

COMMONWEALTH SCHOLARSHIP COMMISSION IN THE UNITED KINGDOM

Anti-Fraud Policy and Procedure

Policy Statement

The Commonwealth Scholarship Commission (CSC) is committed to the prevention of fraud and the promotion of an anti-fraud culture.

The CSC operates a zero-tolerance attitude to fraud and requires Commissioners, members of the Secretariat staff, members of selection committees, applicants, Scholars, Fellows and suppliers to act honestly and with integrity at all times, and to report all reasonable suspicions of fraud.

The CSC 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. Perpetrators may be subject to appropriate action, including legal action.

Definition of fraud

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.

Examples include (but are not limited to) falsely claiming academic and other achievements, submitting false documentation, falsely claiming expenses, not declaring absences from the UK, failing to repay advances of stipend or payments an individual is not otherwise entitled to. Individuals can be prosecuted under the Fraud Act 2006 if they make a false representation, fail to disclose information or abuse their position.

Key responsibilities

The CSC is responsible for:

- Regularly reviewing its anti-fraud policy statement and compliance to ensure it remains effective and relevant.
- Investigating all allegations of fraud and pursuing appropriate action, including legal action.

The Secretariat is responsible for:

- Developing, implementing and maintaining adequate systems of internal control to prevent and detect fraud.
- Ensuring that the CSC's reputation and assets are protected against fraud.
- Reporting to the CSC on all aspects of fraud risk management including known or suspected fraud.
- Assisting in the investigation of suspected fraud.
- Monitoring compliance with internal controls and agreed policies and procedures.
- Ensuring organisations the Commission is working with, such as national nominating agencies are aware of the CSC's Anti-Fraud Policy and Procedure.

Reporting suspicions

Those suspecting actual, attempted or suspected fraud should report their concerns in the first instance to the Executive Secretary of the Commission or to the DFID Counter Fraud and Whistleblowing Unit (CFWU) at the address below. Individuals should not attempt to investigate any fraud themselves.

The Executive Secretary will investigate and provide a report on the evidence gathered within 21 days, or as soon as practicable thereafter, to the Chair of the Audit and Risk Management (ARM) committee. The Chair of ARM will normally decide, within 7 days, whether any further action is required, and together with the Executive Secretary shall be responsible for the introduction of any change in Commission procedures, or action against any individual. The Executive Secretary also has responsibility for reporting any circumstances deemed necessary to DFID, in his role as Commission Accounting Officer. Where any complaint is wholly or partially upheld, the Chair of ARM shall provide a report on this, and actions taken as a result, to the next meeting of the Commission.

In the event that any complaint or suspicion should rest on the Executive Secretary or the Chair of the ARM Committee, then the initial approach may be made to the Deputy Chair. Alternatively, in such cases approaches may be made directly to the DFID Counter Fraud and Whistleblowing Unit (CFWU):

Head of Internal Audit
Abercrombie House
Eaglesham Road
East Kilbride
G75 8EA
+44 (0)1355 843747
fraud@dfid.gov.uk

The Public Interest Disclosure Act 1998 protects employees who raise concerns about certain matters of public interest in good faith. The Commission will take all reasonable steps to ensure that confidentiality is maintained in such cases, and that those making complaints are not disadvantaged in any way by doing so. In addition, free independent advice can be obtained from the charity Public Concern at Work on 020 7404 6609 (www.pcaw.org.uk).