19 Physical evidence should be identified and gathered in a secure place at the earliest opportunity. An inventory should be drawn up by the Investigation Manager and held with the evidence. Wherever possible, replacement or new documents should be introduced to prevent access to the evidence. If evidence consists of several items, for example a number of documents, each one should be tagged with a reference number corresponding to the written record.

Interview Procedures

9.20 The Investigating Manager should, wherever possible, attempt to gather documentary and third party evidence for the purposes of the report. If an employee wishes to make a statement, it should be signed and dated, and include the following:

“I make this statement of my own free will; I understand that I need not say anything unless I wish to do so and that what I say may be given in evidence.”

9.21 Informal contact with the police should be made at an early stage in any investigation to ensure that no actions are taken that could prejudice any future criminal case through the admissibility of evidence.

Reporting process

9.22 Throughout any investigation, the Investigating Manager will keep the Principal, Director of Finance and Director of Organisational Development and HR informed of progress and any developments. If the investigation is long or complex, interim reports to the Audit Committee will be made. These reports may be verbal or in writing and may be in the form of an Internal Audit report.

9.23 On completion of the investigation the Investigating Manager will prepare a full written report setting out:

- Background as to how the investigation arose.
- What action was taken in response to the allegations.
- The conduct of the investigation.
- The facts that come to light and the evidence in support.
- Action taken against any party where the allegations were proved.
- Action taken to recover any losses.

- Recommendations and/or action taken by management to reduce further exposure and to minimise any recurrence.

Disclosure of Loss from Fraud

- 9.24 A copy of the fraud report, for those above the £500 threshold, in appropriate format must be submitted to the Scottish Funding Council. Internal and External Auditors should also be notified of any loss. The register of losses and condemnations submitted annually to the Audit Committee should include any loss with appropriate description.
- 9.25 Management must take account of the permitted limits on writing off losses that require formal approval as stipulated in the College Financial Regulations.

Police Involvement

- 9.26 It shall be the policy of the Board of Management that wherever a criminal act is suspected the matter will be immediately notified to the police.
- 9.27 The nominated Senior Manager will decide at what stage the police are contacted.
- 9.28 The nominated Senior Manager and Investigating Manager should informally notify police of potential criminal acts, to seek advice on the handling of each investigation at an early stage in the investigation.

Press Release

- 9.29 In the event that there may be potentially damaging publicity to the College and/or to the suspect, the Board of Management's Chair, on behalf of the Board of Management, should prepare, at an early stage, a press release giving the facts of any suspected occurrence and any actions taken to date. For example, suspension, although the name of the staff member suspended pending investigations should not be released to the press.

10. Resourcing of Investigation

10.1 The nominated Senior Manager will determine the type and level of resource to be used in investigating suspected fraud. The choices available will include:

- Internal staff from within the College
- Director of Organisational Development and HR
- External / Internal Audit
- Specialist Consultant
- Police

10.2 In making a decision, the nominated Senior Manager should consider independence knowledge of organisation, cost, availability and the need for a speedy investigation. Any decisions must be shown in the Log held by the Nominated Senior Manager. A decision to take “no action” will not normally be an acceptable option except in exceptional circumstances.

10.3 In any case involving a suspected criminal act, it is anticipated that police involvement will be in addition to an alternative resource.

11. Risk Assessment / Training

11.1 The College will undertake an annual fraud risk review for consideration by senior management which will aim to identify and address potential fraud risks. Any training needs identified as part of this review will be undertaken as a matter of urgency.

12. The Law and its Remedies

Criminal Law

12.1 The Board of Management shall refer all incidences of suspected fraudulent acts over the £500 threshold or criminal acts to the police for decision by the Procurator Fiscal as to any prosecution.

Civil Law

- 12.2 The Board of Management shall refer all incidences of loss through proven fraudulent or criminal act to their legal representatives to determine whether the loss can be recovered by civil action.

13. Effective Date of Policy

- 13.1 This Policy is effective from 8 September 2021 and supersedes all previous policies related to Anti-Fraud and Corruption. This Policy will be reviewed whenever changes affect it, or in 2 years, whichever is the earlier.

APPENDIX 1 - FURTHER GUIDANCE ON FRAUD

Further information relevant to implementing this Policy can be found in the following:

[NHS Counter fraud guidance](#)

[National Audit Office - Good practice guidance: Fraud and Error](#)

[CIPFA Code of Practice for counter fraud](#)

[National Fraud Initiative](#)

[Scottish Government Counter Fraud Policy](#)

[Scottish Public Finance Manual](#)

APPENDIX 2 - EQUALITY IMPACT ASSESSMENT

Name of policy/procedure/decision:

Fraud and Corruption Policy

Provide a brief summary of the aims of the policy/procedure/decision and main activities:

This Policy sets out the Board of Management's response plan for detected or suspected fraud. It provides guidance to all staff on the action, which should and will be taken when fraud, theft or corruption is suspected.

Assessed By: Clare Fraser

Date: 16 September 2021

This stage establishes whether a policy, procedure or decision will have a differential impact from an equality perspective on people who share protected characteristics or whether it is "equality neutral" (i.e. have no effect either positive or negative).

The protected characteristics are: age, disability, gender reassignment, pregnancy or maternity, race, religion or belief, sex and sexual orientation.

1. Who will benefit from this (students/staff/stakeholders)? Is there likely to be a positive impact on people who share protected characteristics, and if so, how? Or is it clear at this stage that it will be equality "neutral"? i.e. will not have a differential impact on any equality group/s?

This Policy is not directly relevant to the College's duty to advance equality, eliminate discrimination and promote good relations. It is not anticipated that any differential impact will occur.

2. Is there likely to be an adverse impact on people who share protected characteristics? If so, who may be affected and why? Or is it clear at this stage that it will be equality "neutral"?

This Policy will have a neutral impact on people who share protected characteristics.

3. What action will you take to ensure that you are monitoring the impact of this Policy?

This Policy will be monitored indirectly through data collected with regards to the Disciplinary Policy and Procedure.