



Review and update of Policies – 2018

Outcome requested:	<p>Council is asked to approve updates to the following policies and procedures, on the recommendation of the Audit and Risk Committee:</p> <ul style="list-style-type: none">• Standards of Business Conduct• Fraud and Corruption Policy and Response Plan• Anti Bribery and Corruption Policy• Anti Money Laundering and Criminal Finances Act Policy• Public Interest Disclosure Policy
Executive Summary:	<p>The policies have been updated to reflect the following:</p> <ol style="list-style-type: none">1. Standards of Business Conduct<ul style="list-style-type: none">• The current version on the Policy Zone, last approved by the Audit and Risk Committee in 2014, has been updated to reflect references to QMUL from “the College” and Appendix A references to CIPS Code of Ethics2. Fraud and Corruption Policy and Response Plan<ul style="list-style-type: none">• The current version on the Policy Zone dated 2014, has been updated to reflect references to QMUL from “the College”• Appendices containing the full disciplinary Ordinance have been removed and a reference to the policies included (removing 13 pages from this policy)3. Anti Bribery and Corruption Policy<ul style="list-style-type: none">• The current version on the Policy Zone last approved by Council 2014, has been updated to reflect references to QMUL from “the College”.• The inclusion of references to training in sections 1.5; 4.3 and 11.1 and completion of this training to be monitored by School/Institute Managers and Professional Services Directors4. Anti Money Laundering and Criminal Finances Act Policy<ul style="list-style-type: none">• The current version on the Policy Zone last approved by Council in 2014, has been updated to reflect references to QMUL from “the College”.• The incorporation of the Criminal Finances Act which came into force in September 2017• Introduced a cap on levels of cash that QMUL will receive to £10k5. Public Interest Disclosure Policy<ul style="list-style-type: none">• Changed the route for making a disclosure (normally to the Academic Registrar and Council Secretary, rather than the President and Principal) and clarified who will normally be informed.

	<ul style="list-style-type: none"> • Added clearer signposting to the Safeguarding Policy and Procedures, the Prevent duty and the Criminal Finances Act 2017. • Added signposting to external sources of advice for potential whistle blowers. • Clarified the definitions of 'detrimental treatment' and 'vexatious allegations'. • Added clarification that the policy does not form part of the contract of employment and can be amended at any time (paragraph 2.4). <p>It is also recommended to re-set the review date to 3 years for these policies/procedures, to provide consistency and alignment across the documents going forward.</p> <p>Copies of the policies are included in the additional reading for Council members.</p>
QMUL Strategy:	Strategic Aim 6: to achieve and sustain financial strength to enable our academic ambitions, through a balanced portfolio of activities.
Internal/External regulatory/statutory reference points:	Internal Policies and Regulations External Statutory Requirements
Strategic Risks:	11 – Sustainable income streams. 12 – Cost control, VfM and expenditure
Equality Impact Assessment:	Not required – updates to policies are minor in nature.
Subject to prior and onward consideration by:	QMSE 27 February 2018 Audit and Risk Committee 8 March 2018
Confidential paper under FOIA/DPA	No
Timing:	These policies are reviewed every three years unless applicable law or regulation necessitates earlier review. The policies will apply from the date of Council approval, provisionally 13 April 2018.
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