

Bradgate Education Partnership

Anti-Fraud Policy

Applicable to the Bradgate Education Partnership Multi-Academy Trust schools:

Broomfield Primary School
Church Hill Infants Primary School
Eastfield Primary School
Gaddesby Primary School
Great Dalby Primary School
The Merton Primary School
Newtown Linford Primary School
The Pochin School
The Roundhill Academy
Seagrave Village Primary School
Swallowdale Primary School

**Policy Reviewed and Adopted
by MAT Board:**

Version:

1.1 March 2017

Date of Next Review:

March 2020

Responsible Officer:

CFO

ANTI-FRAUD POLICY AND FRAUD RESPONSE PLAN

This policy sets out the strategies for minimising the risk of fraud, corruption and other irregularity and the plan for responding when fraud, corruption or irregularity is suspected.

Definition of Fraud

Although there is no precise legal definition of fraud, the term is used to describe such acts as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. Fraud can occur anywhere within The Pochin School and can present itself not simply as financial or financially motivated but covers areas including financial, reputational, employment and students. This policy covers all of the above.

For practical purposes for the application of this policy, fraud may be defined as the use of deception with the intention of:

- Gaining an advantage, personally and for family or friends; or
- Avoiding an obligation; or
- Causing a financial loss to The Pochin School

ANTI FRAUD POLICY

The Academy Financial Handbook (July 2016 edition, Section 4.8) states that:

Academy trusts must be aware of the risk of fraud, theft and/or irregularity occurring and, as far as possible, address this risk in their internal control and assurance arrangements by putting in place proportionate controls. Trusts must take appropriate action where fraud, theft and/or irregularity is suspected or identified.

The Pochin School's management has responsibility for the prevention, detection and investigation of irregularities. The Leicestershire County Council Internal Audit Service, as Responsible Officer to the Trust, assists by examining and evaluating the adequacy and effectiveness of the actions taken to fulfil this obligation.

Irregularities include:

- fraud, which includes the misappropriation of money and property
- corruption
- financial malpractice
- embezzlement
- serious maladministration
- unethical practices that are not necessarily criminal
- dangerous acts or omissions creating health and safety hazards

The Pochin School's anti-fraud policy has the following components:

1. Financial Regularity Environment

The Pochin School creates an environment in which high standards of probity and accountability are expected. All members of staff have a duty to comply with the regulations and to behave honestly and with integrity, and the school generates amongst its staff a strong awareness of its anti-fraud culture.

2. Policies

Governors and staff must comply with the pecuniary interest policy. They must register their outside interests and do not take part in decisions where they have such an interest.

Clear guidance on the administration of finance and contracts is set out in The Bradgate Education Partnership Financial Regulations Policy.

There is an established Trust Whistle Blowing policy for all schools. This policy encourages staff to voice any reasonably held suspicion as part of an effective anti-fraud culture. This whistle blowing policy sets out the procedure and informs staff of their rights and obligations under the Public Interest Disclosure Act 1998. This legislation will protect employees from any reprisals as long as they meet the following rules:

- they must disclose the information in good faith
- they must believe it to be substantially true
- they must not act maliciously or make false allegations
- they must not seek any personal gain

The Pochin School incorporates recommendations made by the Leicestershire County Council Internal Audit Service to strengthen Pochin School's financial and operational systems of control.

FRAUD RESPONSE PLAN

Purpose:

The purpose of the plan is to define authority levels, responsibilities for action and reporting lines in the event of a suspected fraud or irregularity. The use of the plan is intended to enable The Pochin School to:

- prevent further loss
- establish and secure evidence necessary for criminal and disciplinary action
- notify the funding body, if the circumstances are covered by the mandatory requirements of the Academy Financial Handbook.
- recover losses
- take action against the culprits
- review the reason for the incident, the measures taken to prevent a recurrence and any action needed to strengthen future responses to fraud

- keep all personnel with a need to know suitably informed about the incident and the School's response
- inform the police and establish lines of communications
- assign responsibility for investigating the incident establish circumstances in which external specialists should be involved
- establish a plan for follow on actions, such as the future requests for references for employees involved in the incident

Initiating action:

All actual or suspected incidents should be reported immediately to the Head Teacher. The Head Teacher should then convene a meeting of the project group consisting of the Head Teacher and the Finance Committee. The project group will decide the action to be taken including the need to commission special investigations and the resource implications.

Issues for the project group to consider:

Prevention of future loss:

- this may require the suspension with, or without pay of the suspect
- suspects may need to be escorted from the premises and prevented from gaining future access, including access to the School's computer systems
- internal audit may consider that other related systems or areas should be investigated

Action to be taken against the individual:

The School will follow disciplinary procedures against any member of staff who has committed fraud. The School will normally pursue the prosecution of any such individual.

Notifying the funding body:

The circumstances in which The School must inform the funding body about actual or suspected frauds are detailed in the Academies Financial Handbook.

The Head Teacher is responsible for informing the funding body of any such incidents.

Recovery of loss:

The amount of any loss should be quantified and repayment of losses sought in all cases. Where the loss is substantial legal advice should be obtained without delay.

Reporting to Directors:

Any incident matching the criteria in the Academy Financial Handbook shall be reported without delay by the Head Teacher to the Chair of Governors

and the CFO/Chair of the Trust Finance Audit & Risk (FAR) Committee. Follow up reports updating progress should be provided. Any variation from the approved fraud response plan, together with the reasons for the variations, shall be reported promptly to the Chair Governors and CFO/Chair of the Trust FAR Committee. A written report shall be submitted to the FAR Committee describing the incident, value of loss, individuals involved and the means of perpetrating the fraud, the measures taken to prevent a recurrence and any actions needed to strengthen future responses to fraud.

Review of plan:

The fraud response plan will be reviewed every three years, or after each use. Any need for change will be reported to the FAR Committee for approval.

Review of this policy:

The Trust through its FAR Committee will review this policy every three years. It may however review this policy earlier than this if the government produces new regulations, or if it receives recommendations on how this policy might be improved.

Policy reviewed: May 2017

To be reviewed every three years by the Finance, Audit & Risk Committee

Signed on behalf of the Governing Body.....Chair of Governors

Date:

Next review date: May 2020