



University of
St Andrews

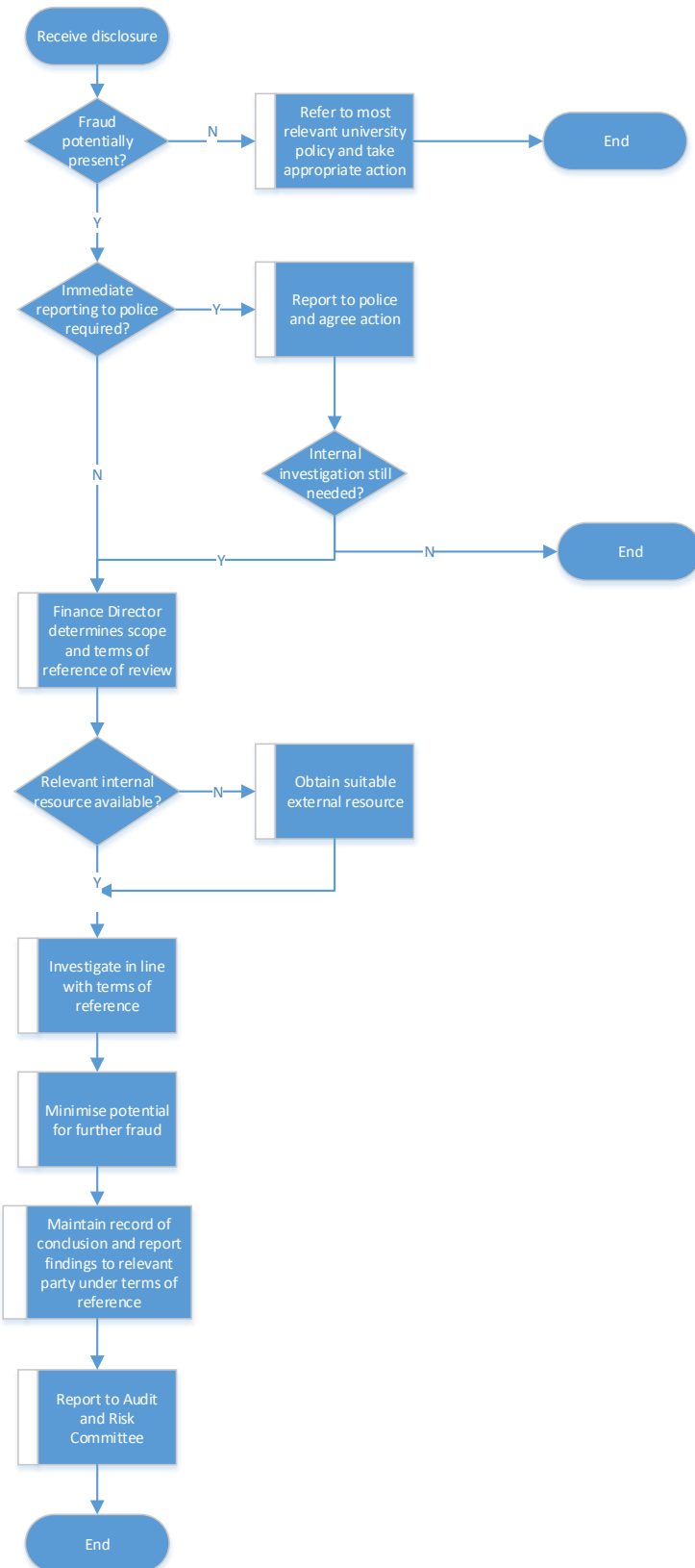
Fraud response

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| Purpose | To set out the steps required to be taken when a report is made to the University that alleges that fraud or financial irregularity has occurred. |

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1. Flowchart Overview



2. Objective of Process

The objective of this process is to set out the steps required to be taken when a report is made to the University that alleges that fraud or financial irregularity has occurred. It includes summarised instructions about what to do, and who to contact/notify, should any fraud-related concerns arise.

3. Background Information

The University is committed to the proper use of funds, both public and private. As a consequence, it is essential that everyone associated with the University - including staff, students, employees, contractors and third-parties - are aware of the risk of fraud, corruption, theft and other activities involving dishonesty, in all its forms. The University aims to reduce instances of fraud to a practical minimum - and to also put in place arrangements that hold any fraud to a minimum level on an ongoing basis. The University's approach to counter-fraud will be comprehensive, cost-effective and professional, using specialist expertise if, as and when required.

It may be helpful to include a **definition of fraud** here – being “the use of deception with the intention of obtaining personal gain, avoiding an obligation or causing loss to another party”. A financial irregularity refers to the intentional misstatement or omission of significant information in accounting records, financial statements, other reports, documents or records.

4. Dependencies

A person wishing to use this procedure should also understand the following related policies: -

- 4.1 [Whistleblowing policy](#)
- 4.2 [Anti-Bribery policy](#)
- 4.3 [Disciplinary policy](#)
- 4.4 [Student non-academic misconduct](#)
- 4.5 [Anti-money laundering](#)
- 4.6 [Criminal Finance Act](#)

5. Detailed Procedure Notes

5.1 Disclosure received with fraud/ irregularity potentially present

Whenever any matter arises which involves, or is thought to involve, irregularities or fraud concerning cash, stores or other property of the University or any other suspected irregularity in the exercise of the activities of the University, this matter should be reported immediately to the Chief Financial Officer or the Convenor of the Audit Committee.

It is the responsibility of all members of the University to report fraud or irregularities whenever they are detected or suspected of being detected. Instances of fraud may be external or internal.

It is not necessary to provide, or wait for, “proof” of the particular type of malpractice. The disclosure should contain as much detail as possible of the grounds for concern, including the names of individuals and significant dates, locations or events, where applicable.

The individual should make the disclosure orally, in writing, or by e-mail to the Chief Financial Officer findir@st-andrews.ac.uk. If the individual does not wish to report to the Chief Financial Officer, then the primary appropriate person (the University’s Whistleblowing Officer) is the Convener of the Audit & Risk Committee of the University Court. Letters may be sent to the Convener (marked “For Forwarding without Opening” and “Strictly Private & Confidential”) at the Court Office, College Gate, North Street, St Andrews, Fife KY16 9AJ, UK. The convener may also be directly contacted by email through a special account with the address whistleblowing@st-andrews.ac.uk

5.2 Initial consideration

The Chief Financial Officer, in consultation with the Convenor of the Audit & Risk Committee and/or Vice-Principal (Governance & Planning) as appropriate, will consider the information made available, and will then decide on the form of action/investigation to be undertaken. They may determine that it is more appropriate to investigate the issue under the terms of other more appropriate University policies, such as those covering grievance and disciplinary matters in which case the processes described in the other policy shall apply.

5.3 Investigation of disclosures made

If it is decided by the Chief Financial Officer that the disclosure needs to be investigated, then he/she must decide on the form of investigation to be undertaken. These include:

- a. Internal investigation/inquiry led within the University.
- b. External (independent) investigation/inquiry led outside the University.
- c. Referral to the police.

Where no further investigation is warranted, this will be referenced in the annual report on whistleblowing to the Audit and Risk Committee.

Consideration of whether the investigation should be carried out internally, externally and/or reported to the police should take into account: -

- The amount of money involved/at risk
- The technical complexities involved in performing the review – e.g. systems knowledge or specialist procedural knowledge
- The sensitivity to the University
- Any existing legislation – e.g. money laundering reports should go to the Money Laundering Reporting Officer
- Any potential link to organised crime or terrorism

Where the issue relates to a computer security incident this should be referred to StACSIRT (St Andrews Computer Security Incident Response Team) [IT security team \(CSIRTs\)](#). StACSIRT will then be responsible for informing relevant authorities e.g. police/ national fraud organisations and for updating the University Audit and Risk Committee.

Where the issue is to be the subject of an internal investigation, this will normally be conducted through the University's Disciplinary Procedures or Non-Academic Misconduct Policy (Students). Fraud will normally be treated as gross misconduct.

Appropriate steps should be taken at the earliest stage to minimise any further fraud exposure and protect evidence of potential fraud.

5.4 Reporting of the outcome

The University, as part of its governance process, will maintain a full record of all disclosures and reports together with subsequent investigations, conclusions and actions.

In all cases, a report of the outcomes of any investigation will be made to the Audit and Risk Committee, in detail where the issue falls within its purview, and in summary in other cases. This allows the Committee to monitor the effectiveness of the procedure. Additionally, the Audit and Risk Committee will receive an annual overall summary report on whistle-blowing.

| Version number | Purpose / changes | Document status | Author of changes, role and school / unit | Date |
|----------------|--------------------------|-----------------|---|------------|
| 1 | Update to current format | Approved | Wendy Macfarlane | 04/04/2018 |
| 1.1 | Include role of StACSIRT | Approved | Wendy Macfarlane | 22/06/2020 |
| 1.2 | Update link to StACSIRT | Approved | Wendy Macfarlane | 30/08/2021 |