Anti Fraud and Corruption Policy

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1. Introduction

1.1. University College Cork (UCC) is committed to conducting all its business in an honest and ethical manner and has a zero tolerance policy towards Fraud and Corruption.

1.2. UCC's values are represented in the mnemonic *CAIRDEAS*, the Irish for 'friendship', as they underpin our relationships and engagement with the local and global UCC community and all our partners:

Compassion
Agility
Integrity
Respect
Discovery
Equity
Accountability
Sustainability

1.3. These values underpin this policy and the related procedure.

2. Purpose

2.1. The purpose of this policy is to:

- promote a culture of honesty, integrity and professionalism in line with our University values by setting out the University's position on Fraud and Corruption;
- provide guidance on recognising what constitutes Fraud and Corruption and provide guidance to Members of the University on how to address suspicions of Fraud and/ or Corruption activities; and
- set out the responsibilities of the University and of those working on behalf of the University in observing and upholding the University's position on Fraud, bribery and Corruption.

2.2. The Fraud and Corruption Response Procedure operationalises this policy and sets out the steps that should be followed in the event of alleged Fraud and/or Corruption. The Fraud and Corruption Response Procedure is available on the UCC website - www.ucc.ie/en/ocla/policy/afcpp/procedure

3. Definitions

3.1. In this policy, the following capitalised terms (which are used throughout this policy) will have the following meanings:

Fraud

3.2. For the purpose of this policy, Fraud is any dishonest act or omission, carried out deliberately or recklessly, that results in loss to the University, the avoidance of an obligation or the obtaining of a benefit or advantage (whether for the person acting or omitting to act or for a third party). Fraud also includes attempted Fraud. While it is not possible to list all categories of Fraud, some categories include:

- misappropriation of assets;
- financial Fraud including misrepresentation of expense claims;
- computer Fraud;
- bribery and Corruption;
- supplier Fraud;

- time Fraud.

Corruption

3.3. Corruption means the abuse of entrusted power, position or authority, including the direct or indirect offering of, seeking or accepting inducements, gifts, favours, payment or benefits in kind which may improperly influence the action of any person in relation to their office of employment, position or business. Favouritism and/ or nepotism also constitute corruption.

3.4. The corrupt person need not benefit directly from their deed; they may unreasonably use their position to secure or influence some advantage to another. Not reasonably taking action to prevent Corruption, also amounts to Corruption.

Member of UCC

3.5. This policy is a University wide Policy which applies to all “Members” of UCC who, in accordance with the University Statutes, are defined as:

- Members of the Governing Authority;
- Members of the Academic Council;
- University employees;
- University students;
- any other person the Governing Authority may appoint to be Members.

3.6. For the purpose of this policy, it also includes any volunteer or service provider participating or engaged in UCC arranged activity or service provision to the University, and any Members of the Governing Authority Committees who are external to the Governing Authority.

4. Scope

4.1. This policy applies to all units of the University. These are all hereinafter collectively referred to as the ‘University’.

4.2. Allegations of a breach of research integrity will be dealt with in accordance with the Code of Research Conduct and University Statutes when appropriate.[1]

4.3. This policy does not apply to allegations of academic misconduct which are dealt with under other policies and procedures.

4.4. The University has a Disclosures Policy which Members must familiarise themselves with.

5. Policy Statement

5.1. UCC does not tolerate Fraud or attempted Fraud, Corruption or attempted Corruption. UCC will continue to take steps to prevent and detect Fraud and/or Corruption, increase awareness of Fraud and Corruption amongst staff and other stakeholders, and create a culture where the reporting of suspicions of Fraud and/or Corruption is encouraged and expected.

General Principles

5.2. It is the policy of the University to promote a culture of integrity and honesty and to safeguard the University’s resources by ensuring that opportunities for Fraud and/or Corruption are reduced to the lowest possible level of risk through the following:

[1] For further guidance please see https://www.ucc.ie/en/research/culture/integrity/

- operating an effective system of internal control which functions as intended;
- promoting the necessity and requirement for high standards of personal conduct amongst Members of the University through development and implementation of relevant policies and procedures;
- ensuring the appropriate segregation of duties across the University;
- delegating approval authority across a range of personnel;
- promoting a culture of transparency;
- ensuring that appropriate management resources and structures are in place across the University to detect any incidences of Fraud and/or Corruption;
- timely appropriate management of any allegation of Fraud and/or Corruption in accordance with relevant University policies and procedures;
- equal and fair treatment of all University Members who become the subject of a Fraud and/or Corruption allegation.

5.3. Members of the University are required to act reasonably and in good faith, in reporting alleged Fraud and/or Corruption and commit to keeping the reporting and investigation of suspected Fraud and/or Corruption confidential in accordance with the terms of the Anti-Fraud and Corruption Policy and the Fraud and Corruption Response Procedure. It is important that all evidence is preserved and protected from the outset.

6. Responsibilities

Governing Authority

6.1. Governing Authority is responsible for oversight of the use of University funds and resources and for approving this Policy.

Audit and Risk Committee

6.2. The Audit and Risk Committee (ARC) will receive a copy of the Fraud Response Panel final report and will advise Governing Authority in relation to fraud reported to the ARC.

6.3. The ARC will, at an appropriate time, consider the recommendations (if any) listed in the Fraud Response Panel's final report and whether they have been implemented, as appropriate.

President

6.4. The President ensures that this Policy is implemented across the University and delegates responsibility for implementation of specific elements of the Policy to members of the University Leadership Team.

Members of the University Leadership Team (ULT)

6.5. ULT members are responsible for:

- ensuring staff in their area are aware of this policy and their responsibilities under it;
- ensuring the implementation of this policy within their areas;
- being alert to the possibility for Fraud and/or Corruption; and
- establishing and implementing controls to prevent and detect Fraud and/or Corruption.

Management

6.6. It is the responsibility of managers to promote a culture of integrity and ethical behaviour throughout the University, including when dealing with contractors and third parties delivering services to or on behalf of the University and specifically in relation to monitoring activities and minimisation of the risk of Fraud and/or Corruption in relation to University assets.

6.7. Managers are responsible for:

- determining controls and preventative measures to combat Fraud and/or Corruption.
- ensuring staff are familiar with this policy;
- assessing the types of risk involved in the operations for which they are responsible in accordance with the Risk Management Policy;
- ensuring that adequate systems of controls are in place and functioning correctly;
- ensuring appropriate management controls are in place to avoid undue reliance on any particular individual, e.g. double check system, where appropriate and in line with UCC policies.

Head of Internal Audit

6.8. The Head of Internal Audit will normally Chair the Fraud Response Panel

6.9. The Head of Internal Audit will be responsible for submitting a copy of the final report of the Fraud Response Panel to the ARC.

Fraud Response Panel

6.10. The Fraud Response Panel will be responsible for the handling and assessing of all allegations of Fraud and/or Corruption in a timely and appropriate manner in accordance with the Fraud and Corruption Response Procedure. The membership of the Fraud Response Panel is set out in the Fraud and Corruption Response Procedure.

Corporate Secretary

6.11. The Corporate Secretary will be responsible for all relevant legal and regulatory reporting requirements to external agencies applicable to the University in the circumstances.

University Members

6.12. Every member is responsible for:

- operating in accordance with this policy;
- the timely reporting of suspicions of Fraud and/or Corruption in line with the reporting procedure set out in the Fraud and Corruption Response Procedure available on the UCC website - www.ucc.ie/en/ocla/policy/afcpp/procedure
- full co-operation with any University audit, review or investigation.

7. Sanctions

7.1. Any member of the University who is found to have breached this policy may be subject to the relevant disciplinary procedures in accordance with University policies and procedures.

7.2. Persons reporting suspected Fraud or Corruption knowing it to be false may be subject to disciplinary action.

7.3. Persons who threaten retaliation against a person reporting suspected Fraud or Corruption may be subject to disciplinary action.

7.4. Persons who attempt to cover up, obstruct, fail to report or monitor Fraud and/or Corruption that they become aware of, will be considered to be an accessory after the fact and may be subject to disciplinary action.

8. Supporting Policies and Procedures

8.1. Supporting policies and procedures include, but are not limited to:

- Fraud and Corruption Response procedure;
- Code of Conduct – Governing Authority Members;
- Code of Conduct for Employees;
- Conflict of Interest Policy;
- Disclosures Policy;
- Hospitality and Gift Policy;
- Student Rules.

9. Policy Review and version control

9.1. This policy will be reviewed at least once every four years, and as soon as possible after any legislative or other relevant developments.

Table 1: Anti Fraud Policy Control Table

Policy Name	Anti Fraud and Corruption Policy
Version	2.0
Policy Owner	Office of Corporate and Legal Affairs
Consultation and Approval Pathway	Version 1.0 UMTO 24.03.14 Audit Committee 14.04.14 Final Approval Governing Body 15.04.14 Version 2.0 ULT: 29.04.26 Audit and Risk Committee: 30.04.26 Final Approval Governing Authority: 12 May 2026
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