

Anti-Fraud and Corruption Policy

For the attention of: All Staff, Students, Governors, Contractors,
Volunteers, Associated Persons and
partner organisations

Produced by: CEO and Group Principal

Approved by: Board of Governors

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Date of next review: October 2027





Vision, Purpose & Values

Our Vision

Our students will be recognised locally & nationally for their positive impact on the communities and industries in which they choose to work.

Our Purpose

To inspire our students to gain the skills, knowledge and behaviours they need to be resilient and thrive in an ever-changing world.

Our Values

Excellence: A culture of creativity, high expectations, ambition and aspiration

Respect: Showing fairness, courtesy and mutual respect to each other and our environment

Integrity: Honesty, openness and trust at the heart of College life

Diversity: Celebrating diversity and inclusivity as a key to our success

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1. Background

The Windsor Forest Colleges Group (WFCG) is committed to the highest standards of integrity, honesty and accountability in all its operations. The Group has a zero-tolerance approach to fraud, bribery and corruption.

WFCG will take all reasonable steps to prevent such activities and respond promptly and effectively to any suspected or actual instances.

This policy supports WFCG's values of trust, openness and responsibility, helping to protect the organisation's assets, reputation and the interests of students, staff, partners and the wider community.

2. Purpose

The purpose of this policy is to:

- Define what constitutes fraud, bribery and corruption within WFCG.
- Outline WFCG's commitment to preventing and detecting these activities.
- Set out clear responsibilities, authority levels and reporting procedures in the event of suspected or actual fraud, bribery, or corruption.
- Ensure compliance with relevant legislation, including:
 - o The Fraud Act 2006
 - o The Bribery Act 2010
 - o The Economic Crime and Corporate Transparency Act 2023 (ECCTA 2023), including the new corporate offence of failure to prevent fraud.

3. Scope

This policy applies to:

- All employees, including temporary and agency staff.
- All students, including apprentices and those studying remotely.
- All governors, volunteers, and contractors.
- All associated persons acting on behalf of WFCG, such as consultants, agents, intermediaries, subsidiaries, and partner organisations.

4. Policy Statement

WFCG will:

- Promote a culture where fraud, bribery and corruption are never acceptable.

- Demonstrate clear leadership and top level commitment through the Executive Team and Corporation Board.
- Maintain clear systems of internal control and accountability.
- Provide effective mechanisms for reporting, investigating, and managing fraud-related issues.
- Undertake regular fraud risk assessments and provide proportionate training.
- Ensure compliance with all legislative and regulatory requirements.

5. Responsibilities

5.1. Corporation Members (Governors)

Governors have overall responsibility for ensuring WFCG maintains effective systems to prevent and detect fraud, bribery and corruption. They ensure WFCG has reasonable prevention procedures in line with ECCTA 2023.

5.2. Chief Executive Officer (Group Principal)

The CEO, as Accounting Officer, holds ultimate responsibility for ensuring this policy is implemented effectively. The CEO will:

- Develop and maintain appropriate systems of internal control.
- Ensure the Executive Team acts as the Fraud Response Group.
- Report serious cases to the Corporation Chair, Audit Committee Chair and external authorities where required.

5.3. Executive Team and Managers

Managers are responsible for:

- Understanding and monitoring risks of fraud and corruption in their area.
- Ensuring compliance with internal controls.
- Communicating this policy and related procedures to staff and students.
- Reporting suspicions without delay using the procedures in Appendix 1.

5.4. Staff and Students

Everyone must:

- Act with honesty and integrity.
- Report suspected or actual fraud, bribery, or corruption immediately.
- Cooperate fully with any investigations.

6. Governance and Oversight

The Audit Committee will receive reports of suspected or proven fraud and oversee the effectiveness of prevention measures. Internal Audit will support investigations, review systems, and ensure measures are in place to minimise recurrence.

7. Non-compliance

WFCG will investigate all instances of actual, attempted, and suspected fraud and corruption. Individuals found to have engaged in such activity will be subject to disciplinary action and where appropriate, referred to the Police, Serious Fraud Office, or other relevant authorities.

8. Review

This policy will be reviewed annually by the Audit Committee or sooner if required by legislation or organisational change.

Next Review Due: October 2026.

Appendix 1 – Reporting Procedures

How to Report Suspected or Actual Fraud, Bribery, or Corruption

- Students should report concerns to the Safeguarding Team, who will liaise with the Group Finance Director
- Staff should report academic fraud using the Plagiarism Policy procedures.
- Identity or financial fraud should be reported to the Group Finance Director, who may convene an Executive Team (Fraud Response Group) meeting.
- All other fraud, bribery, or corruption should be reported to either:
 - o The Group Finance Director, or
 - o The Vice Principal Curriculum and Quality.

If the matter involves senior staff or if the reporter feels unable to use these channels, they may report under the Whistleblowing Policy.

Referral to External Agencies

- The Group Principal/CEO will decide when to report cases to the Police, Serious Fraud Office, DfE, or OfS.
- The Accounting Officer must report serious fraud or theft to the Charity Commission where required.

Appendix 2 – Fraud Prevention and Investigation Procedures

1. Prevention of Further Loss

Where there are reasonable grounds for suspicion, the Executive Team will take immediate steps to prevent further loss. This may include suspension (with or without pay) in line with the Staff Disciplinary Policy.

2. Securing Evidence

All evidence must be secured promptly. Access to WFCG property and IT systems may be restricted to protect data integrity.

3. Role of Internal Audit

Internal Audit will:

- Review related systems to identify weaknesses.
- Ensure compliance with evidential standards.
- Provide advice and guidance to the Fraud Response Group.

4. Recovery of Losses

The Group Finance Director will ensure losses are quantified and recovery sought through repayment, legal action, or asset freezing where necessary.

5. Reporting to Governors

The CEO/Accounting Officer will report serious cases to the Corporation Chair and Audit Committee Chair. Progress reports will include:

- The nature and value of the loss.
- Actions taken.
- Measures to prevent recurrence.

Appendix 3 – Definitions

Fraud – Dishonest conduct intended to make a gain or cause loss, including false representation, failing to disclose information, or abuse of position.

Bribery – Offering or accepting an inducement to gain an unfair advantage.

Corruption – Misuse of power for personal gain.

Embezzlement – Secretly taking money belonging to an organisation for personal use.

Facilitation Payment – A payment made to speed up a routine action by an official (prohibited under the Bribery Act 2010).

Intermediary – A person or organisation arranging business between parties who do not deal directly.

Subsidiary – A company owned or controlled by another company.

False Accounting – Deliberately altering or misrepresenting financial records.

Deception – Concealing the truth to gain an advantage.

Related Policies and Documents

- Financial Regulations
- Whistleblowing Policy
- Plagiarism Policy
- IT Usage Policy
- Staff and Student Disciplinary Policies
- Bribery Act 2010
- Economic Crime and Corporate Transparency Act 2023