

# Counter Fraud Strategy

*Excellence • Integrity*

### **Our Mission**

Raising Aspirations, Unlocking Potential, Advancing Futures

### **Our Values**

Excellence, Passion, Team Work, Integrity, Innovation,  
Sustainability, Valuing Others and Supportiveness

### **Sparsholt College Group**

The Sparsholt College Group (the College Group) includes Sparsholt College, Andover College, University Centre Sparsholt, Sparsholt College Services, Westley Enterprises and Andover Town Football Club. College Group policies apply to each part of the group unless specified otherwise.

This Counter Fraud Strategy was approved by the Board of Governors in March 2023 and supersedes previous editions.

Originator:	Director of Finance
Located:	College websites College Group intranet
Due for review:	February for March 2026

## COUNTER FRAUD STRATEGY

This document sets out the College Group's strategy in relation to fraud and corruption. The College Group takes its responsibilities for the stewardship of public finances very seriously and is committed to the highest standards of transparency and accountability in order to ensure appropriate use of public funds and assets. It has a duty to prevent fraud and corruption, whether it is attempted by someone within or outside of the College Group, such as another organisation, an employee, a student, a volunteer or contractor.

The College Group is committed to creating and maintaining an effective anti-fraud and corruption culture, by promoting high ethical standards and encouraging the prevention and detection of fraudulent activities.

In all its dealings, the College Group will adhere to the seven principles of public life set out in the Nolan Committee's report on *Standards in Public Life: Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty and Leadership*.

The College Group will not tolerate fraud or corruption and will take all necessary steps to investigate all allegations of fraud or corruption and pursue sanctions available in each case, including removal from office, dismissal, prosecution and recovery of losses through both civil and criminal means.

Our strategy is based upon three key principles: Acknowledge; Prevent; and Pursue. We will take steps to:

- assess and understand the fraud risks (acknowledge);
- Communicate and promote an effective anti-fraud culture and implement appropriate and robust internal controls and security measures (prevent);
- take appropriate action in response to suspected fraud, including legal action where appropriate (pursue).

## Policies and Procedures

The College Group has in place a number of policies and procedures that are relevant to this strategy and, amongst other things, set out expected standards of behaviour and how to respond to suspected fraud or irregularities.

An overview of the key relevant policies and procedures is as follows:

<b>Strategy</b>	
Counter Fraud Strategy	
<p><b>Culture</b></p> <p>Audit Committee - Terms of Reference</p> <p>AoC Code of Good Governance for English Colleges</p> <p>Code of Conduct for Governors</p> <p>Data Protection Policy</p> <p>Financial Regulations (incorporating counter fraud and irregularity, gratuities and gifts, bribery, conflicts of interest)</p> <p>Freedom of Information Publication Scheme</p> <p>Recruitment Policy (Staff)</p> <p>Resources Committee – Terms of Reference</p> <p>Staff Charter and Code of Conduct</p> <p>Student Charters</p> <p>Student Code of Conduct</p>	<p><b>Detection</b></p> <p>Complaints (and other Feedback) Policies &amp; Guidelines</p> <p>Counter Fraud and Irregularity (Financial Regulations)</p> <p>Duty to Act (Whistleblowing) Policy and Procedure</p>
<p><b>Prevention</b></p> <p>Expenses Policy and Guideline</p> <p>Financial Regulations (incorporating counter fraud and irregularity, gratuities and gifts, bribery, conflicts of interest)</p> <p>Procurement Policy</p> <p>Conflicts of Interest Policy - Academic</p>	<p><b>Investigation &amp; Reporting</b></p> <p>Complaints (and other Feedback) Policies &amp; Guidelines</p> <p>Counter Fraud and Irregularity (Financial Regulations)</p> <p>Disciplinary Policy and Procedure</p> <p>Whistleblowing (Duty to Act Policy and Procedure)</p>

## Key Actions

As part of this strategy, the college will ensure the following actions are taken:

Aim	Actions	Frequency	Person or Committee Responsible
Commitment to counter fraud and culture of zero tolerance in relation to fraud and corruption.	Review and approval of Counter Fraud Strategy.	Every three years	Governors / SLT
	Review and update the policies and procedures, which are relevant to this strategy.	As detailed in each policy & procedure	Governors / SLT
	Raise awareness of counter fraud strategy through: Staff Induction Email to managers and staff Training	As required Annual Annual	HR Manager Director of Finance Director of Finance
Identify vulnerable areas in relation to fraud and corruption	Establish and maintain a fraud risk register identifying high-risk areas.	Annual review	SLT / Director of Finance
	Review internal and external audit findings.	On publication of internal and external audit reports	Audit Committee / Relevant SLT member
	Promptly investigate allegations of fraud and irregularities.	As required.	In line with the relevant policy / procedure.
Prevent fraud through the use of appropriate and robust internal controls.	Review and update, as appropriate, the finance regulations, procurement policy and expenses policy.	As detailed in each policy & procedure	Governors / SLT
	Approve an internal audit strategy and annual audit plan, which incorporates audits of key areas and the associated internal controls.	Annually	Governors
Recover losses resulting from fraud or irregularities.	In proven cases apply appropriate sanctions and take steps recover money or assets.	As required.	SLT