



COUNTER FRAUD POLICY AND FRAUD RESPONSE PROCESS

Date	Purpose of Issue/Description of Change	Equality Impact Assessment Undertaken
	Initial Issue	

Policy Officer	Senior Responsible Officer	Approved By	Date
Deputy Chief Financial Officer	Chief Financial Officer	Executive Board	29 October 2025

This Policy will be reviewed at least every 3 years

Counter Fraud Policy

1. Policy Statement

Bangor University is committed to the highest standards of honesty, integrity, and accountability. Fraud is wholly unacceptable and will not be tolerated under any circumstances. The University is committed to preventing, detecting, and responding robustly to any instance of fraud affecting its operations, staff, students, or reputation.

2. Scope

This policy applies to:

- Staff
- Students
- Contractors, suppliers, and third-party partners
- Members of Council
- Any other individuals representing or acting on behalf of the University

Fraud involves the use of deception to obtain an unjust or illegal advantage, including but not limited to:

- Theft or misuse of University funds or assets
- Falsifying records or documents
- Claiming for work not performed or time not worked
- Procurement fraud
- Admissions or examination fraud
- Bribery
- Digital fraud such as manipulating programs or data
- False accounting
- Collusion

3. Responsibilities

3.1 Council and the Executive Board

- Ensure a culture of integrity and ethical behaviour
- Provide strategic direction and resources to manage fraud risk
- Oversee effective systems of internal control and governance

3.2 Staff with leadership responsibilities

- Act honestly and with integrity
- Act to ensure compliance with regulations and controls
- Be alert to identify risks and highlight these to relevant teams.

3.3 University Staff

- Act honestly and with integrity
- Be alert to the possibility of fraud or corruption
- Report concerns in accordance with this policy

3.4 Internal Audit and Finance Team

- Investigate suspected fraud
- Report findings to Audit and Risk Committee and relevant authorities

3.5 Students and Third Parties

- Abide by University policies and codes of conduct
- Report suspicions of fraud through appropriate channels

4. Prevention and Detection

The University will:

- Maintain robust financial controls and procedures
- Conduct risk assessments and regular reviews
- Conduct regular audits and reviews
- Provide training and awareness to staff
- Access suppliers and contractors thoroughly
- Promote a culture of transparency and accountability

Fraud Response Procedure

5. Reporting Fraud

Suspected fraud must be reported promptly. Reports can be made through:

- The Chief Financial Officer
- The Vice-Chancellor, if a report is about the Chief Financial Officer
- The Chair of Council, if a report is about the Vice-Chancellor
- The Chair of Audit Committee, if a report is about the Chair of Council
- The University Secretary, if a report is being made under the University's Public Interest Disclosure Policy [https://my.bangor.ac.uk/legal-and-compliance/documents/Public Interest Disclosure Whistleblowing V5.pdf](https://my.bangor.ac.uk/legal-and-compliance/documents/Public%20Interest%20Disclosure%20Whistleblowing%20V5.pdf)

All reports will be treated seriously and investigated promptly and confidentially. Any individual subject to a fraud investigation will be treated with fairness and dignity throughout the process. Allegations will be handled confidentially, investigations conducted impartially, and no action taken without the individual having a reasonable opportunity to respond. Interim measures will be proportionate and not punitive. All

individuals retain the right to representation, appeal, and support, and will be protected from retaliation where allegations are found to be unsubstantiated.

6. Investigation and Disciplinary Action

Investigations will follow a fair and consistent process:

- Acknowledge receipt to the reported (unless anonymous)
- Initial assessment by an appropriate designated officer
- Full investigation if warranted, normally carried out by the Internal Auditors.
- Disciplinary action if fraud is confirmed, up to and including dismissal
- Referral to police or regulatory authorities where criminal activity is suspected

7. Investigation Process

The remit of the investigation will be:

1. **Fact Gathering:** review documents, logs, and transactions.
2. **Interviews:** conduct staff/witness interviews following HR/legal guidance.
3. **Analysis:** forensic accounting, data review, pattern detection.
4. **Findings:** prepare a formal investigation report with conclusions and recommendations.
5. **Recommendations:** control improvements, disciplinary actions, recovery steps.

Investigations will be timely, objective, and proportionate.

8. Recovery of Losses

Where fraud results in financial loss, the University will pursue all avenues to recover funds, including civil action and insurance claims where applicable.

9. Reporting to Audit & Risk Committee

The Chief Financial Officer is responsible for reporting to the Audit & Risk Committee:

Immediate notification (within 48–72 hours):

- Brief Chair on nature of allegation, estimated exposure, containment actions, Investigating Officer appointed, and proposed timeline.
- The Vice-Chancellor, Chair of Council and Chair of Finance Committee will also be informed.
- The need to report to Medr and the Charity Commission will also be considered.

Interim update:

- Weekly or as agreed, summarising progress, preliminary findings, estimated losses, and containment measures.

Final report:

- Full investigation report (redacted as necessary), quantified losses, recovery outcomes, disciplinary or legal actions, and remedial action plan with owners and deadlines. The final report will be presented to the Executive Board in advance of the Audit and Risk Committee.

10. Monitoring and Review

This policy and procedure will be reviewed every three years or in response to significant changes in legal or regulatory requirements. The effectiveness of the policy will be monitored through audit results, incident reports, and stakeholder feedback.

Approved by: Executive Board

Date: 29/10/2025

Next Review Date: [Insert Date]