



**“Enabling Students to Accomplish their Academic Goal”**

## **Fraud and Inappropriate Use of Public Funds Policy**

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## **1. Introduction**

Bellmont College is committed to the highest standards of honesty, integrity, transparency and accountability in the management of public funds, student funding, institutional resources, financial information and regulated student records. Public money must be used lawfully, appropriately, efficiently and only for the purposes for which it is provided. This policy explains how Belmont College prevents, detects, stops, reports, investigates and responds to fraud, bribery, corruption, financial misstatement, data manipulation and inappropriate use of public or institutional funds.

Bellmont College adopts a zero-tolerance approach to fraud and inappropriate use of public funds. Zero tolerance means that reasonable concerns are taken seriously, assessed promptly and addressed fairly through proportionate action. It does not mean that every concern is automatically treated as proven misconduct. Belmont College distinguishes between genuine error, negligence, reckless disregard for controls, deliberate misconduct and criminal conduct.

Bellmont College currently works with Liverpool Hope University as an awarding and academic partner for relevant higher education provision. Under this partnership, students may receive teaching, learning support and local services from Belmont College while the award, academic regulations and elements of academic oversight are governed through Liverpool Hope University arrangements, depending on the programme and applicable partnership framework. Belmont College is also seeking Office for Students approval for its own funding arrangements and future institutional development. This may affect future processes, funding flows, regulatory reporting and governance responsibilities, but Belmont College continues to protect student interests, safeguard public funds, maintain transparency and ensure that students are not disadvantaged by transition, regulatory change or partnership development.

This policy is designed to operate within the current Liverpool Hope University partnership and to remain suitable for future independent or revised regulatory arrangements. Where Liverpool Hope University policies, systems, student records, academic regulations, funding processes or reporting obligations apply, Belmont College cooperates with Liverpool Hope University, follows applicable partnership requirements and signposts students and staff clearly. Where Belmont College assumes direct responsibility under future arrangements, this policy and related procedures are reviewed so that public funds, student data and student interests remain protected (*LHU QH8 Liverpool Hope University Academic Partnership Handbook; LHU Liverpool Hope University Academic Regulations*).

## **2. Purpose of the Policy**

The purpose of this policy is to establish a clear, practical and evidence-based framework for preventing, detecting, stopping and responding to fraud and inappropriate use of public funds. The policy brings together financial governance, student funding integrity, data assurance, procurement, conflicts of interest, anti-bribery controls,

whistleblowing, investigations, partnership oversight, audit, training and committee reporting into one Belmont College-wide framework.

This version strengthens the existing policy by making the E8 internal control process explicit. The control process shows how Belmont College prevents risks before they arise, detects indicators of fraud or inappropriate use of public funds, and stops or contains concerns quickly when they are identified. It also shows how Belmont College records evidence of implementation so that committees and the Board of Directors can test whether controls are operating in practice.

The policy supports Belmont College in ensuring that:

- public funds are received, accessed, recorded and spent only for lawful and approved purposes;
- student funding, attendance, engagement, enrolment, continuation and outcome records are accurate, complete and capable of audit;
- financial decisions are supported by segregation of duties, approval limits, evidence, value-for-money checks and clear audit trails;
- fraud, bribery, corruption, conflicts of interest, student data manipulation and supplier irregularity are prevented where possible and identified early where risks arise;
- concerns can be raised safely through clear reporting and whistleblowing routes;
- investigations are fair, confidential, evidence-based and proportionate;
- students are protected where funding concerns, control failures or investigations could affect teaching, support, continuation or confidence in Belmont College;
- committees receive regular evidence of compliance, risk management, audit findings and completed corrective actions.

### **3. Scope of the Policy**

This policy applies to all higher education and related educational activity carried out by Belmont College, including activity delivered under collaborative arrangements with Liverpool Hope University, where public funds, student funding, institutional funds, public information, regulated student records or student interests may be affected.

The policy applies to:

- members of the Board of Directors and any committee members acting on behalf of Belmont College;
- the Chief Executive Officer, Senior Management Committee, academic staff, professional services staff, finance personnel, registry, admissions, student support, IT, marketing and quality staff;
- students, applicants and former students where their conduct, data, funding, payment or claims may affect public funds or institutional records;
- contractors, consultants, suppliers, subcontractors, placement providers, partner organisations and other third parties acting for or with Belmont College;

- all financial transactions, student funding processes, enrolment records, attendance and engagement records, claims, procurement decisions, payment approvals, expenses, grants, donations, gifts, hospitality and use of Belmont College systems or assets.

The policy applies regardless of employment status, contractual arrangement, location, delivery mode or whether activity is carried out on campus, remotely, through digital systems, through a partner or by a third party acting on behalf of Belmont College. It also applies where Belmont College accesses public funds indirectly through a lead provider, awarding body, partner arrangement, Student Loans Company route, grant or other public funding mechanism.

#### 4. Regulatory, Legal and Quality Assurance Framework

Requirement	Relevance to this Policy
Office for Students Condition E8	Requires controls to detect, prevent and stop fraud offences and inappropriate use of public funds.
Office for Students Conditions E1, E2, E3, E7 and E9	Support governance, accountability, business planning, fitness and propriety, public money and risk oversight.
Office for Students Conditions C1 to C5	Support consumer protection, complaints, student protection and fair treatment where funding or fraud issues affect students.
Higher Education and Research Act 2017	Provides the statutory context for Office for Students regulation and registration requirements.
Fraud Act 2006, Theft Act 1968 and Criminal Law Act 1977	Cover fraud, false accounting, false statements and conspiracy to defraud.
Economic Crime and Corporate Transparency Act 2023	Supports reasonable fraud prevention procedures and the corporate failure to prevent fraud offence where applicable.

Bribery Act 2010, Criminal Finances Act 2017, Proceeds of Crime Act 2002 and Money Laundering Regulations	Support controls for bribery, tax evasion facilitation, money laundering and financial crime risks.
Procurement Act 2023 and applicable procurement rules	Support transparent, value-for-money and auditable procurement where public or publicly supported funds are used.
Consumer Rights Act 2015, Consumer Protection from Unfair Trading Regulations 2008 and Consumer Contracts Regulations 2013	Support accurate information, fair terms, clear fees, refunds and complaint routes for students.
UK GDPR and Data Protection Act 2018	Require lawful, fair, transparent and secure handling of student, staff, financial, whistleblowing and investigation data.
Equality Act 2010	Requires non-discrimination, accessibility, reasonable adjustments and equality impact consideration.
Public Interest Disclosure Act 1998 and Employment Rights Act 1996	Protect eligible workers who raise qualifying concerns and support safe reporting routes.
UK Quality Code for Higher Education	Supports quality management, data-informed decision-making, partnership provision, admissions, assessment, complaints and appeals.
Liverpool Hope University partnership requirements	Apply where partnership students, data, records, academic regulations, funding routes or student protection responsibilities are affected.

## **5. Core Principles**

Bellmont College's approach is based on the principle that public funds and student-related funds must be protected as carefully as academic standards and student interests. Fraud prevention is a whole-provider responsibility and must be embedded into governance, finance, registry, admissions, quality assurance, student support, IT, procurement, partnership management and daily professional conduct.

- Integrity: staff, directors, students and third parties must act honestly and must not seek personal, financial or organisational benefit through deception or misuse of funds.
- Accountability: decisions involving funds, records, claims and approvals must have named owners, clear evidence and an auditable trail.
- Transparency: material funding, procurement, conflict, reporting and investigation decisions must be recorded and reported through the correct route.
- Prevention first: controls, training, segregation of duties and risk assessment should reduce opportunities for fraud before problems occur.
- Active detection: Belmont College must not rely only on reports or complaints; it must use checks, reconciliation, trend review, data validation and audit to identify warning signs.
- Stopping and containment: where a concern arises, Belmont College must act promptly to prevent further loss, further misreporting, further payments or further student impact while maintaining fairness and due process.
- Proportionality: concerns are assessed fairly and proportionately, distinguishing between error, negligence, misconduct and deliberate fraud.
- Student protection: students should not be disadvantaged by institutional fraud controls, investigations or funding transition, and any material effect on students must be managed through appropriate support and communication.
- Confidentiality and fairness: reports and investigations are handled sensitively, securely and without retaliation against people who raise genuine concerns.
- Continuous improvement: audit findings, incidents, complaints, data checks and near misses are used to strengthen controls and training.

## **6. Definitions and Examples of Fraud and Inappropriate Use of Public Funds**

Fraud means an intentional act of deception, concealment, misrepresentation or abuse of position intended to secure an unfair or unlawful benefit, cause loss to Belmont College or a public funding body, or expose Belmont College, students or partners to financial, regulatory or reputational harm. Attempted fraud is treated as seriously as completed fraud.

Inappropriate use of public funds means expenditure, allocation, claim, transfer, reporting or use of funds that is not consistent with the purpose for which the funds were provided, approved funding conditions, institutional procedures, value-for-money expectations, legal requirements or regulatory requirements. It may include deliberate

misuse, reckless disregard for controls, failure to maintain evidence, use for private benefit, or repeated failure to correct known weaknesses.

Fraud should be distinguished from genuine error. A genuine error may occur where a person acts honestly but makes an accidental mistake, for example a data entry error that is quickly corrected and reported. Fraud or inappropriate use may be indicated where information is knowingly falsified, evidence is concealed, controls are bypassed, approval limits are avoided, conflicts are not declared, or a person fails to correct inaccurate information after becoming aware of it.

Examples of fraud or inappropriate use of public funds may include:

- falsifying enrolment, attendance, engagement, completion, assessment submission or student status records;
- submitting inaccurate student funding claims or allowing claims to continue where eligibility is known to be in doubt;
- misreporting data to Liverpool Hope University, the Student Loans Company, the OfS, awarding bodies, auditors or other external bodies;
- using institutional or public funds for personal benefit, unauthorised hospitality, personal purchases or private travel;
- approving invoices for goods or services not received, bogus suppliers, inflated prices, duplicate payments or altered bank details;
- bypassing procurement procedures, splitting purchases to avoid approval thresholds, manipulating quotations or favouring a supplier because of a personal interest;
- accepting or offering bribes, kickbacks, inappropriate gifts, hospitality or inducements;
- concealing conflicts of interest in recruitment, admissions, supplier selection, assessment, employment or partnership decisions;
- using student support, hardship, bursary, grant or project funds for a purpose outside the approved criteria;
- using Belmont College systems, records or data to obtain a benefit for Belmont College, a student, a staff member, a supplier or a third party through deception;
- collusion with sponsors, employers, suppliers, students or other third parties to falsify documents, claims or records;
- failing to report a known or suspected irregularity where there is a duty to do so.

## **7. Public Funds and Areas of Higher-Risk Activity**

For the purposes of this policy, public funds include funds received directly or indirectly from government, public bodies, the Student Loans Company, the Office for Students, Liverpool Hope University or another lead provider, grant-making bodies, public contracts, regulated student finance arrangements and any other public or publicly supported source. This includes funds that pass through a partner or lead provider

before reaching Belmont College, as well as funds used to support students, teaching, learning resources or regulated higher education activity.

Bellmont College recognises that risks may arise not only in finance teams but also in academic, registry, admissions, data, partnership and student support activity. Higher-risk areas include student recruitment and admissions, identity and eligibility checks, student attendance and engagement records, funding claims, fee payments, refunds, procurement, supplier management, expenses, payroll, gifts and hospitality, conflicts of interest, subcontracted provision, data returns, student support funds, hardship payments and use of public information.

Bellmont College also maintains student-facing awareness of external fraud and scam risks. Students can be vulnerable to fee payment scams, fake payment requests and impersonation of official organisations. Finance, admissions and student support communications must therefore be clear about approved payment routes, official contact channels and how students should check concerns before making payments or sharing personal information.

### 8. Internal Control Process: Prevention, Detection and Stopping

This section is Belmont College’s internal control process for the purposes of OfS Condition E8. It should be read as the practical control route that supports the policy. It covers the detection, prevention and stopping of conduct, including a failure to act, that could potentially amount to a relevant fraud offence or inappropriate use of relevant public funds. It also addresses the accuracy of data submitted to other organisations for purposes related to receiving or accessing public funds.

They are designed to be clear enough to evidence compliance, but practical enough to operate day to day without creating unnecessary bureaucracy. Controls must be strengthened where risk, value, public funding exposure, student impact or partner responsibility is higher.

<b>Control area</b>	<b>Prevention controls</b>	<b>Detection checks</b>	<b>Stopping / response controls</b>	<b>Minimum evidence</b>
Governance and ownership	Named owners for finance, quality, registry, admissions, student records, IT and investigations; Board-approved policy; clear delegations and approval limits.	Committee review of risks, control gaps, audit findings, exceptions, incidents and action trackers.	Escalate high-risk concerns to Senior Management Committee, Risk/Audit route and Board; appoint investigation lead; record immediate actions.	Policy approval, delegations, committee minutes, risk register, action tracker.
Admissions, enrolment and eligibility	Published entry requirements; identity, qualification,	Sampling of admissions files; checks for unusual patterns, duplicate	Pause enrolment or confirmation where evidence is doubtful;	Admissions file, interview notes, eligibility

	English language and eligibility checks; recorded academic judgement for non-standard cases; partner approval where required.	documents, missing evidence, inconsistent eligibility or pressure to enrol unsuitable applicants.	escalate to Head of Professional Services, Head of Quality and Operations and Liverpool Hope University where relevant.	checklist, partner approval, exception log.
Attendance, engagement and student status	Clear rules for recording attendance, engagement, authorised absence, withdrawal, interruption and completion; staff guidance and system access controls.	Reconciliation between attendance, VLE/learning activity, tutor records, registry records and funding or partner records; review of manual adjustments.	Freeze or review doubtful records; correct data with audit trail; suspend submission of inaccurate data; escalate potential manipulation.	Attendance reports, reconciliation checks, change logs, correction records, escalation notes.
Student funding and data returns	Data validation before submissions to Liverpool Hope University, SLC, OfS, awarding bodies or other bodies; second-person review of material returns.	Exception reports, sampling of data returns, comparison with source records, review of late changes and unexplained variances.	Stop submission where accuracy is not evidenced; correct and resubmit where permitted; notify partner/funder/regulator where required.	Submission sign-off, validation report, source data, correction log, notification record.
Finance, payments and reconciliations	Segregation of duties; approved suppliers; authorisation limits; bank verification; payment evidence; budget holder review.	Monthly reconciliations; review of duplicate payments, unusual suppliers, altered bank details, manual payments, refund patterns and high-risk transactions.	Hold or recall payment; freeze supplier or student payment route; require senior approval; commence investigation and recovery.	Invoices, purchase orders, approvals, reconciliations, bank verification, payment hold/recovery record.

Procurement and suppliers	Quotations/tendering where required; value-for-money review; supplier due diligence; conflict declarations; contract terms with audit and anti-fraud obligations.	Review of procurement exceptions, single-supplier use, split purchases, repeated suppliers, related-party indicators and incomplete evidence.	Pause award or contract; remove conflicted decision-maker; re-run procurement; terminate or suspend supplier where justified.	Procurement file, quotations, due diligence, conflict record, contract, exception approval.
Gifts, hospitality and conflicts	Clear declaration requirements; gifts/hospitality register; conflict of interest declarations; recusal and alternative approver where required.	Periodic review of declarations, procurement/admissions decisions linked to declarations, unexplained benefits or undisclosed relationships.	Refuse/return/donate item; remove conflicted person from decision; investigate bribery or improper influence concerns.	Register entry, approval record, recusal note, escalation record.
Systems access and data security	Role-based access; password and MFA controls where available; leaver process; access reviews for finance, registry and student record systems.	Audit logs, access review, unusual login or record-change reports, cybersecurity and data breach monitoring.	Disable access, secure evidence, preserve logs, notify DPO/IT, apply incident response and data breach route if required.	Access review, system logs, leaver records, incident report.
Partnership and third-party activity	Clear partnership responsibilities; data-sharing rules; audit rights; contract controls; Liverpool Hope University escalation route; due diligence for third parties.	Review of partner reports, data inconsistencies, subcontractor/supplier concerns, student complaints and external feedback.	Secure records; notify Liverpool Hope University or relevant partner; agree lead investigation route; stop activity that exposes funds or students to risk.	Partnership records, Liverpool Hope University communications, contract controls, audit trail, action log.
Reporting and investigations	Whistleblowing and reporting routes; staff training; non-retaliation; investigation terms of reference and	Review of concerns, complaints, near misses, trend data, audit findings and anonymous or confidential reports.	Triage concern; protect evidence; stop further loss or data submission; investigate; recover	Concern log, triage note, investigation record, outcome letter, recovery

evidence preservation procedures.		funds; notify bodies where required.	and notification evidence.
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The internal control process operates as a continuous cycle: identify the risk, prevent the risk through controls, detect warning signs through checks and reporting, stop or contain the issue, investigate fairly, correct records or recover funds, notify relevant bodies where required, and report lessons through governance. The process is not optional; it must be used wherever public funds, regulated student records, partner reporting or student interests may be affected.

### 8.1 Mandatory control route where a concern arises

Stage	Required action	Owner / route
<b>1. Identify</b>	A concern is identified through routine checks, staff report, student concern, complaint, audit, finance review, registry check, partner communication or whistleblowing route.	Person identifying concern; relevant manager.
<b>2. Secure evidence</b>	Original records, system logs, emails, invoices, attendance records, data submissions and approvals are preserved. Suspected individuals should not be alerted unnecessarily.	Responsible manager, IT, Finance, Registry, Head of Quality and Operations.
<b>3. Stop or contain</b>	Pending payments, data submissions, enrolment confirmations, supplier changes or other risky actions are paused where necessary to prevent further loss or misreporting.	Senior Management Committee member or authorised manager.
<b>4. Triage</b>	The issue is classified as error, control weakness, misconduct, suspected fraud, bribery, data breach, safeguarding concern, partner issue or regulatory incident.	Head of Quality and Operations with relevant senior owner.
<b>5. Investigate</b>	A proportionate investigation is initiated with terms of reference, evidence requirements, conflicts check, timescale and reporting route.	Investigation lead / panel.
<b>6. Correct and recover</b>	Records, claims, payments, access permissions or public information are	Finance, Registry, Quality, Senior

	corrected; funds are recovered or protected where appropriate.	Management Committee.
<b>7. Notify</b>	Liverpool Hope University, SLC, OfS, auditors, insurers, police, Action Fraud, HMRC or other bodies are notified where required or justified.	CEO / Head of Quality and Operations / designated senior owner.
<b>8. Learn and monitor</b>	Control weaknesses, training needs, policy gaps and action plans are reported to committees and tracked to completion.	Relevant committee, Senior Management Committee and Board.

**9. Fraud Risk Assessment, Risk Appetite and Risk Register**

Bellmont College has a low appetite for fraud, bribery, corruption, deliberate misuse of public funds, deliberate data misreporting and any activity that could compromise student funding integrity, public trust, regulatory compliance or student interests. Bellmont College recognises that some operational error may occur in any organisation, but it expects errors to be reported, corrected and used for improvement. It has no appetite for concealing errors, manipulating records or bypassing controls.

Fraud risk assessment is incorporated into the institutional risk register and relevant departmental risk records (*BCP1 Belmont College Risk Management Policy and Risk Register*). Risk assessment considers likelihood, impact, existing controls, residual risk, ownership, evidence, review date and escalation route. The assessment must consider both financial impact and student impact, including whether a risk could affect student funding, continuation, complaints, academic progress, wellbeing, confidence or the accuracy of information provided to students and partners.

<b>Risk level</b>	<b>Meaning</b>	<b>Expected response</b>
Low	Isolated or unlikely risk, managed by normal checks and routine controls.	Departmental owners monitor and report through normal committee routes.
Medium	Credible risk, recurring weakness, control gap or concern requiring active mitigation.	Named owner, action plan, evidence of completion and reporting to the Senior Management Committee or relevant committee.
High	Material risk, suspected fraud, significant control failure, regulatory exposure or possible student impact.	Immediate escalation to Senior Management Committee, Risk/Audit route and Board of Directors as appropriate; fraud response plan activated.

Risk reviews are informed by audit findings, finance checks, registry data checks, complaints, whistleblowing reports, student feedback, supplier reviews, external regulatory changes, Liverpool Hope University partnership communications and lessons learned from incidents or near misses.

## **10. Student Data, Attendance, Engagement and Funding Integrity**

Student data integrity is a central part of fraud prevention. Enrolment, attendance, engagement, progression, completion, withdrawal and interruption records may affect tuition fee payments, Student Loans Company records, Liverpool Hope University reporting, OfS data requirements, student support arrangements and Belmont College's public accountability. Belmont College therefore treats deliberate or reckless misreporting of student data as a serious governance and public funds matter.

Registry, admissions, academic and student support teams maintain accurate records in accordance with approved processes (*RAP1 Belmont College Recruitment, Selection and Admission Policy; LTP9 Belmont College Attendance, Retention and Submissions Policy; QGP1 Belmont College Quality Handbook*). Staff must not retrospectively alter records without a clear audit trail, authorisation and evidence. Where corrections are required, the reason for correction must be recorded.

Controls for student data and funding integrity include:

- identity, eligibility and admissions evidence checks before enrolment and where concerns arise;
- clear rules for recording attendance, engagement, authorised absence, interruption, withdrawal and completion;
- periodic reconciliation between teaching records, attendance records, student support records, registry records and any information submitted to Liverpool Hope University or funding bodies;
- review of unusual patterns such as repeated late attendance entry, manual overrides, unexpected continuation changes, non-engagement despite active funding or inconsistent records across systems;
- clear escalation where staff suspect falsified documents, fraudulent student finance activity, identity issues, collusion or pressure to alter records;
- student communications that explain the importance of truthful information and the consequences of dishonest claims or false documents.

Where student data relates to Liverpool Hope University provision, Belmont College follows applicable Liverpool Hope University requirements and partnership reporting routes. Concerns that may affect a Liverpool Hope University award, student contract, data return or funding route must be escalated to the Head of Quality and Operations and the relevant Liverpool Hope University contact in accordance with partnership arrangements (*LHU QH8 Liverpool Hope University Academic Partnership Handbook; LHU Liverpool Hope University Academic Regulations*).

## **11. Procurement, Payments, Expenses, Gifts and Conflicts of Interest**

Procurement and payment activity must be fair, transparent and supported by evidence. Staff must use approved suppliers and approved procurement routes wherever required, and must not split purchases, alter specifications, conceal supplier relationships or approve expenditure in which they have an undeclared interest. Procurement decisions must be based on legitimate business need, quality, value for money, student interests, sustainability where relevant, and compliance with Belmont College Financial Regulation Policy.

Conflicts of interest must be declared promptly and managed before decisions are made. This includes personal, family, financial, employment, business, academic or other relationships that could influence, or appear to influence, decisions relating to suppliers, recruitment, admissions, assessment, employment, partnerships, consultancy, contracts, payments or use of Belmont College resources. The requirements for declaring and managing conflicts are set out in the *(QGP7 Belmont College Conflict of Interest Policy)*.

Gifts, hospitality and inducements must never influence decisions or create an appearance of improper influence. Staff, directors and third parties must not offer, solicit or accept bribes, kickbacks, excessive hospitality or improper benefits. Any gifts or hospitality that are permitted under Belmont College rules must be recorded, proportionate and transparent. Bribery or corruption concerns must be reported immediately and may be handled under this policy, the *(BCP5 Belmont College Anti-Bribery and Corruption Policy)*, the *(QGP8 Belmont College Whistleblowing and Public Concern Policy)*, the *(QGP7 Belmont College Conflict of Interest Policy)*, or the *(HRP3 Belmont College Staff Grievance and Disciplinary Policy)* as appropriate.

Expenses and purchasing card activity, where used, must be supported by receipts, business purpose, approval and compliance with Belmont College rules. Personal expenditure must not be charged to Belmont College. Any accidental personal expenditure must be reported and repaid promptly. Repeated or intentional misuse is treated as a serious matter.

## **12. Partnership, Awarding Body and Third-Party Arrangements**

Partnership and third-party arrangements can create additional fraud and public funding risks because responsibilities may be shared across organisations. Belmont College therefore ensures that financial controls, reporting lines, data responsibilities, audit rights, student protection responsibilities and escalation routes are understood before and during partnership activity.

Bellmont College currently delivers relevant higher education provision in collaboration with Liverpool Hope University. This partnership context is important for fraud prevention because some student, academic, financial, data and quality responsibilities may involve both organisations. Belmont College must not take unilateral action that

conflicts with Liverpool Hope University regulations, student contract requirements or partnership obligations where those requirements apply.

Where suspected fraud, misreporting, bribery, student finance irregularity, data concern, supplier issue or inappropriate use of funds relates to Liverpool Hope University provision, Belmont College:

- secure relevant Belmont College records and evidence immediately;
- notify the appropriate Belmont College senior owner and, where required, the relevant Liverpool Hope University contact through the partnership route;
- clarify which organisation leads any investigation, academic action, student communication, data correction or external notification;
- avoid taking unilateral action that conflicts with Liverpool Hope University regulations, student contract requirements or partnership obligations;
- ensure that students receive clear and accurate information where their studies, funding, records or support may be affected;
- record actions, decisions, communications and evidence for committee oversight and audit.

Contracts with consultants, subcontractors, suppliers or service providers should include proportionate fraud prevention, anti-bribery, data protection, audit, conflict of interest, confidentiality, termination and cooperation requirements. Belmont College does not use third parties to do anything that Belmont College could not lawfully or ethically do itself.

### **13. Reporting, Whistleblowing and Protection from Victimisation**

Belmont College encourages a culture of openness and accountability. Staff, students, directors, contractors, suppliers, partners and third parties should report any reasonable suspicion of fraud, bribery, corruption, financial misstatement, data manipulation, inappropriate use of public funds, conflicts of interest or conduct that could put public funds or student interests at risk.

Concerns may be reported through line management, the Head of Quality and Operations, the Chief Executive Officer, the Chair of the Board of Directors, Finance and Compliance functions, or the confidential route set out in the (*QGP8 Belmont College Whistleblowing and Public Concern Policy*). Where the concern involves the normal reporting line, or where a person reasonably fears that reporting through normal routes would be inappropriate, the concern should be raised through an alternative senior or whistleblowing route.

A report should include as much factual information as reasonably available, such as what happened, who was involved, dates, amounts, records, systems, witnesses, documents and why the matter appears irregular. A person reporting a concern should not carry out their own investigation, contact suspected individuals unnecessarily, remove original documents without authority, or place themselves or others at risk.

Bellmont College does not tolerate victimisation, retaliation or detrimental treatment against a person who raises a genuine concern, participates in an investigation or refuses to participate in fraudulent activity. Malicious or knowingly false allegations may be addressed through the relevant disciplinary or conduct route, but concerns raised in good faith are treated seriously even if they are not ultimately substantiated.

#### **14. Investigation, Stop Actions, Recovery and External Notification**

All reported concerns are assessed promptly to determine the appropriate response. The initial assessment considers whether the matter appears to be error, control weakness, misconduct, suspected fraud, bribery, data breach, safeguarding concern, student conduct matter, staff disciplinary matter, contract issue or regulatory incident. Belmont College preserves evidence, protect confidentiality, consider conflicts of interest and decide whether immediate stop action is required.

Immediate stop actions may include pausing payment, freezing a supplier change, suspending a data submission, requiring a second review of student status, disabling system access, securing physical or digital evidence, pausing a procurement decision, withholding approval, or escalating to Liverpool Hope University or another relevant partner. Stop actions must be proportionate and must not be used as a disciplinary sanction before the facts have been established.

Where a formal investigation is required, the Senior Management Committee agrees the terms of reference, investigator or investigation panel, reporting route, evidence requirements, timescale and communication arrangements. Investigations must be fair, impartial, evidence-based and proportionate. Where necessary, Belmont College may seek legal advice, audit support, specialist financial advice, IT forensic support, human resources advice or guidance from Liverpool Hope University or external bodies.

An investigation may lead to one or more outcomes, including:

- no further action where the concern is not substantiated;
- correction of an error, record, payment or claim;
- strengthening of controls, training or procedures;
- disciplinary action under the (*HRP3 Belmont College Staff Grievance and Disciplinary Policy*) or other applicable staff procedure;
- student conduct or academic integrity action under the relevant procedure, such as the (*LTP6 Belmont College Academic Integrity and Misconduct Policy*) or Liverpool Hope University academic regulations where applicable (*LHU Liverpool Hope University Academic Regulations*);
- supplier, contractor or partner action, including contract review, suspension, termination or recovery of funds;
- financial recovery, repayment, credit note, insurance notification or restitution where appropriate;

- notification to Liverpool Hope University, the Student Loans Company, the OfS, auditors, insurers, police, Action Fraud, HMRC, funders, regulators or other external bodies where required or justified;
- student protection measures where students may be affected.

Bellmont College maintains an investigation record including the report, evidence, decisions, stop actions, recovery action, notifications, control improvements and committee assurance. Lessons learned are reported to the relevant committee and tracked until completion.

## **15. Student Protection, Communications and Consumer Fairness**

Fraud prevention and public funding controls must protect students as well as public money. If a fraud concern, funding investigation, data correction, partnership issue, system issue or regulatory notification could materially affect students, Belmont College assesses student impact and take steps to minimise disruption. Students should not be unfairly disadvantaged by internal failures, unclear communications, delayed corrections or partnership transition.

Where students are affected, Belmont College considers the need for clear communication, academic support, financial guidance, student support, wellbeing support, complaint routes, transfer or continuation arrangements, and coordination with Liverpool Hope University where Liverpool Hope University provision is involved (*CAP1 Belmont College Student Protection Plan and Policy; CAP2 Belmont College Consumer Protection Policy and Implementation Framework; CAP3 Belmont College Complaint and Appeal Policy and Procedure*).

Student-facing communications about financial matters must be accurate, accessible and consistent. This includes information about fees, approved payment routes, cancellation, refunds, additional costs, funding evidence, attendance expectations and the consequences of false information. If fraudulent third-party activity, fee scams or fake payment instructions are suspected, Belmont College communicates promptly through official channels and direct students to appropriate support.

## **16. Data Protection, Confidentiality, Equality and Safeguarding**

Fraud prevention and investigation activity often involves personal data, including student records, staff information, financial records, bank details, attendance records, whistleblowing reports, safeguarding information, equality information, emails, system logs and investigation notes. Belmont College processes such data lawfully, fairly, transparently and securely in accordance with the (BCP7 Belmont College General Data Protection & Regulation (GDPR) Policy) and applicable data protection law.

Access to investigation information is limited to those who need it for assessment, investigation, decision-making, reporting, legal compliance, audit or student protection purposes. Records must be stored securely and retained in accordance with approved retention requirements. Where a personal data breach may have occurred, the Data Protection Officer must be involved promptly.

Bellmont College ensures that reporting, investigation and support arrangements are accessible and non-discriminatory. Reasonable adjustments are made where disabled students, staff or witnesses require them, and the impact on people with protected characteristics is considered where decisions may affect access, participation, support, disciplinary outcomes or student continuation (*SWP2 Belmont College Equality, Diversity and Inclusion Policy; SWP1 Belmont College Reasonable Adjustment and Special Considerations Policy*).

Where financial concerns involve vulnerability, exploitation, coercion, criminal influence, domestic abuse, radicalisation, mental health concerns or student welfare, Belmont College considers safeguarding and wellbeing routes in addition to financial investigation routes (*HSP1 Belmont College Safeguarding and PREVENT Policy; SWP4 Belmont College Mental Health and Wellbeing Policy*).

### **17. Training, Awareness and Culture**

Bellmont College maintains proportionate training and awareness so that staff understand their responsibilities in preventing, detecting and stopping fraud and inappropriate use of public funds. Training is role-appropriate. Staff with responsibilities for finance, registry, admissions, data returns, procurement, student support, quality assurance, IT, partnership liaison or senior governance receive more detailed guidance than staff with limited exposure to public funds or student data.

Training and awareness activity may include induction, policy briefings, refresher guidance, staff development sessions, targeted finance or registry training, fraud indicators, reporting routes, case studies, data quality checks, student scam awareness and guidance on conflicts, gifts and hospitality. Training records are retained and reviewed through the implementation and monitoring process.

Managers are responsible for making sure staff know which controls apply to their role and how to escalate concerns. A culture of prevention depends on staff feeling able to ask questions early, admit mistakes promptly and challenge pressure to bypass controls.

### **18. Implementation Framework**

The policy is implemented through named ownership, routine controls, evidence retention and committee reporting. The table below summarises the practical implementation framework used to show that the policy is working in practice.

<b>Implementation area</b>	<b>Owner</b>	<b>Frequency</b>	<b>Evidence</b>
Fraud risk and E8 control mapping	Head of Quality and Operations with Senior Management Committee	At least annually and when risks change	Risk register, control map, action tracker, committee report

Finance and procurement controls	Finance lead / designated finance personnel	Routine; formal review at least termly	Approval records, reconciliations, procurement files, exception log
Student data and funding integrity checks	Head of Professional Services / Registry with Head of Academic Programmes	At each key enrolment, attendance, submission or reporting cycle	Admission files, attendance data, reconciliation record, submission sign-off
Gifts, hospitality and conflicts monitoring	Head of Quality and Operations / relevant managers	Termly or more often where risk is high	Declaration registers, approval records, recusal notes
Whistleblowing and concerns management	CEO / Head of Quality and Operations / Chair of Board where appropriate	When concerns arise; thematic review at least annually	Concern log, triage notes, investigation records, anonymised reports
Training and awareness	Senior Management Committee and line managers	Induction and periodic refreshers	Training materials, attendance logs, staff briefings
Partnership escalation	Head of Quality and Operations and relevant senior owner	When relevant concern arises; routine partnership review	Liverpool Hope University communications, action logs, meeting notes
Board assurance	CEO / Board of Directors	At least annually and for serious matters	Board report, minutes, approval record, completed actions

## 19. Governance and Committee Oversight

Bellmont College's governance framework provides the oversight route for implementing, monitoring and reviewing this policy. Operational delivery is managed by academic and professional services teams; quality, student data and regulatory risks are reported through the relevant committees; and strategic, financial, regulatory or high-risk matters are escalated to the Senior Management Committee and Board of Directors. This route reflects Belmont College's governance model (*QGP2 Belmont College Management, Committee Structure, Organogram and Terms of Reference; QGP1 Belmont College Quality Handbook*).

Committee / Body	How it implements and monitors this policy
Board of Directors	Maintains strategic oversight of public funds, public trust, student interests, regulatory compliance, serious incident learning and approval of this policy.
Audit and Risk Committee	Advises the Board of Directors on audit, internal control, risk management, financial sustainability, fraud risk, public funding assurance, control gaps and action completion.
Academic Committee	Acts as the academic authority and receives assurance where fraud, data manipulation or inappropriate use of funds may affect academic standards, assessment, student outcomes or partner academic responsibilities.
Senior Management Committee	Coordinates implementation, resourcing, cross-college action, immediate response to serious concerns and escalation to the Board of Directors or external bodies where required.
Quality Committee	Monitors academic quality, complaints and appeals themes, student voice, annual monitoring, action plans, assessment administration and quality enhancement.
Learning and Teaching Committee	Considers academic delivery, assessment, feedback, student engagement and staff development themes arising from fraud or public funding risks.
Recruitment, Admissions and Registry Committee	Monitors admissions, eligibility, student records, attendance, retention, registry data and data integrity controls.
Student Staff Committee	Provides a student voice route for concerns about fairness, communication, fees, payment routes or student-facing information without handling confidential investigations.
Liverpool Hope University partnership routes	Are used where concerns affect collaborative provision, partner academic responsibilities, student records, awards, complaints, appeals, student protection or shared information.

For Liverpool Hope University provision, relevant matters are also considered through the appropriate partnership route. Belmont College reports outputs, action logs, risks,

student support issues, data issues, assessment matters and external feedback into its own committees so that local actions are tracked and completed.

## 20. Roles and Responsibilities

Role / Body	Responsibility
Board of Directors	Retains ultimate governance oversight of public funds, public trust, risk assurance, regulatory compliance, student interests and the effectiveness of fraud and public funding controls.
CEO	Holds executive accountability for implementation, resourcing, serious concern escalation, external notification where required and assurance to the Board of Directors.
Head of Quality and Operations	Coordinates policy implementation, OfS E8 monitoring, quality assurance, committee reporting, risk monitoring, public information review, partnership liaison and evidence gathering.
Finance lead and designated finance personnel	Maintain financial controls, reconciliations, payment checks, procurement evidence, budget monitoring, supplier records and escalation of irregularities.
Head of Academic Programmes	Ensures academic delivery, assessment records, module activity, attendance, engagement and academic data are accurate and that academic staff escalate data or funding concerns.
Head of Professional Services	Oversees admissions, registry, student support, finance communications, applicant information, enrolment processes and operational services that support accurate records and fair treatment.
Head of IT and Human Resources	Supports system access controls, cybersecurity incident coordination, audit logs, secure evidence preservation, staff development and staff conduct processes.
Programme Coordinators and Module Tutors	Maintain accurate teaching, attendance, engagement and assessment records, identify unusual patterns and escalate issues affecting funding integrity, academic standards or student interests.

Student Support staff	Support students affected by scams, financial hardship, vulnerability, coercion, wellbeing concerns, safeguarding issues or confusion about fees and official payment routes.
Data Protection Officer	Advises on lawful, fair and secure processing of personal data in fraud prevention, reporting, investigations, audit, student communications and external notifications.
All staff	Act honestly, follow controls, keep accurate records, protect Belmont College assets, report concerns promptly and cooperate with investigations.
Students	Provide truthful information, use approved payment routes, protect accounts and personal data, report suspicious requests and cooperate with reasonable checks.
Contractors, consultants, suppliers and partners	Act honestly, comply with contracts, declare conflicts, cooperate with audit and investigation requirements, protect data and report concerns relating to Belmont College funds or students.
Liverpool Hope University	Retains responsibility for matters reserved to it under collaborative provision and cooperates with Belmont College where concerns affect shared records, funding integrity, academic responsibilities or student protection.

**21. Monitoring, Reporting, Audit, Evidence and Review**

This policy is monitored through routine evidence checks, audit or assurance activity, risk register review, finance checks, procurement checks, admissions checks, student data checks, attendance and engagement reconciliation, training records, complaints, whistleblowing themes, partner feedback, committee action tracking and annual policy review.

Evidence of implementation may include completed risk assessments, control maps, declaration forms, gifts and hospitality registers, conflict declarations, supplier due diligence files, contract records, invoice approvals, reconciliations, student admissions evidence, attendance records, funding submission sign-offs, student status correction logs, whistleblowing logs, investigation outcomes, anonymised committee reports, risk register entries, staff training records and policy review records.

Monitoring considers whether controls are proportionate for Belmont College’s size, activities and risks. Belmont College avoids unnecessary bureaucracy where a risk is low, but strengthens checks where a decision affects public funds, admissions,

attendance, engagement, student outcomes, partner responsibilities, procurement, regulatory evidence or senior governance.

The Head of Quality and Operations coordinates review of this policy at least annually, or earlier where legislation, OfS requirements, CMA expectations, Liverpool Hope University requirements, awarding-body arrangements, serious incidents, audit findings, student feedback, committee scrutiny or institutional risks indicate that review is needed. Proposed revisions are considered through the appropriate governance route and approved by the CEO / Board of Directors as required.

## 22. Conclusion

This policy gives Belmont College a clear, proportionate and practical framework for preventing, detecting, stopping and responding to fraud and inappropriate use of public funds. It recognises Belmont College’s current Liverpool Hope University partnership, future OfS funding development, while setting standards that are strong enough to protect students, staff, public funds, partner responsibilities, academic standards and institutional reputation.

The policy confirms that E8 compliance is not only a matter of having written policies. It requires operational controls, trained staff, accurate records, risk assessment, active detection, prompt stop action, fair investigation, committee oversight and evidence that improvements are completed. Through this approach, Belmont College protects public funds and student interests while maintaining a culture of honesty, transparency and accountability.

<b>Bellmont College Fraud and Inappropriate Use of Public Funds Policy</b>					
<b>Version</b>	<b>Date</b>	<b>Author(s)</b>	<b>Amendments</b>	<b>Approved by</b>	<b>Next review</b>
1	March 2026	Head of Quality and Operations	New Document	Board of Directors	March 2027