

MILTON PARK PRIMARY SCHOOL



ANTI-FRAUD, THEFT AND CORRUPTION POLICY

Date of Policy: March 2016

Adopted: 3.3.16 - Resources Committee

Review Date: March 2017

Rationale

Milton Park Primary School is committed to ensuring proper and honest use of its funds and assets. Governors and staff are encouraged to maintain vigilance and to comply with agreed policies and procedures to minimise the risk of fraud and other forms of malpractice. All members of the school community are encouraged to report any concerns or suspicions without fear of being penalised and in the knowledge that full support will be provided in respect of their confidentiality.

Acts of malpractice would include: inappropriate use of the school's delegated budget and/or unofficial funds; tampering with tender documents to advantage a particular party; manipulation of accounting records and finances; decision making for personal gain; inappropriate use of the school's assets; deceit; theft; abuse of position.

Governance

The Governing Body has a responsibility for ensuring that internal controls will ensure proper administration and safeguard the resources of the school.

In respect of fraud, it is therefore the responsibility of the Governing Body to ensure internal controls prevent and detect any frauds promptly. These include:

- proper procedures and financial systems,
- effective management and financial information,
- the application of the Code of Conduct for employees.

School Staff

The school has established a number of key measures to ensure the integrity of its staff including:

- a clear Recruitment Policy and procedures,
- a Code of Conduct for employees,
- a Staff Handbook,
- a policy on declaring pecuniary and/or business interests and not being involved in matters connected with such interests.

Internal Audit (North Somerset Council)

Internal Audit has a clear remit to undertake work to prevent and detect potentially fraudulent acts. This is in line with best practice. This work concentrates on areas of highest risk but also on areas which, although small, are subject to fraud.

Internal Audit also has a unique role in taking responsibility for:

- investigating fraud,
- establishing the extent of any fraud,
- correcting accounting records if necessary,
- recommending improvements in internal control,
- advising on action to take to resolve matters arising.

The Principle Anti-Fraud Measures

The school has a number of measures in place that should prevent or detect any attempted or actual fraud. No system of control can prevent all cases, and the school must minimise the risks to which it is exposed. At the highest level the school will:

- regularly review and improve key internal control systems,
- regularly review measures to minimise the risk of fraud,
- involve members in such reviews,
- adopt formal procedures to investigate fraud when it is suspected and, where detected, strengthen controls to prevent reoccurrence,
- provide mechanisms for employees to voice their genuine concerns,
- have no hesitation in referring cases of suspected irregularity to the attention of the Police and the external auditor,
- work closely with the Police and other appropriate agencies to combat fraud.

Key principle internal controls adopted by the school include:

- adequate separation of duties,
- proper authorisation procedures,
- proper audit trails,
- independent monitoring and checking,
- training of employees in their duties,
- appropriate supervision,
- effective management structures and organisation,
- physical controls over highly portable assets,
- effective IT and other security measures,
- a proper accounting and budgetary control system,
- effective Internal Audit review of systems.

Responsibility for effective implementation of these principles of internal control rests with the Governors and the Headteacher and involve every employee of the school.

Reporting Suspicions

General

Employees are vital to the successful implementation of measures against fraud. The school therefore considers that employees have a duty to report any legitimate concerns they may have and must do so as outlined above.

If it is subsequently established that an employee knowingly withheld information of a concern or allegation, it may be dealt with as a disciplinary matter in itself. Likewise, mischief making and raising unfounded malicious allegations will be treated equally severely.

The Public Interest Disclosure Act 1998 provides employees with statutory protection when disclosing such information.

Where possible, concerns are better raised in writing, setting out the background, giving names, dates and places and reasons for bringing the matter to the attention of the school. However, if an individual feels unable to put their concern in writing, an arrangement can be made to meet with an appropriate officer to discuss the concerns.

Confidentiality and Safeguards

The school recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the alleged malpractice. The school will not tolerate harassment or victimisation and will do what it lawfully can to protect an individual when a concern is raised in good faith.

This does not mean that if the person raising the concern is already the subject of a disciplinary, redundancy or other procedure that those procedures will be halted as a result of a concern being reported.

Confidentiality

All concerns will be treated in the strictest confidence and the school will do its best to protect the identity of individuals who raise concerns and do not want their name to be revealed. However, it must be appreciated that during an investigation a statement may be required as part of the evidence gathering process, especially if the Police or External Auditors become involved. In order to take effective action, the school will need proper evidence that may be required to stand up to examination in Courts or Tribunals.

This policy statement encourages individuals to put their name to allegations whenever possible, as concerns expressed anonymously are much less powerful, but will be considered at the discretion of the school in terms of:

- seriousness of the issues raised
- the credibility of the concern
- the likelihood of confirming the allegation from attributable sources.

Reporting Procedure for Staff

If you have reason to believe that an act of fraud, theft, corruption or dishonesty has taken place, you should convey your suspicions to someone with the appropriate authority and experience without delay. This would normally be your line manager, a member of the Senior Leadership Team or the Headteacher. If your suspicions involve one of these people, you should contact the Chair of Governors or Internal Audit at North Somerset Council.

Definitions:

Fraud

Fraud is a general term covering theft, deliberate misuse or misappropriation of assets or anything that leads to a financial advantage to the perpetrator or other upon whose behalf he or she acts, even if these 'others' are in ignorance of the fraud. Fraud is in fact intentional deceit, and for this reason it cannot include negligence.

Fraud incorporates: theft, larceny, embezzlement, fraudulent conversion, false pretences, forgery, corrupt practices and falsification of accounts.

Corruption

The term 'corrupt practices' is defined for the purposes of this code as the offering, giving, soliciting or acceptance of an inducement or reward which may influence the actions taken by the authority, its members or officers.

It is the duty of the Governing Body and Headteacher to take reasonable steps to limit the possibility of corrupt practices, and it is the responsibility of Internal Audit (North Somerset Council) to review the adequacy of the measures taken by the school to test compliance and to draw attention to any weaknesses or omissions.

Review

This policy will be subject to annual review to ensure that it remains current.

Other Applicable Policies

Finance Policy
Whistleblowing Policy
Staff Code of Conduct
Governors' Code of Conduct