



Anti-Fraud and Corruption Policy

Date Implemented: 1 September 2023

Date Last Reviewed: August 2024

Date Governing Body Approved: September 2024

Review Period: Every 2 years

Staff Responsibility: Manda Sides

Date for Next Review: August 2026

Anti-Fraud and Corruption Policy

The Governors are committed to fighting fraud with high ethical and moral standards and recognise that any fraud perpetrated against the federation is costly, both in financial terms and reputation. The governors are therefore committed to take action to prevent, detect and deter fraud, corruption and bribery in all its activities.

This policy must be read in conjunction with the Anti-Bribery Policy, Whistleblowing Policy and the Schedule of Financial delegation.

The Federation will ensure probity in administration and governance by taking positive action against all forms of fraud, corruption or bribery affecting school business whether it is from internal or external sources.

The Governing Body will ensure its policy is communicated to staff and the wider school community.

Paper copy signed and dated

Paper copy signed and dated



Ian Dignum, Chair of Governors

Stephen Hoult-Allen, Executive Head

Date: September 2024

Date: September 2024

Changes since last version: No changes required except date for review.

Section	Details of change

1. Introduction

This policy applies to all employees, governors and other individuals performing functions in relation to the organisation, such as agency workers and contractors.

It is important to the federation that there are proper procedures in place to guard against fraud and corruption and ensure best use of public funds. If there are any concerns that cannot be raised through the normal channels, then the Whistleblowing policy should be followed.

This procedure has been adopted from HCC's which has been drawn up in consultation with the Professional Associations and Trade Unions.

2. Background

The Department for Education's (DfE) Scheme for Financing Schools (March 2018) includes the following provision, at paragraph 2.17 –

“All schools must have a robust system of controls to safeguard themselves against fraudulent or improper use of public money and assets.

The governing body and executive head must inform all staff of school policies and procedures related to fraud and theft, the controls in place to prevent them; and the consequences of breaching these controls. This information must also be included in induction for new school staff and governors.”

In addition, when completing the School's Financial Value Standard the governors are asked if there are adequate arrangements in place to guard against fraud and theft by staff, contractors and suppliers and note any instance of fraud or theft detected in the last 12 months.

This policy document assists the Governing Body in meeting these requirements.

Fraud is a criminal offence. The Fraud Act 2006 defines 'fraud' as:

1. Deceit, the intention to deceive or secrecy; and
2. (a) an actual loss or gain;
(b) The intent to cause loss to another or expose them to the risk of it;
3. Dishonesty.

Offences of fraud can include abuse of position, making of a false statement, failure to disclose information, obtaining services dishonestly, deception, theft, misappropriation, embezzlement, forgery, corruption, extortion, false accounting, false representation, concealment of material facts, acts of conspiracy, collusion and aiding and abetting any act of dishonesty.

Bribery is a criminal offence and the Bribery Act 2010 introduces a clearer regime for tackling bribery. A definition is – inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages.

The school has An Anti-Bribery Policy and procedure which can be referred to for further detail / reference.

3. Policy

The Governing Body has a legal responsibility for the schools budgets and will ensure a sound system of internal control is in place in the use of delegated and other funds given to the schools in the federation.

The Executive Head and the Senior Leadership team are responsible for ensuring that there are sound systems of financial control designed to minimise the risk of fraud or error.

All federation staff are expected to report any cases of suspected fraud, no matter how trivial they may seem either to their manager, through the whistleblowing process or to the Shared Anti-Fraud Service.

All staff are expected to be fully accountable during their employment with the federation, to follow the federation's policies, financial procedures and any relevant professional code and to comply with all laws and regulations applicable to the federation's business.

As stewards of public funds, staff must have, and be seen to have, high standards of personal integrity. Staff should not accept personal gifts, hospitality, or benefits of any kind from a third party that may be seen to compromise that integrity.

Internal Audit (Shared Internal Audit Service) will report on the existence and effectiveness of control systems and as part of the audit process may advise on best practice. The findings and recommendations of reports will be implemented promptly.

4. Detection

The Shared Internal Audit Service undertake school audits in accordance with the school audit strategy and report on the effectiveness of the financial controls in the schools visited. The results are available to all schools on the Internal Audit page on the grid http://www.thegrid.org.uk/info/internal_audit/summary_reports.shtml. Any suspected fraud is referred to the Shared Anti-Fraud Service.

5. Investigation

Where any matter that might constitute fraud, theft, corruption or bribery comes to the attention of any governor or member of the federation staff contact should be made with the Executive Head, or one of the governors. A decision will be made to contact either the Shared Internal Audit Service or the Shared Anti-Fraud Service. If the concern is about either the executive head or the governors the advice in the Whistleblowing policy should be followed. The first course of action will be to identify the most suitable person to undertake a preliminary fact-finding investigation. In practice this will normally be the Executive Head.

Subject to the initial findings the matter will then be further investigated by either the Shared Internal Audit (where there are apparent control failures) or the Shared Anti-Fraud Service where there is likely to be an instance of fraud or corruption.

All sensitive material collected in relation to the investigation will be managed in line with the Data Protection Act 2018 and the Federations GDPR Policy.

6. Deterrence

The Governing Body views fraud as a serious offence against the federation and employees will face disciplinary

action if there is evidence to support any allegation of fraud. Disciplinary action may be taken in addition to, any criminal proceedings, depending on the circumstances of each case.

The Governing Body is committed to deterring potential cases of fraud through the implementation of robust systems and procedures and will act quickly and efficiently where fraud is alleged, leading to the most appropriate outcome.

It will take all steps possible to ensure appropriate penalties are sought in cases where fraud is proven, strenuously attempt recovery of any monies lost because of fraud and thoroughly assess the systems and processes to ensure fraud is minimised in future.

Implementation of Fraud Policy

Action	Lead person	Carried out
Governors to abide by the Scheme for Financing Schools, the School's Financial Value Standard (SFVS), the School's Schedule of Financial Delegation and act within the law in an open, honest and trustworthy manner	Monitored by Chair of Governors, Chair of Finance Committee and the Finance Link Governor over the past year.	
Ensure an effective system of internal financial control exists within the school, that it is clearly documented in the school's own Financial Procedures and evidenced by compliance with the SFVS.	Executive Head (with Head of operations assistance and Bursar)	
Take responsibility for reviewing the control systems in place and undertake regular checks for assurance that controls are being correctly applied.	Executive Head in conjunction with Head of Operations	
Ensure recruitment procedures established to ensure all staff are vetted correctly prior to commencing their employment.	Executive Head (assisted by HR Officer)	
Ensure statements of employment or undertaking include reference to the school's Fraud Policy	Executive Head (assisted by HR Officer)	
Ensure Disciplinary procedures are in place to deal any acts of misconduct by school employees.	Chair of Staffing Committee (or similar)	
Inclusion of Fraud policy and Whistle-blowing policy in Staff Handbook	Executive Head (assisted by HR Officer)	
Inclusion of Fraud policy and Whistle-blowing policy in staff induction programmes	Executive Head (assisted by HR Officer)	
Inclusion of Fraud policy and Whistle-blowing policy in governor's induction programmes	Executive Head (assisted by HR Officer)	
Staff should not accept personal gifts, hospitality, or benefits of any kind from a third party that may be seen to compromise their integrity.	Executive Head to maintain a gifts and hospitality register	
Publicise the federation's commitment to fighting fraud, e.g. providing information on its website and school documents, such as the prospectus	Executive Head	

Contacts

Shared Internal Audit Service

Terry Barnett -Head of Assurance Services:

Tel: 01438 845506

Shared Anti-Fraud Service

Nick Jennings –Counter Fraud Manager

Tel: 01438 844705