

# Anti-Fraud and Corruption Policy (CST)

**Last Updated Saturday 14th January 2017**

This policy applies to Mount Street Academy, Lincoln Carlton Academy, Benjamin Adlard Primary School and Kyra Teaching School.

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## 1. Background

Our schools are committed to protecting the public funds entrusted to it so that the maximum amount of resources can be used for their intended purpose. The school has a 'zero tolerance' culture to fraud and it is essential that the risk to the school of financial loss due to fraud, corruption and financial impropriety is minimised.

## 2. Aims of this Policy

The Governors are committed to ensuring that the affairs of the school are conducted in accordance with the highest standards of probity and accountability. As part of this commitment the Governors are committed to combating fraud, corruption and other financial impropriety (e.g. theft) wherever it may arise in relation to any of the school's activities or services. This Policy sets out the School's commitment and responsibilities.

## 3. Definitions

For clarity and transparency the school adopts the following definitions:

**Fraud** is the intentional distortion of financial statements or other records by persons internal or external to the organisation, which is carried out to conceal the misappropriation of assets or otherwise for gain.

Examples of fraud in the context of a school environment could be:

- Falsifying or altering accounting records or other documents
- Suppressing or omitting the effects of transactions from records or documents
- Adding records of transactions which have no substance
- Wilful misrepresentation of transactions or other school affairs

**Corruption** is the offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person.

Examples of corruption in the context of a school environment could be in dealing with:

- Tenders
- Contracts
- Disposal of Assets

*The above represent examples only and do not represent a definitive and exhaustive list*

## 4. Actions to prevent fraud

The school takes the following actions to prevent fraud:

- \* implementing anti-fraud and whistleblowing policies, regularly updating these and communicating them to staff
- \* conducting regular anti-fraud awareness training events for finance staff
- \* highlighting to staff via this policy that they can also contact the EFA with any concerns of possible irregularity or fraud
- \* ensuring management communications to pursue identified incidents of fraud
- \* regularly assessing the school's financial controls and ensuring they are well designed and implemented
- \* ensuring that there is appropriate segregation of duties in the school's controls
- \* regularly reviewing the school's processes for references and background checks on new employees
- \* scrutinising significant business transactions and personal relationships to avoid possible conflicts of interest
- \* installing a physical security system to protect the school's assets

## 5. Responsibilities

Governors and school staff must demonstrate the highest standards of honesty, probity, openness and integrity in the discharge of their functions. This includes

- a) compliance with appropriate legislation, codes of conduct, conditions of service, and any other standards, guidelines or instructions which are relevant to the particular service or activity;
- b) providing a framework within which counter-fraud arrangements will flourish;
- c) promoting an anti fraud and corruption culture within the school.

## 6. Outline of expectations – external relations

The Governors expect that all external individuals and organisations that it deals with, for example suppliers, contractors, partners, service providers, parents and members of the public, will act with honesty and integrity and without thought or actions involving fraud, corruption or financial impropriety.

## 7. Procedures

It is often the alertness of employees and the public to possible fraud and corruption that brings these to light, and the school has in place arrangements to ensure that such information is properly dealt with. These arrangements are set out in the Finance Handbook, Whistle-Blowing Policy and Concerns and Complaints Policy. All of which are available on Lincs Hub. The Concerns and Complaints Policy is also available on all the School websites.

Any employee that suspects fraud or corruption has a duty to report their suspicions, in accordance with the Whistle-Blowing Policy. Staff can also contact the Education Funding Agency (EFA) with any concerns of possible irregularity or fraud.

Where external third parties become aware of or become concerned about the possibility of any fraud and corruption they should report their concerns promptly to the school. In the first instance please contact Carla Wray, School Business Manager.

All reports of suspected fraud or corruption will be formally investigated by the Executive Headteacher/Headteacher, School Business Manager, or Chair of Governors and CST should suspicions relate to these postholders. Advice will be taken from the Governors, CST, external auditors and HR as needed. Although it is inappropriate to apply a standard methodology to every case, the investigating officer will ensure that:

- Each investigation is carried out in a professional and systematic manner
- Each reported case of suspected fraud or corruption is properly managed and directed.

- All matters are recorded adequately
- Appropriate evidence is sought and secured.

The Executive Headteacher/Headteacher, School Business Manager, and others who have information about an investigation will regard it as strictly confidential and will not share that information except in the proper furtherance of the investigation.

Either the Executive Headteacher/Headteacher or School Business Manager, in consultation with the Chair of Governors and CST, will decide whether any matter should be referred to the police for further investigation or whether disciplinary proceedings should be taken against any employee in accordance with established procedures.

The Governors and CST will be informed when an investigation shows that fraud is likely to have occurred, regardless of the size or monetary value involved.

## 8. Communication of the Policy and raising awareness

The school will publicise this policy and its stance on anti fraud and corruption. This policy is publicised on the school's website and is made available to all Governors, employees and other associated bodies/persons with whom the school conducts its business. This policy can be made available in large print or other accessible format if required.

The school will hold regular anti-fraud awareness training events for finance staff, and for other staff as appropriate.

## 9. Arrangements for monitoring and evaluation

The trust will review this policy at least every two years and assess its implementation and effectiveness

The school will monitor awareness of the policy as part of its regular surveys of staff and governors.

Any concerns and the action taken will be documented (with regard to confidentiality) and a summary included in any termly reports to the governors, with advice on any implications for policies and practice.

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Reviewed by: Carla Wray

Provision Committee Review Date: Thursday 01st September 2016

Governing Body Review Date: Thursday 19th January 2017

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