



ANTI-FRAUD, BRIBERY AND CORRUPTION POLICY

Policy reference UKV-QA-33 | Version 3.0

UK Versity Online Limited | BAC Accredited College | UKPRN 10052768

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Author	Director of Education
Approved by	Principal (Ramanjeet Singh), on behalf of the Academic Board
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Anti-Fraud, Bribery and Corruption Policy

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Document control

Title	Anti-Fraud, Bribery and Corruption Policy
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Owner	Principal
Author	Director of Education
Approval authority	Academic Board, chaired by the Principal (Ramanjeet Singh)
Approval date	12 October 2026
Applies to	All UK Versity employees, workers, self-employed tutors, assessors, Internal Quality Assurers, contractors, recruitment agents and anyone acting on UK Versity's behalf; learners and applicants in relation to fees, identity and certification
Supersedes	Anti-Fraud Policy (QA-14, Ver. 17, revised 7 May 2017, next review November 2018)
Summary	Sets UK Versity's zero-tolerance position on fraud, bribery and corruption, the controls that prevent it, how to report a concern and how suspected cases are investigated and reported to awarding organisations and the police.

Compliance mapping

BAC College Scheme 2023 standards	1.6; 1.7; 4.1-4.4; 5.7; 11.7
UK Quality Code 2024 (voluntary)	Principles 1 and 5
OfS conditions (benchmark only; UK Versity is not OfS registered)	E (benchmark)
Awarding organisations	ATHE; Pearson; OTHM; Ascentis; NCFE; IFA Direct (malpractice reporting, Ofqual General Condition A8)
Legislation and regulation	Fraud Act 2006; Theft Act 1968; Bribery Act 2010; Economic Crime and Corporate Transparency Act 2023 (good practice); Criminal Finances Act 2017; Proceeds of Crime Act 2002; Public Interest Disclosure Act 1998; UK GDPR and Data Protection Act 2018

Version history

Version	Date	Change
1.0	August 2014	First issue as Anti-Fraud Policy (QA-14)
2.0	May 2017	Revision (Ver. 17)
3.0	October 2026	Full rebuild: fraud, bribery and corruption in one policy; current offences (Fraud Act 2006, Bribery Act 2010, ECCTA 2023, Criminal Finances Act 2017); education fraud risks; gifts and hospitality register; fraud response plan with awarding organisation and Report Fraud routes; obsolete references to funding bodies, trustees and internal auditors removed; BAC/QAA/OfS mapping and version control

1. Purpose

UK Versity Online Limited (trading as UK Versity) is responsible for learners' fees, for the integrity of the qualifications it delivers on behalf of awarding organisations, and for the trust that learners, employers and regulators place in its certificates. This policy sets out UK Versity's position on fraud, bribery and corruption, the controls that prevent them, what to do if you suspect them, and how UK Versity responds.

It supports BAC standards 1.6 and 1.7 (risk management and conducting financial matters professionally, transparently and with appropriate probity), 4.1 to 4.4 (accurate publicity and information on qualifications), 5.7 (recruitment agents) and 11.7 (identifying and discouraging malpractice).

2. Scope

This policy applies to:

- everyone who works for UK Versity, whether employed, self-employed or engaged through an agency, including tutors, assessors and Internal Quality Assurers;
- contractors, suppliers and recruitment agents, and anyone else who performs services for or on behalf of UK Versity (an "associated person" under the Bribery Act 2010);
- learners and applicants, in relation to fees, payments, identity, application documents, assessment and certification.

Assessment malpractice by learners (for example plagiarism or misuse of AI) is dealt with under UKV-QA-19 Academic Integrity, Plagiarism and Use of AI Policy and UKV-QA-20 Malpractice and Maladministration Policy and Procedure. Where suspected fraud also affects assessment or certification, UKV-QA-20 is followed for the awarding organisation steps and this policy for the financial, criminal and reporting steps.

3. Definitions

- **Fraud:** dishonestly making a false representation, failing to disclose information you have a legal duty to disclose, or abusing a position of trust, intending to make a gain or cause a loss (Fraud Act 2006, sections 2, 3 and 4). Making, possessing or supplying articles for use in fraud is also an offence (sections 6 and 7). Attempted fraud is treated in the same way as completed fraud.
- **Theft and false accounting:** dishonestly taking property belonging to another, or falsifying, destroying or concealing any account or record made for an accounting purpose (Theft Act 1968, including section 17).
- **Bribery:** offering, promising or giving a financial or other advantage to induce or reward improper performance, or requesting, agreeing to receive or accepting one (Bribery Act 2010, sections 1 and 2), including bribing a foreign public official (section 6).

- **Corruption:** the abuse of entrusted power for private gain, including bribery, collusion and improper influence over admissions, assessment, certification or purchasing.
- **Facilitation of tax evasion:** knowingly helping another person to evade tax (Criminal Finances Act 2017).
- **Certificate fraud:** producing, altering or presenting a false certificate, result or transcript, or making a false claim for certification to an awarding organisation.
- **Associated person:** anyone who performs services for or on behalf of UK Versity, including staff, agents and contractors.

4. Policy statement

1. UK Versity has **zero tolerance** for fraud, bribery and corruption, whether committed by staff, contractors, agents, learners or anyone else, and whether it benefits UK Versity or harms it.
2. UK Versity will not offer, pay, request or accept bribes, and will not make facilitation payments.
3. Every suspicion that is reasonably held will be taken seriously, recorded and looked into.
4. UK Versity will report suspected fraud affecting qualifications to the relevant awarding organisation, will report crime to the police where appropriate, and will try to recover any losses.
5. Anyone who raises a genuine concern is protected from victimisation. Victimising or deterring someone who reports a concern is a serious disciplinary matter. Knowingly making a false or malicious allegation is also a disciplinary matter.
6. UK Versity is not a large organisation within the Economic Crime and Corporate Transparency Act 2023 failure to prevent fraud offence, but it adopts the six principles of the Home Office guidance as good practice: top-level commitment, risk assessment, proportionate procedures, due diligence, communication and training, and monitoring and review. The same principles underpin the "adequate procedures" defence to the Bribery Act 2010 section 7 offence.

5. Fraud risks in UK Versity's work

The Principal keeps the main fraud, bribery and corruption risks in the Business Continuity Risk Register (UKV-QA-03 Business Continuity, Contingency and Disaster Recovery Policy) and reviews them at least annually. The risks UK Versity manages include:

Area	Examples of the risk
Certificates and results	Forged or altered certificates; false claims for certification; certificates claimed for learners who did not complete the assessment
Identity and assessment	Impersonation in online sessions, assessments or exams; false identity documents; buying or commissioning assignments
Admissions	False qualifications, references or documents submitted with an application; false information in a visitor application (UKV-QA-34)
Fees and payments	Enrolments paid with stolen cards; chargeback abuse; refunds requested to a different account; diversion of learner payments
Suppliers and invoices	Fake invoices; changes to supplier bank details by email (payment diversion); duplicate payments
Recruitment agents	False promises to applicants; falsified applicant documents; undisclosed fees taken from learners; commission paid for learners who do not exist

Area	Examples of the risk
Bribery and inducements	Gifts or payments offered to staff to pass work, change a grade, admit an applicant or approve a refund
Cyber	Phishing emails to obtain Moodle, email or payment credentials (UKV-QA-30)

6. Prevention controls

6.1 Financial controls

1. Duties are separated so that no single person can both authorise and make a payment. The Financial Controller authorises payments and the Principal approves any single payment above the limits set by the Financial Controller.
2. Any request to change a supplier's or learner's bank details is checked by telephone using contact details already held by UK Versity, never details given in the request.
3. Refunds are paid only to the person or organisation that paid the fees and, where possible, by the original payment method (UKV-QA-08 Fees, Payment, Cancellation and Refund Policy, section 10). Bank details for a refund are verified before payment.
4. UK Versity does not accept cash payments for fees.
5. Card payments are processed only through UK Versity's approved payment providers. Staff never take or store full card details.
6. The Financial Controller reconciles bank accounts monthly and reports unusual transactions to the Principal.

6.2 Qualification and assessment controls

1. Learner identity is checked at enrolment and before any assessment or exam, in line with UKV-QA-13 Online and Distance Learning and Course Materials Policy and UKV-QA-22 Examinations and Controlled Assessment Policy.
2. Applicants' qualifications and documents are checked under UKV-QA-05 Recruitment and Admission Policy.
3. Certification claims are made only by the Registrar, after Internal Quality Assurance sign-off, under UKV-QA-07 Registration and Certification Policy.
4. Certificates are issued by the awarding organisations. Anyone who asks UK Versity to confirm a certificate is directed to the awarding organisation's verification service, and UK Versity confirms enrolment only with the learner's consent.

6.3 Recruitment agents and suppliers

1. Agents are selected, contracted, briefed and monitored under UKV-QA-02 Public Information, Marketing and Agents Policy. Agent contracts include anti-bribery and anti-fraud terms and allow UK Versity to end the contract immediately for breach.
2. New suppliers are checked before first payment. Contracts above routine purchases include an anti-bribery clause.

6.4 Gifts and hospitality

1. Staff and associated persons must not offer or accept any gift, hospitality or advantage that could influence, or appear to influence, admissions, assessment, certification, refunds, purchasing or any other decision.
2. **Gifts from learners, applicants or agents connected with assessment, admissions or refunds must always be declined**, whatever their value (UKV-QA-21 Conflict of Interest Policy).
3. Other modest gifts or hospitality worth **£25 or less** in normal business may be accepted. Anything worth more than £25, and anything declined, is recorded in the **Gifts and Hospitality Register** held by the Financial Controller, with the date, giver, description, estimated value and whether it was accepted.
4. The Principal reviews the register every term.

6.5 Conflicts of interest

Personal, family or financial interests that could affect a decision must be declared under UKV-QA-21 Conflict of Interest Policy before the decision is taken.

6.6 Training and communication

1. All staff read this policy at induction and confirm in writing that they have done so (UKV-QA-27 Staff Recruitment, Induction and Development Policy).
2. Staff who handle payments, admissions or certification receive fraud awareness training, including phishing and payment diversion, at induction and at least every two years.
3. This policy is published on the UK Versity website.

7. Reporting a concern

7.1 What to do

- **Do** write down your concern straight away: what you saw or heard, names, dates, times, amounts and any witnesses. Sign and date your note.
- **Do** keep any documents or evidence safe and unchanged.
- **Do** report it promptly using section 7.2.
- **Do not** confront the person you suspect or try to investigate yourself. This can alert them, destroy evidence and damage a later police case.
- **Do not** discuss your concern with anyone other than the people named in section 7.2.

7.2 Who to report to

1. **Staff and associated persons:** report to the Principal. If the concern involves the Principal, report to the Quality Manager, who will deal with it independently of the Principal and may involve an external adviser (as in UKV-QA-28 Whistleblowing Policy, section 5.1).
2. **Learners, applicants and members of the public:** email admin@ukversity.co.uk with the subject "Confidential: fraud concern", or telephone 0161 273 4745 and ask to speak to the Principal.
3. You may report anonymously. Anonymous reports are harder to investigate, so UK Versity encourages you to give your name. Your identity is kept confidential as far as the law and the investigation allow, and you will be told in advance if it cannot be kept confidential.
4. Staff who report fraud in the public interest are protected under the Public Interest Disclosure Act 1998. External routes, including HM Revenue and Customs as a prescribed person, are set out in UKV-QA-

28 Whistleblowing Policy, section 7. Serious or complex fraud, bribery and corruption can also be reported to the Serious Fraud Office, which is a prescribed person for these matters.

5. Anyone can report fraud directly to the police through **Report Fraud**, the national fraud and cybercrime reporting service (reportfraud.police.uk, 0300 123 2040), which replaced Action Fraud on 4 December 2025. Call 999 if a crime is in progress.

8. Fraud response plan

8.1 Initial assessment

1. The Principal (or the Quality Manager where the Principal is involved) records the concern in the confidential fraud log within 1 working day and makes an initial assessment within 5 working days.
2. If there is no basis for the concern, the person who raised it is told and the record is closed.
3. If the concern involves assessment, a learner's results or a certification claim, the Quality Manager, on behalf of the Head of Centre, informs the relevant awarding organisation **before** starting any internal investigation and follows its instructions, in line with UKV-QA-20 Malpractice and Maladministration Policy and Procedure.

8.2 Securing evidence and preventing further loss

1. The Principal takes immediate steps to secure evidence, for example preserving emails, Moodle logs, payment records and devices, and to prevent further loss, for example suspending system access, stopping payments or holding a certification claim.
2. A member of staff may be suspended on full pay while an investigation takes place where there are reasonable grounds. Suspension is not a disciplinary sanction and does not imply guilt.

8.3 Investigation

1. The Principal appoints an Investigating Officer who has no involvement in the matter and no personal interest in the outcome. Where no suitable independent person is available internally, the Principal appoints an external investigator or, for qualification matters, follows the awarding organisation's advice.
2. The Investigating Officer keeps a dated record of every step, interview, document and decision, and treats everyone fairly. Suspicion is not treated as proof.
3. People interviewed are told the concern, may be accompanied as allowed by UK Versity's staff procedures, and are given the chance to respond.
4. Where criminal proceedings are possible, the Principal consults the police before interviewing the person suspected, so that the police case is not harmed. Police enquiries take priority over UK Versity's internal process, and staff must co-operate with the police and with awarding organisation investigators.

8.4 Reporting the outcome

1. The Investigating Officer gives the Principal a written report covering the allegation, the evidence, the findings, the loss, any recovery and recommendations to strengthen controls. For long cases, interim reports are given at least monthly.
2. The Principal decides the action to take and reports a summary of each case, without personal data, to the next Academic Board.

8.5 External reporting

Who	When	By whom
Awarding organisation (ATHE, Pearson, OTHM Qualifications, Ascentis, NCFE, IFA Direct through ATHE)	Any suspected fraud affecting registration, assessment, results or certification, immediately and before any internal investigation	Quality Manager on behalf of the Head of Centre, under UKV-QA-20
Police (Report Fraud, or 999 for crime in progress)	Suspected criminal fraud, theft or bribery, as soon as the initial assessment supports it	Principal
National Crime Agency (Suspicious Activity Report)	Where the Principal knows or suspects money laundering, for example fees paid with proceeds of crime or a request to refund to a third party	Principal
Payment provider or bank	Card fraud, chargeback abuse or payment diversion, the same working day	Financial Controller
Information Commissioner's Office	A fraud that is also a personal data breach likely to cause a risk to individuals, within 72 hours	Data Protection Lead, under UKV-QA-29
BAC	Any matter that BAC accreditation conditions require UK Versity to report	Principal
Insurers	Any loss that may be covered by insurance	Financial Controller

8.6 Action and recovery

1. Proven fraud, bribery or corruption by staff is gross misconduct and is dealt with under UK Versity's disciplinary procedure, which may lead to dismissal.
2. Contracts with agents, contractors or suppliers involved in fraud or bribery are ended.
3. Learners involved in fraud are dealt with under UKV-QA-20 and UKV-QA-09 Learner Terms and Conditions, which may lead to withdrawal from the course and to the awarding organisation cancelling results or certificates.
4. UK Versity takes all reasonable steps, including legal action, to recover losses from those responsible.
5. After every proven case, the Principal reviews the controls that failed and records the improvements in the risk register.

9. Roles and responsibilities

Role	Responsibilities
Principal and Director of Education (Head of Centre)	Overall responsibility for this policy and for fraud prevention; receives reports; decides on investigation, suspension, police referral and external reporting; appoints the Investigating Officer; reports cases to the Academic Board
Financial Controller	Financial controls, payment authorisation, bank reconciliation, refund checks, the Gifts and Hospitality Register; reports card and payment fraud to banks and payment providers

Role	Responsibilities
Quality Manager	Receives reports where the Principal is involved; links fraud cases to malpractice procedures; checks agent monitoring records
Registrar	Identity and document checks at admission; certification claims only after IQA sign-off
Data Protection Lead	Personal data breach assessment and ICO reporting
Investigating Officer	Conducts the investigation fairly and keeps the record; writes the report
All staff and associated persons	Follow this policy and the controls; declare gifts and conflicts; report suspicions promptly; co-operate with investigations
Academic Board	Receives anonymised case summaries and the annual review of this policy

10. Awarding organisation requirements

Awarding organisation	Requirement	Source
Pearson	Suspected staff or centre malpractice reported immediately; the Head of Centre informs Pearson's Investigations team before starting any internal investigation	Centre guidance: Dealing with malpractice and maladministration v5.3 (30 January 2026), sections 5.3 to 5.8
OTHM Qualifications	Fraudulent certification, falsification of records and impersonation are malpractice and must be reported promptly	Malpractice, Maladministration and Investigations Policy v4.0 (December 2025)
NCFE (including NCFE CACHE)	Falsification of records is malpractice; suspected malpractice reported immediately	Malpractice and Maladministration Policy PA-014 v1.1 (22 June 2026), section 4.1
ATHE, IFA Direct and Ascentis	Suspected malpractice, including fraud affecting assessment or certification, reported under each awarding organisation's malpractice policy as set out in UKV-QA-20	UKV-QA-20 Malpractice and Maladministration Policy and Procedure

All awarding organisations act under Ofqual General Condition of Recognition A8, which requires them to prevent and investigate malpractice and maladministration in their centres.

11. Related policies and legislation

- UKV-QA-02 Public Information, Marketing and Agents Policy
- UKV-QA-03 Business Continuity, Contingency and Disaster Recovery Policy
- UKV-QA-05 Recruitment and Admission Policy
- UKV-QA-07 Registration and Certification Policy
- UKV-QA-08 Fees, Payment, Cancellation and Refund Policy
- UKV-QA-19 Academic Integrity, Plagiarism and Use of AI Policy
- UKV-QA-20 Malpractice and Maladministration Policy and Procedure
- UKV-QA-21 Conflict of Interest Policy
- UKV-QA-28 Whistleblowing Policy
- UKV-QA-29 Data Protection and Records Retention Policy

- UKV-QA-30 Acceptable Use, E-Safety, Email and Social Media Policy
- UKV-QA-34 Short-term Study Visitor Admissions, Fees and Refund Policy
- Fraud Act 2006; Theft Act 1968; Bribery Act 2010 and the Ministry of Justice guidance on adequate procedures; Economic Crime and Corporate Transparency Act 2023 and the Home Office guidance on the failure to prevent fraud offence; Criminal Finances Act 2017; Proceeds of Crime Act 2002; Public Interest Disclosure Act 1998; UK GDPR and Data Protection Act 2018

Records of fraud investigations are kept for 6 years after the case closes, or longer if legal proceedings are ongoing, and the Gifts and Hospitality Register for 6 years. These periods will be added to the UKV-QA-29 Data Protection and Records Retention Policy retention schedule at its next revision.

12. Monitoring and review

The Principal reviews this policy, the fraud log, the Gifts and Hospitality Register and the fraud risks in the risk register every year and reports to the Academic Board. The policy is also reviewed after any proven case of fraud or bribery, and whenever legislation, awarding organisation requirements or BAC standards change.

Approval and review

Stage	Name and role	Date
Prepared by	Director of Education	30 September 2026
Checked by (policy owner)	Principal	30 September 2026
Approved by	Ramanjeet Singh, Principal and Director of Education, on behalf of the Academic Board	12 October 2026
Next review due	Quality Manager (Shazia Khan) to schedule through the Policy Register UKV-QA-REG	September 2027