

Saint Robert Lawrence Catholic Academy Trust
Anti-Fraud, Theft and Corruption Policy

1 Introduction

1.1 The Academy Trust operates by Gospel values which include honest and careful stewardship of the resources entrusted to our use. Although instances of fraud and theft are rare and the Academy is not aware of any corruption, this Policy is seen as helpful confirmation of the Academy's stance on these matters.

1.2 The Academy Trust does not condone fraud, theft or corruption irrespective of whether it is attempted internally by employees or Academy directors or members or externally by members of the public. The Academy is committed to this Anti-fraud, Theft and Corruption Policy that is designed to:

- Encourage prevention;
- Promote detection;
- Ensure protection; and
- Identify a clear approach for investigation.

This policy is based on a series of measures designed to prevent attempted fraudulent or corrupt acts. The measures include:

- Establishing an anti-fraud culture;
- Prevention;
- Detection and investigation;
- Training; and
- Whistleblowing.

2 Fraud Strategy

2.1 All staff are required to report any suspected irregularities. Reporting is essential and:

- ensures the consistent treatment of information regarding fraud, theft and corruption;
- ensures compliance with legislation
- facilitates proper investigation

2.2 Depending upon the nature and anticipated extent of the allegations, the Academy will work with other agencies such as the police to ensure that all allegations and evidence is properly investigated and reported upon.

The Academy's Disciplinary Procedure will be used where the outcome of the Investigation indicates improper behaviour.

The Academy will normally wish the police to be contacted where financial impropriety or other criminal activity is discovered. Referral to the police ensures that offenders are dealt with in accordance with the law.

3 Definitions

3.1 Anti-Fraud is defined as the measures taken within the Academy to prevent, detect and investigate instances of fraud.

Saint Robert Lawrence Catholic Academy Trust
Anti-Fraud, Theft and Corruption Policy

3.2 Fraud itself may be regarded as any deliberate act taken by one or more individuals to deceive or mislead with the objective of misappropriating assets or business usually culminating in the distortion of the Academy's financial records or statements.

3.3 Theft is defined as being the dishonest appropriation of the Academy's property with intent to deprive the Academy of it permanently.

3.4 Corruption is defined as being the use of bribery, fraud or the irregular alteration and/or distortion of records to conceal and/or misappropriate assets of the Academy.

3.5 Whistleblowing means action by an employee to disclose malpractice in the form of irregularity, wrong-doing or serious failures of standards at work.

4 Culture

4.1 The Academy is committed to ensuring that its culture will continue to be one of honesty and opposition to fraud, theft and corruption. There is an expectation and requirement that all individuals and organisations associated in whatever way with the Academy will act with integrity and that Academy staff, directors and members, at all levels, will lead by example in these matters.

4.2 Academy staff are positively encouraged to raise any concerns about fraud, theft and corruption where they are associated with the Academy's activities.

They can do this in the knowledge that such concerns will be treated in confidence and properly investigated. Any instance must be reported to either:

- The Headteacher or
- A member of the Leadership and Management Team

4.3 The Leadership and Management Team is responsible for following up any allegation of fraud or corruption. The Headteacher will appoint an Investigating Officer.

The investigating officer will:

- deal promptly with the matter;
- record all evidence, ensure it is sound and adequately supported;
- ensure the security of all evidence;
- contact and liaise with other agencies, e.g. Police.

The Leadership and Management Team are expected to deal swiftly and firmly with those who defraud or steal from the Academy or who are corrupt. The Academy should be considered as robust in dealing with financial irregularity or malpractice.

4.4 There is, of course, a need to ensure that any investigation process is not misused, therefore, any incidence of raising unfounded malicious allegations may be dealt with as a

Saint Robert Lawrence Catholic Academy Trust
Anti-Fraud, Theft and Corruption Policy

disciplinary matter. Any wrong doing or malpractice outside the scope of this policy document should be reported to the Headteacher.

5 Prevention – Staff

5.1 The Academy recognises that a key preventative measure in the fight against fraud, theft and corruption is to take effective steps at the recruitment stage to establish, as far as possible, the previous record of potential staff. Temporary staff are subject to the same recruitment policies as permanent staff.

5.2 Staff recruitment must be in accordance with approved fair selection policies and, in particular, the Academy will obtain written references before employment offers are made.

5.3 Staff of the Academy are expected to adhere to established policies and to follow the Academy's guidelines and procedures together with, where applicable, their professional codes of conduct.

6 Systems

6.1 The Academy has Financial Regulations and Financial Operating Procedures in place that require staff, when dealing with the Academy's affairs, to act in accordance with best practice.

7 Detection and Investigation

7.1 Despite the best efforts of financial managers and auditors, many frauds and thefts are discovered by chance or from a 'tip off'. The Academy has arrangements in place through its Confidential Reporting Code to enable such information to be dealt with effectively.

8 Review

8.1 This policy will be reviewed by the Academy Trust every three years.

Approved by the Directors of the Academy Trust: 25th June 2012

Reviewed: 7th December 2015

Date for Next Review: December 2018