

# Anti-Fraud and Corruption Strategy 2022 Policy



<b>Governors Meeting:</b>	<b>21 November 2022</b>
<b>Safeguarding Governor:</b>	<b>Jane Owens</b>
<b>Chair of Governors:</b>	<b>Gail Webb</b>
<b>Review:</b>	<b>21 November 2023</b>

# Huxley CE Primary School

## ANTI-FRAUD AND CORRUPTION STRATEGY

### Anti-Fraud & Corruption Strategy

#### Executive Summary

Sound systems of public accountability are vital to effective management and in maintaining public confidence. **Huxley CE Primary** share these high standards and are committed to protecting the public funds entrusted to it.

The minimisation of losses to fraud and corruption is essential to ensure that resources are used for their intended purpose to provide educational services to the pupils in school.

The Anti-Fraud and Corruption Strategy is based on a series of comprehensive and inter-related procedures, designed to prevent, detect and deter fraud and to take effective action against any attempted or actual fraudulent act affecting the school.

This Strategy outlines the school's commitment to creating an anti-fraud culture, and maintaining high ethical standards in its administration of public funds.

#### Introduction

The school has a responsibility for the provision of effective efficient services to pupils and stakeholders in a manner that seeks to ensure best possible protection of the public purse in its delivery arrangements.

In order to protect these public funds from fraud and corruption, the school is committed to an effective Anti-Fraud and Corruption Strategy that complies with legislation and best practice.

The school's expectation of propriety and accountability is that staff at all levels adhere to statutory and internal rules and regulations, procedures and recommended practices.

The Strategy is designed to advise and guide Governors, Headteachers, Senior Leaders and Employees on the school's approach to the serious issue of fraud and corruption.

It is recognised that fraud can:

- Undermine the standards of public service that the school is attempting to achieve

- Reduce the level of resources and services available to pupils

- Result in major consequences that can reduce public confidence in the school.

#### Scope

This strategy covers all Employees and Governors of the school.

The school also expects that all individuals and organisations with which it comes into contact will act with integrity and without thought or actions involving fraud or corruption.

## Definitions

### What is FRAUD and CORRUPTION?

For the purpose of this document, the following definitions apply:

**FRAUD** is a deception which is deliberate and intended to provide a direct or indirect personal gain. The term “fraud” can include criminal deception, forgery, blackmail, corruption, theft, conspiracy or the covering up of material facts and collusion. By using deception, a fraudster can obtain an advantage, avoid an obligation or cause loss to another party. The Fraud Act 2006 identifies three criminal offences:

- false representation
- failure to disclose information
- abuse of position.

**CORRUPTION** is the deliberate misuse of your position for direct or indirect personal gain. “Corruption” includes offering, giving, soliciting or acceptance of an inducement or a reward, which may influence the actions of any person.

### Responsibilities for implementation of this strategy

There is a duty to carry out investigations into suspected cases of fraud or corruption. It is the Headteacher’s responsibility to prevent and detect fraud. This is achieved by the establishment of sound systems of internal controls designed to reduce the risk posed by fraud within the school.

All Senior Leaders must share responsibility for prevention and detection of fraud; it is their responsibility, with the support of employees, to ensure that there are mechanisms in place within their area of control to:

- Assess the risk of fraud
- Promote employee awareness
- Educate employees about fraud prevention and detection.

The school requires all staff and Governors to act honestly and with integrity at all times and to guard the resources for which they are responsible.

Fraud and corruption can pose a significant threat to these resources and must therefore be a concern to all.

The table below sets out specific responsibilities with regard to prevention and detection of fraud:

<b>Governors</b>	To be accountable for the effectiveness of the school's arrangements for countering fraud and corruption. To support and promote the development of a strong counter fraud culture.
<b>Local Authority Head of Governance</b>	To provide advice on ethical issues, standards and powers to ensure that the school operates within the law and statutory Codes of Practice.
<b>External Audit</b>	Statutory duty to ensure that the school has in place adequate arrangements for the prevention and detection of fraud, corruption and theft.
<b>Local Authority Corporate Fraud and Investigations Team (based within Internal Audit)</b>	To develop and implement the Counter Fraud Policy. To offer a reactive investigation resource that will promptly investigate cases of suspected fraud reported under this policy. To make recommendations to improve controls and reduce the risk of fraud in the future. To receive and review notifications of all fraud, conducting and monitoring investigations and analysing fraud risk. To make appropriate arrangements to coordinate work on the National Fraud Initiative. To promote fraud awareness and training. To act as the school's consultant on issues of fraud and corruption.
<b>Headteachers</b>	To ensure staff receive fraud awareness and training. To ensure all suspected fraud is reported in a timely manner to the Local Authority Corporate Fraud Team. To ensure that they assess the risk of fraud, corruption and theft within school and reduce these risks by implementing robust internal controls.
<b>Staff</b>	To comply with the school's policies and procedures. To be aware of the possibility of fraud, corruption and theft, and to report any genuine concerns immediately. To act with honesty and propriety in the use of official resources and in the handling and use of public funds. To act in a responsible and accountable manner which maintains the integrity of the school as a public service. To safeguard corporate standards such as (but not limited to) Code of Conduct, Declarations of interest, Whistleblowing.
<b>Parents, Volunteers, Suppliers, Contractors and Consultants</b>	To be aware of the possibility of fraud and corruption against the school and report any genuine concerns / suspicions. To maintain adequate policies and procedures to mitigate the risk posed by fraud and maintain appropriate anti-fraud measures.

## Environment and Culture

The school is accountable and responsible for conducting its business in an open, honest, equal and fair manner. In doing so, it will take positive action against any identified fraudulent or corrupt activities.

The school will not tolerate abuse of its services or resources and expects high standards of propriety, integrity and accountability from all parties identified within this policy.

The school will ensure that any allegations received, including those made anonymously, will be taken seriously and investigated in an appropriate and timely manner. Investigation will be undertaken by the Local Authority's dedicated Corporate Fraud team who are trained to deliver a professional counter fraud service to the highest standards and will deal swiftly and firmly with those who defraud (or attempt to defraud) the school.

Fraud is a crime and will result in disciplinary, legal and/or criminal action against the individual(s) concerned.

The prevention and detection of fraud and corruption and protection of the public purse are everyone's responsibility. Concerns must be raised when there is a reasonable belief that one or more of the following has occurred, is in the process of occurring or is likely to occur:

- A criminal offence
- A failure to comply with a statutory or legal obligation
- Improper unauthorised use of public or other funds
- Improper unauthorised use of the school's assets and resources
- Falsifications of any document for monetary or pecuniary advantage
- A miscarriage of justice
- Maladministration, misconduct or malpractice
- A deliberate concealment of any of the above.

Any genuine suspicions of fraudulent activity must be reported immediately but the school will not tolerate malicious or vexatious allegations or those motivated by personal gain. If proven (or believed to be) malicious or vexatious then this may lead to disciplinary or legal action.

When fraud or corruption has occurred because of a breakdown in systems or procedures then the Headteacher will ensure that appropriate improvements in controls are implemented to prevent a reoccurrence.

## Approach

The school recognises that fraud and corruption are costly, both in terms of reputation risk and financial losses. A robust and effective approach to countering fraud is therefore vital and to reduce fraud and protect resources. The school will concentrate upon the key areas listed below:

<b>Deterrence</b>	<p>Have sound internal control systems, that still allow for innovation and efficiency, but at the same time minimising the opportunity for fraud and corruption.</p> <p>Encourage and develop a strong counter fraud culture, increasing resilience, raising awareness and acting as the single point of contact for fraud related matters.</p> <p>Provide information, advice and guidance on all aspects of counter fraud work.</p> <p>Publicise, when relevant and appropriate, results of all proactive work, fraud investigations, successful sanctions and any recovery of losses due to fraud.</p>
<b>Prevention</b>	<p>Working with all Governors and employees to ensure that there is a programme of appropriate and robust internal controls, including security measures to prevent fraud.</p> <p>Work with the Local Authority Audit Team to ensure new and existing systems and policy initiatives are adequately fraud proof.</p> <p>Utilise all avenues available to receive/issue fraud alerts and remind staff to remain vigilant to the risks posed by fraudsters</p> <p>Attend bespoke fraud awareness training where appropriate.</p>
<b>Detection</b>	<p>Continuously assess those areas most vulnerable to the risk of fraud. Carry out work in areas deemed as high risk to detect existing and new types of fraudulent activity.</p> <p>Implement effective whistleblowing arrangements.</p>
<b>Investigation</b>	<p>The Local Authority Corporate Fraud Team will be responsible for the investigation of allegations of fraud and corruption.</p> <p>Investigators will be appropriately trained.</p> <p>Investigations will be dealt with promptly and confidentially ensuring a consistent and fair approach and will be undertaken in line with existing legislation and Local Authority Policies.</p>
<b>Sanctions</b>	<p>Realistic and effective sanctions will be applied for individuals and/or organisations where an investigation reveals fraudulent activity. This may include legal, criminal, regulatory, and disciplinary action, where appropriate.</p>
<b>Redress</b>	<p>Consideration of the financial impact of fraud against the school means that any monies/assets lost through fraud will be rigorously pursued, where appropriate and through whatever means is considered appropriate.</p>

## Outcomes

The overriding aim of the team is to deliver a quality investigative service with the objective of preventing, detecting and deterring fraud throughout the School, thereby securing the public purse but investigation activity itself does not represent the outcomes of counter fraud work.

It is recognised that by preventing fraud, losses will be reduced and the delivery of a counter fraud work plan will improve overall outcomes and achieve the aims and objectives of this policy.

The measure of effectiveness of the school's counter fraud arrangements will focus on outcomes such as:

- Offering a 'reactive' response to fraud referrals to determine if fraud has occurred
- Producing an annual fraud risk register contributing to reducing the risk of fraud and thereby protecting the school's resources
- high levels of fraud awareness and training (attendance at training sessions)
- reduced losses through fraud-proofing policy and systems
- levels of financial penalties imposed and assisting in the recovery of those debts
- delivery of counter fraud work demonstrating best practice
- successful prosecutions and other sanctions.

## Further information

There are a range of interrelated policies and procedures that provide an effective deterrent to fraudulent activity and provide the means for reporting or detecting fraud or corruption. These have been formulated in line with appropriate legislative requirements, and include:

- The Local Authority's Constitution
- Finance and Contract Procedure Rules
- Codes of Conduct for members and officers
- Gifts and Hospitality
- Recruitment and selection procedures
- Disciplinary Procedure
- Whistleblowing Policy
- Anti-bribery policy
- Anti-money Laundering Policy

For any advice, assistance or to raise concerns in confidence please contact;

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### **The Whistleblowing hotline**

Tel; **01244 973223**

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