



# Commonwealth Scholarship Commission in the UK

## COMMONWEALTH SCHOLARSHIP COMMISSION IN THE UNITED KINGDOM

### Anti-Fraud, Bribery and Corruption Policy

#### 1. Policy

- 1.1. This policy relates to the activities of the Commonwealth Scholarship Commission (CSC), its members, members of the CSC Secretariat, any other organisation contracted to provide specific administrative or other services on the CSC's behalf, over which it can reasonably be expected to have control (hereafter referred to as 'CSC delivery partners'), and CSC Scholars, Fellows and Alumni in so far as their actions are related to the CSC, subject to the qualifications below.
- 1.2. This Anti-Fraud, Bribery and Corruption Policy sets out the standards that must be met by the CSC, Scholars, Fellows and Alumni and the CSC's delivery partners in order to ensure individuals comply with the UK Anti-Bribery Act 2010 and Fraud Act 2006. It sets out the standards that must be met and clarifies the actions that individuals need to make with regards to actual or perceived fraud, bribery or corruption.
- 1.3. This policy relates to fraud, bribery and corruption. References to fraud refer also to acts of bribery and corruption.
- 1.4. Complaints unrelated to fraud, bribery or corruption should be submitted using the CSC's Complaints Policy.

#### 2. Definitions

- 2.1. The term fraud is commonly used to describe the use of deception to deprive, disadvantage or cause loss to another person or party; or secure unwarranted personal gain. An example of fraud would be to submit false qualifications or other achievements with a scholarship application, or for a scholar on award not to inform the CSC of travel plans which may affect their stipend payments, or for a scholar to fail to repay advances of stipend or payments an individual is not otherwise entitled to.
- 2.2. The term bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage. An example of bribery would be for a candidate to offer money to a nominating agency in order to be nominated for a scholarship, or for a scholar to offer a gift to a CSC staff member in order to have their award extended.
- 2.3. The term corruption is broadly defined as the abuse of entrusted power for personal gain. An example of corruption would be for an employee of a nominating agency to offer to nominate a candidate in return for a gift, or for an employee of the CSC to withhold payments to scholars for personal gain.

### **3. Principles**

- 3.1. The CSC is committed to the prevention of fraud, bribery and corruption and the promotion of an anti-fraud culture.
- 3.2. The CSC operates a zero-tolerance attitude to fraud, bribery and corruption and requires Commissioners, members of the Secretariat staff, nominating agencies, members of selection committees, applicants, Scholars, Fellows, Alumni and delivery partners to act honestly and with integrity at all times, and to report all reasonable suspicions of fraud, bribery or corruption.

### **4. Government Functional Standard (GovS 013)**

In line with guidance set out in the Government Functional Standard (GovS 013) the Commission has the following in place:

- 4.1. The Chair of the Commission as the Accounting Officer is the officer responsible at Board level for Counter-Fraud, Bribery and Corruption. The Secretariat has appointed a Counter Fraud Champion and a Senior Lead with responsibility to ensure that robust practices are in place around Fraud, Bribery and Corruption.
- 4.2. The CSC has a counter fraud, bribery and corruption strategy in the form of its 'Counter Aid Diversion Strategy' and an annual action plan that summarises key actions to improve capability, activity and resilience in that year which is reviewed by the Audit and Risk Management Committee at each meeting.
- 4.3. The CSC has undertaken a fraud, bribery and corruption risk assessment
- 4.4. The CSC has a policy and response plan in place for dealing with potential instances of fraud, bribery and corruption (the procedure within this document)
- 4.5. The CSC has well established and documented reporting routes for staff, contractors and members of the public to report suspicions of fraud, bribery and corruption and a mechanism for recording these referrals and allegations. The CSC policy is shared with Scholars, Fellows and delivery partners and made available on its own website along with a specific e-mail address for reporting any suspected instances of fraud, bribery or corruption.
- 4.6. The CSC ensures all staff have access to and undertake fraud awareness, bribery and corruption training as appropriate to their role.
- 4.7. The CSC has a mechanism in place to report identified loss from fraud, bribery, corruption and error, and associated recoveries, to the FCDO in line with the agreed government definitions.
- 4.8. The CSC has agreed access to trained investigators that meet the agreed public sector skill standard through the specialist fraud investigation team within the FCDO.
- 4.9. The CSC has policies and registers for gifts, hospitality and conflicts of interest.

4.10. The CSC, its delivery partners and/or FCDO will investigate all instances of actual, attempted and suspected fraud committed by the above-named bodies and individuals and will where appropriate seek to recover funds lost to the Commission through fraud, bribery or corruption.

## 5. Reporting Suspicions

- 5.1. Where a suspicion of fraud is against a CSC delivery partner (including a nominating agency, contracted travel or finance provider, or the British Council), the suspicion should be raised in the first instance with the organisation concerned, according to their organisation's anti-fraud policy.
- 5.2. Where the suspicion is about the CSC, a Scholar or Fellow, or a CSC delivery partner but it would not be appropriate to address the suspicion with the partner directly, or an unsatisfactory response has been given when the suspicions were raised directly, the suspicions, with all necessary evidence should be presented in writing to the CSC addressed to the Head of CSC (or the Executive Secretary only if the suspicion is regarding the Head of CSC), either by email to [fraud@cscuk.org.uk](mailto:fraud@cscuk.org.uk) or by post to Commonwealth Scholarship Commission, Woburn House, 20-24 Tavistock Square, London, WC1H 9HF, United Kingdom.
- 5.3. Where it would not be appropriate to address the suspicion with the CSC, or an unsatisfactory response has been given when the suspicions were raised directly with the CSC, a report should be submitted to the FCDO Internal Audit and Investigations Directorate (IAID) by email at [reportingconcerns@fcdo.gov.uk](mailto:reportingconcerns@fcdo.gov.uk) or by calling the confidential hotline on +44 (0)1355 843747 or by writing to the Head of Internal Audit, Internal Audit and Investigations Directorate, 22 Whitehall, London, SW1A 2EJ, United Kingdom. The Public Interest Disclosure Act 1998 and the CSC Public Whistleblowing Policy and Procedure protect employees who raise concerns about certain matters of public interest in good faith. The CSC will take all reasonable steps to ensure that confidentiality is maintained in such cases, and that those making allegations are not disadvantaged in any way by doing so. The CSC upholds this through the CSC Whistleblowing Policy and Procedure.
- 5.4. In addition, free independent advice can be obtained from the charity, Protect, (formerly known as Public Concern at Work) on 020 3117 2520 (<https://protect-advice.org.uk/>)

# COMMONWEALTH SCHOLARSHIP COMMISSION IN THE UNITED KINGDOM

## Anti-Fraud, Bribery and Corruption Procedure

### 1. Responsibilities

1.1 The CSC Audit and Risk Management (ARM) Committee is responsible for:

- (a) regularly reviewing its anti-fraud policy and procedure to ensure it remains effective and relevant; and
- (b) ensuring the CSC has processes in place to investigate all allegations of fraud and to pursue appropriate action, including legal action.

1.2 The CSC Secretariat is responsible for:

- (a) developing, implementing and maintaining adequate systems of internal control to prevent and detect fraud, corruption and bribery;
- (b) ensuring that the CSC and FCDO's reputation and assets are protected against fraud;
- (c) reporting to the ARM Committee on all aspects of fraud risk management including known or suspected fraud;
- (d) Reporting to FCDO on instances of fraud and/or error as required by them
- (e) assisting in the investigation of suspected fraud;
- (f) monitoring compliance with internal controls and agreed policies and procedures;
- (g) ensuring that delivery partners have the necessary policies and procedures in place to prevent and detect fraud, corruption and bribery; and
- (h) ensuring that delivery partners have access to and are aware of the CSC's Anti- Fraud, Bribery and Corruption Policy and Procedure.

1.3 Delivery partners are responsible for:

- (a) developing, implementing and maintaining adequate systems of internal control to prevent and detect fraud, corruption and bribery;
- (b) ensuring that the CSC and FCDO's reputation and assets are protected against fraud, corruption and bribery;
- (c) reporting to the CSC all aspects of fraud risk management including copies of all relevant policies and reports of known or suspected fraud, corruption and bribery;
- (d) reporting to the CSC any allegation of fraud, bribery or corruption made against the partner including the results of investigations into allegations related to the work of the CSC;
- (e) assisting in the investigation of suspected fraud, corruption and bribery; and
- (f) monitoring compliance with internal controls and agreed policies and procedures.

1.4 FCDO Internal Audit and Investigations Directorate (IAID) is responsible for:

- (a) ensuring that the CSC and FCDO's reputation and assets are protected against fraud, corruption and bribery;
- (b) assisting in the investigation of suspected fraud, corruption and bribery; and
- (c) providing advice and assistance to the CSC and its delivery partners to

ensure that best practice systems are in place to prevent, detect and investigate allegations of fraud, bribery and corruption.

## **2. Receipt of Report of Fraud, Bribery or Corruption to the CSC**

- 2.1 Reports emailed to [fraud@cscuk.org.uk](mailto:fraud@cscuk.org.uk) or received by post will be directed to the Head of CSC or their delegate. This includes reports referred to the CSC by FCDO (IAID) or a delivery partner.
- 2.2 The Head of CSC or their delegate will log the report on the Fraud Register.
- 2.3 The Head of CSC or their delegate will assess whether the allegation falls within the Anti-Fraud, Bribery and Corruption Policy.
- 2.4 Within 10 working days of receipt of the report, the Head of CSC or their delegate will either acknowledge receipt of the report or respond noting that the matter falls outside the Anti-Fraud, Bribery and Corruption Policy. The Head of CSC or their delegate may refer the individual to another policy if appropriate (such as the Complaints Policy or Safeguarding Policy). The response will be made to the individual who submitted the report by the communication method in which the report was received.
- 2.5 Where the allegation falls within this policy the Head of CSC or their delegate will, within 10 working days of receipt of the report, make the Head of CSC (where the responsibility for handling reports has been delegated), the Director of Scholarships, the Chair of the CSC's Audit and Risk Management (ARM) Committee and the Chair of the Commission aware of the allegation.

## **3. Investigation of reports received by the CSC**

- 3.1 The Head of CSC or their delegate will within 30 working days of receipt of the report, consider the evidence presented and investigate as appropriate and proportionate and will, in consultation with the CSC Chair and the Chair of the ARM Committee, agree either:
  - (a) that the allegation has no basis and should be rejected; or
  - (b) that the allegation has an evidentiary base and that there is a prima facie case for it to be considered fully under the Anti-Fraud, Bribery and Corruption Policy.
- 3.2 In the event of 3.1(b) above the Chair of the ARM Committee will decide whether:
  - (i) further action or investigation is required; and/or
  - (ii) whether the allegation should be referred to the FCDO IAID for further advice or investigation; and/or whether new policies or procedures are required to be introduced in light of the investigation.
- 3.3. In the event of (ii) above the Chair of the Commission or their delegate will inform FCDO IAID in their capacity as the Accounting Officer to the CSC.

## **4. Communication of decision of the CSC**

- 4.1 In the event of 3.1(a) above the Head of CSC shall inform the individual who submitted the report of the decision within 10 working days of it being made.

4.2 In the event of 3.1(b) the Head of CSC shall, within 10 working days of the decision being made, inform the individual who submitted the report that the CSC believes that there is a prima facie case for it to be considered under the Anti-Fraud, Bribery and Corruption Policy.

**5. Reporting of reports received by the CSC**

- 5.1 Reports received by the CSC include reports received after investigations have been concluded by delivery partners or by FCDO IAID. The details and outcome of the allegation will be recorded in the Fraud Register
- 5.2 The Fraud Register will be tabled annually to the Audit and Risk Management Committee of the CSC. The tabled Register will maintain the confidentiality of the person making the allegation, and (unless the allegation has been upheld) the subject of the allegation, as far as may be practical.
- 5.3 Where appropriate, changes in policy or practice resulting from any allegation will also be recorded in the minutes of the meeting concerned.
- 5.4 The Secretariat will report to the CSC ARM Committee at each of its meetings on any allegations or incidences of fraud, corruption or bribery as well as all incidences of overpayment and repayment of stipend not owed.
- 5.5 The CSC will, on a quarterly basis, report any allegations of fraud, corruption or bribery that have been partially or fully upheld to FCDO and will submit, on a quarterly basis, figures on money paid out in error and recovered as requested by FCDO
- 5.6 The Chair of the ARM Committee shall report on any allegations that have been partially or fully upheld to the next full meeting of the Commission.

Date of Last Review	20/04/2022 (CSC ARM Committee)
Date of Next Review	March 2025 (CSC ARM Committee)