



**GLEBE SCHOOL**  
**ANTI-FRAUD AND CORRUPTION POLICY**

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## Statement of intent

This policy details the school's position on the prevention of fraud, bribery and corruption, and the promotion of an anti-fraud culture.

Glebe School is committed to upholding the highest ethical standards and acting with integrity in all business activities.

As such, we are opposed to corruption and seek to eliminate fraud by the way we conduct school business, the culture instilled in staff and the recruitment of trustworthy individuals.

To minimise the risk and impact of fraud and corruption, we aim to create a culture which deters fraudulent and corruptive activity, encourages its prevention and promotes its detection and reporting.

The purpose of this policy is to:

- Establish the responsibilities of the Board of Trustees and staff members in observing and upholding our position on fraud and corruption.
- Provide information and guidance to school staff on how to recognise and deal with concerns over fraudulent activity.
- Promote the early detection of fraudulent and corruptive behaviour.

This policy covers all individuals working for the school at all levels (whether permanent, fixed-term or temporary), and includes members, trustees, volunteers, agents and any other persons associated with the school.

## 1. Legal framework

1.1. This policy has due regard to statutory legislation including, but not limited to, the following:

- ESFA Academies Financial Handbook 2020
- The Fraud Act 2006

1.2. This policy is implemented in accordance with the following school policies and procedures:

- Whistleblowing Policy
- Gifts, Hospitality and Anti-bribery Policy
- Conflicts of Interests Policy
- Disciplinary Policy and Procedure
- Staff Code of Conduct
- Trustees Code of Conduct

## 2. Definitions

2.1. **Fraud** is a criminal offence, which is defined by the Fraud Act 2006 as:

- Deceiving through false representation.

- Failing to disclose information where there is a legal duty to do so.
  - Abusing a position of trust.
- 2.2. **Corruption** is the offering, giving, soliciting or accepting of any inducement or reward which may influence the actions taken by the school, its members or officers.
- 2.3. Examples of what could constitute fraud and corruption include, but are not limited to, the following:
- Theft
  - Non-receipt of income
  - Substitution of personal cheques for cash
  - Travelling and subsistence claims for non-existent journeys or events, or inflating claims
  - Manipulating documentation to increase salaries
  - Payment of invoices for goods received by an individual rather than the school
  - Unauthorised borrowing of equipment
  - Failure to declare a conflict of interest
  - Concealing a generous gift or reward
  - Creation of false documentation
  - Sending invoices for goods and services that weren't ordered or received
  - Using the school's credit or debit card to make personal purchases
  - Intercepting a school cheque and amending the name of the payee and/or the amount
  - Submitting false claims for sickness, overtime/duties or expenses
  - Failing to fulfil contracted working hours
- 2.4. **Theft** is dishonestly appropriating property belonging to another with the intention of permanently depriving the other of it.

### 3. Roles and responsibilities

- 3.1. The Board of Trustees is responsible for:
- Ensuring that internal controls, procedures and policies are put in place that minimise the risk of fraud and corruption, including theft and bribery.
  - Monitoring school procedures in relation to fraud.
  - Approving this policy on a tri-annual basis, ensuring that it remains adequate and appropriate for the needs of the school.
  - Working with the headteacher to establish effective recruitment procedures, ensuring that all candidates are thoroughly vetted prior to commencing their employment.
  - Promoting an anti-fraud and corruption culture within the school.
  - Setting the standards for the school and giving their full support to all systems and controls in place to assure probity.

- Ensuring that any business and personal interests of all members of the Board of Trustees are declared.
- Taking appropriate action where fraud, theft or irregularity is suspected or identified.
- Reporting any instances of suspected fraud, theft and/or irregularity in excess of £5,000 individually, or £5,000 cumulatively in any financial year to the ESFA.
- Reporting any unusual or systematic fraud, regardless of value, to the ESFA.

3.2. Audit services are responsible for:

- Reporting concerns over inadequate fraud controls to the headteacher and Board of Trustees.
- Recommending necessary changes and improvements to address any inadequacies.

3.3. The headteacher/accounting officer is responsible for:

- Ensuring that all employees are aware of the school's policy on fraudulent and corruptive behaviour and understand the relevant school procedures.
- Setting high examples of conduct in their day-to-day work, which are beyond reproach.
- Publicising the school's commitment to fighting fraud and corruption.
- Working with the Board of Trustees to establish recruitment procedures, which ensure all candidates are thoroughly vetted prior to commencing their employment.
- Ensuring and monitoring the school's compliance with internal controls and agreed policies and procedures related to fraud and corruption.
- Commencing disciplinary action where appropriate.
- Informing the chair of the board of any indications of fraudulent activity and alleged financial irregularities.
- Reporting to the Board of Trustees on all aspects of fraud risk management.
- Declaring any business and personal interests, as well as any interests or offers of gifts or hospitality, which could be related to the performance of their professional duties.
- Reviewing this policy on a tri-annual basis, in liaison with the chief financial officer, ensuring that it remains adequate and appropriate for the needs of the school.

3.4. All members of staff are responsible for:

- Upholding the anti-fraud and corruption culture within the school.
- Adhering to the school's policies and procedures in relation to fraud and corruption.

- Ensuring they are familiar with the indicators of potential fraud, in addition to common types of fraud and irregularities that may occur within the school.
- Reporting any instances of suspected fraud or irregularity, no matter how trivial they may seem, to the headteacher or chair of the board, or by following the Whistleblowing Policy procedures.
- Declaring any business and personal interests held, as well as any offers of gifts or hospitality, which are in any way related to the performance of their duties in relation to the school.
- Ensuring that the school's reputation and assets are protected against fraud.

3.5. The chief financial officer (CFO) is responsible for:

- Developing, implementing and maintaining adequate systems of internal control to prevent and detect fraud.
- Ensuring that all relevant staff are adequately trained on internal controls and procedures that need to be complied with.
- Implementing any changes to the internal controls and procedures that may have been identified as a result of a fraud or irregularity investigation, to prevent further instances of fraud or corruption.
- Informing the headteacher or the chair of the board, as appropriate, of any indications of fraudulent activity and alleged financial irregularities.
- Declaring to the headteacher any business and personal interests, as well as any interests or offers of gifts or hospitality, which are in any way related to the performance of their duties in relation to the school.
- Reviewing this policy on a tri-annual basis, in liaison with the headteacher, ensuring that it remains adequate and appropriate for the needs of the school.

3.6. All trustees and staff, including volunteers, temporary staff and third parties, are responsible for:

- Demonstrating the highest standards of honesty, probity, openness and integrity in the discharge of their duties. This includes:
  - Compliance with the provisions outlined in this policy.
  - Contributing to a framework within which counter-fraud arrangements will flourish.
  - Promoting an anti-fraud and corruption culture.
  - Reporting their concerns in relation to fraud.
  - Reporting any breach of this policy to the headteacher or chair of the board.
  - Providing information about any conflicts of interest and direct or indirect pecuniary interests to the headteacher.

## **4. Creating an ethical culture**

- 4.1. The creation of an ethical, anti-fraud culture underpins all the work done by the school to counter fraud and other irregularities.
- 4.2. All employees are expected to act with high levels of integrity and to adhere to the rules outlined in this policy.
- 4.3. All individuals and organisations that work with the school must act with integrity.
- 4.4. Anti-fraud awareness training is held for all employees on an annual basis, to ensure employees understand the risk of fraud faced by the school.
- 4.5. Specific training is also provided to employees with responsibility for the school's internal controls.
- 4.6. There are clear reporting mechanisms in place (as outlined in section 7) and all employees are aware of, and follow, these procedures.

## **5. Preventing fraud and corruption**

- 5.1. Fraud and corruption are minimised through effectively designed and consistently implemented management procedures which deny opportunities for fraud and corruption.
- 5.2. The headteacher and CFO assess the areas of the school that are most vulnerable to fraud on a termly basis following receipt of the termly internal audit scrutiny visit.
- 5.3. Robust internal controls are in place to manage the risk of fraud, these cover the following areas:
  - Approval and authorisation process of transactions
  - Access restrictions and transaction controls
  - Account reconciliations
  - Physical security of assets
  - Segregation of responsibilities
  - Pre-employment checks
- 5.4. Internal controls are reviewed on an annual basis by the headteacher/accounting officer and CFO as part of the year-end financial processes to ensure they remain effective and are being consistently applied.
- 5.5. Financial procedures and systems reflect the need for internal checks and internal controls. All employees that are involved in the implementation of these controls are provided with training.

- 5.6. Robust IT procedures are put in place, including restricting access to certain systems. Other steps taken towards ensuring IT security are outlined in [section 13](#) of this policy.
- 5.7. All employees will follow the Staff Code of Conduct.
- 5.8. Following a case of fraud or irregularity, the risk management strategy is reviewed to ensure it considers all relevant risks and is effective.

## **6. Indicators of fraudulent activity**

- 6.1. Some actions and behaviours may give cause for concern, arouse suspicion and possibly indicate fraudulent activity. A list of actions and behaviours that may give cause for concern, arouse suspicion and indicate possible fraud can be found in [Annex A](#) – any actions or behaviours in this list will be brought to the attention of the CFO and the individual in question will be closely monitored.
- 6.2. All staff are vigilant to the risks of fraud.
- 6.3. The school recognises that the presence of any of these indicators may not be a cause for concern; however, they will always be investigated appropriately.
- 6.4. It is important to note that any one of these on its own may be perfectly innocent and a function of carrying out normal duties; however, a combination of the factors may give cause for concern.

## **7. Reporting suspected fraud**

- 7.1. Concerns regarding fraudulent activity are reported to the headteacher or, where there are concerns over the headteacher, the chair of the board.
- 7.2. Concerns can be raised in person, via email or telephone.
- 7.3. Under no circumstances will staff investigate the matter themselves.
- 7.4. Any concerns are reported immediately in the knowledge that such concerns are treated in confidence and properly investigated.
- 7.5. Procedures outlined in the Whistleblowing Policy are followed to report concerns where the normal reporting procedure is not appropriate. The Whistleblowing Policy can be found on the school's website or obtained from the finance office. Employees who raise concerns in good faith are supported by the school and the school ensures that they are not subjected to any detrimental treatment as a consequence of their report. Any instances of detrimental treatment against an employee for reporting a suspicion are treated as disciplinary offences.



- 7.6. Claims are, in the first instance, investigated by the headteacher to ascertain the basic facts. If the claim concerns the headteacher, the chair of the board ascertains the basic facts.
- 7.7. Subject to the findings, the matter may:
- be reported to the ESFA in accordance with the Academies Financial Handbook; and/or
  - result in a full internal investigation under the school's disciplinary procedures.
- 7.8. Suspects are not made aware that they are under investigation until agreed by the headteacher and/or chair of the board.
- 7.9. No information concerning suspicions of fraud or corruption are reported to the press, media or any other third party. Such disclosures may damage the investigation and any subsequent actions to be taken.
- 7.10. If necessary, the school's internal audit service has full right of access to examine any necessary documents and the contents of school property, including the examination of computers and related equipment, as well as to undertake interviews with staff members.
- 7.11. The investigation process includes:
- Gauging the credibility of the allegation.
  - Securing evidence and ensuring it is retained in the original format.
  - Interviewing witnesses.
  - Taking statements.
  - Interviewing potential suspects.
  - Liaising with the headteacher and Board of Trustees, as well as external agencies where necessary.
- 7.12. Where fraud is proven, this constitutes gross misconduct and cases are dealt with in accordance with the school's disciplinary procedures.
- 7.13. Where appropriate, the school refers cases to the police for them to consider taking criminal action.
- 7.14. The school will seek to apply appropriate criminal, civil and disciplinary sanctions to all cases of proven fraud and corruption.

## **8. Recovery of losses**

- 8.1. Where practicable, the school seeks to recover any losses incurred as a result of fraud or corruption.

- 8.2. The Board of Trustees is immediately informed of any potential loss and provided with details of the case and any recovery action being undertaken.
- 8.3. If an individual under investigation offers money in settlement of losses to the school, the monies are accepted without prejudice to any other action the school may wish to take.
- 8.4. Money will only be accepted in respect of losses to date and the school will reserve the right to seek the recovery of further losses that may come to light in the future.
- 8.5. The school will only claim under insurance arrangements once all other avenues of recovery have been exhausted.

## **9. Confidentiality**

- 9.1. The school understands that the decision to report a concern can be a difficult one to make.
- 9.2. Victimisation or harassment of anyone who has made a report is never tolerated.
- 9.3. Where possible, the identity of the person who made the report is kept confidential – their identity is only shared on a need-to-know basis.

## **10. Cybercrime and cybersecurity**

- 10.1. The school is vigilant of cybercrime and clear cybersecurity measures are in place.
- 10.2. The following measures are in place specifically relating to addressing the risk of fraud, theft and/or irregularity:
  - Firewalls, anti-virus software and strong passwords are used
  - Data is routinely backed up
  - A restricted number of password protected devices are used to access data
  - Staff receive training to ensure they:
    - Check the sender of an email is genuine before, for example, sending payment, data or passwords.
    - Make direct contact with the sender where an email requests a payment – this is done in person where possible, but at a minimum, staff must use another method other than the direct reply function.
    - Understand the risks of using public Wi-Fi.
    - Understand the risks of not following payment checks and measures.

- 10.3. Any suspected incidents of fraud, theft and/or irregularity relating to cybersecurity are reported and managed as outlined in [section 7](#).

## **11. Record keeping**

- 11.1. The school keeps financial records and has appropriate internal controls to provide evidence for business reasons and for making payments to third parties. Employees must make the CFO aware of all hospitality or gifts received or offered over the value of £25 – these are subject to managerial review.
- 11.2. Employees' expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the school's financial procedures.
- 11.3. All invoices, accounts and related documents are prepared and maintained with the highest accuracy and completeness.
- 11.4. No accounts are kept "off-book".

## **12. Monitoring and review**

- 12.1. This policy is reviewed every three years, or as required by changes to legislation, by the finance & audit committee, CFO and the headteacher.
- 12.2. The scheduled review date for this policy is spring 2024.

## **Annex A: Indicators of potential fraud**

*This list is not exhaustive and is a guide only. Due to the nature of fraud, indicators may not be exclusive to just one area.*

### **Personal motives for fraud**

- Personnel believe they receive inadequate compensation and/or rewards, e.g. remuneration, recognition, job security, holidays or promotions
- Expensive lifestyle, e.g. luxury cars and holidays
- Personal problems, e.g. gambling, alcohol, drugs or debt
- Unusually high degree of competition or peer pressure
- Related party transactions
- Conflicts of interest
- Disgruntled employees, e.g. being recently demoted or reprimanded
- Recent failure associated with specific individual
- Personal animosity or professional jealousy

### **Organisational motives for fraud**

- Organisation experiencing financial difficulty
- Commercial arm experiencing financial difficulty
- Tight or unusually tight time deadlines to achieve level of outputs
- Organisational governance lacks clarity, direction or substance
- Organisation closely identified with, or dominated by, one individual
- Organisation under pressure to show results, e.g. budgetary matters or exam results
- Organisation recently suffered disappointment or the consequences of bad decisions
- Organisation wants to expand its scope or obtain additional funding
- Funding award or contract for services is up for renewal or continuation
- Organisation due for a site visit by auditors, Ofsted or others
- Organisation has a for-profit component
- Organisation recently affected by new and/or changing conditions, e.g. regulatory, economic or environmental
- Organisation faces pressure to use or lose funds to sustain future funding levels
- Record of previous failure(s) by one or more organisational areas, associated business or key personnel
- Sudden change in organisation practice or pattern of behaviour

### **Weakness in internal controls**

- There is a general lack of transparency about how the organisation works, and its procedures and controls
- Management demonstrates a lack of attention to ethical values – including a lack of communication regarding the importance of integrity and ethics, a lack of concern about the presence of temptations and inducements to commit fraud, a lack of concern regarding instances of fraud, and no clear fraud response plan or investigation policy
- Management fails to specify and/or require appropriate levels of qualifications, experience or competence for employees

- Management displays a penchant for taking risks
- Lack of an appropriate organisational and governance structures with defined lines of authority and reporting responsibilities
- Organisation lacks policies and communication relating to individual accountability and best practice, e.g. relating to procurement, expenses, use of alcohol and declarations of interest
- Lack of personnel policies and recruitment practices
- Organisation lacks personnel performance appraisal measures or practices
- Management displays a lack of commitment towards the identification and management of risks relevant to the preparation of financial statements
- There is inadequate comparison of budgets with actual performance and costs, forecasts and prior performance – there is also no regular reconciliation of control records and a lack of proper reporting to the Board of Trustees
- Management of information systems is inadequate, e.g. no policy on ICT security, computer use, verification of data accuracy, or completeness or authorisation of transactions
- There is insufficient physical security over facilities, assets, records, computers, data files and cash
- Failure to compare existing assets with related records at reasonable intervals
- There is inadequate or inappropriate segregation of duties regarding initiation, authorisation, recording transactions, maintaining custody of assets and alike
- Accounting systems are inadequate, i.e. they have an ineffective method for identifying and recording transactions, no tracking of time periods during which transactions occur, insufficient description of transactions and to which account they should be allocated to, no easy way to know the status of funds on a timely basis, and no adequate procedure to prevent duplicate payments or missing payment dates
- Purchasing systems and/or procedures are inadequate, e.g. poor or incomplete documentation to support procedure, purchase, payment or receipt of goods or services
- Subcontractor records and/or systems reflect inadequate internal controls
- There is a lack of internal, ongoing monitoring of controls which are in place and/or failure to take any necessary corrective actions
- Management is unaware of or displays a lack of concern regarding applicable laws, e.g. Companies Act 2006, Charities Act 2011
- Specific problems and/or reportable conditions identified by prior audits or other means of oversight have not been corrected
- No mechanism exists to inform management, directors, trustees or governors of possible fraud
- General lack of management oversight

### **Transactional indicators**

- Related party transactions with inadequate, inaccurate or incomplete documentation or internal controls, e.g. business activities with friends
- Not-for-profit entity has for-profit counterpart with linked infrastructure, e.g. shared board of trustees, governors or other shared functions and personnel
- Specific transactions that typically receive minimal oversight

- Previous audits with findings of questioned costs, evidence of non-compliance with applicable laws or regulations, weak internal controls or an inadequate management response to any of these issues
- Transactions and/or accounts which are difficult to audit and/or subject to management judgement and estimates
- Multiple sources of funding with inadequate, incomplete or poor tracking, failure to segregate funds, or existence of pooled funds
- Unusual, complex or new transactions, particularly if they occur at year end or the end of the reporting period
- Transactions and accounts operating under time constraints
- Cost sharing, matching or leveraging arrangements where industry money or another donation has been put into a foundation without adequate controls to determine if money or equipment has been spent/used and whether it has gone to allowable costs and at appropriate and accurate valuations
- Outside entity provided limited access to documentation
- Travel accounts with inadequate, inaccurate or incomplete documentation or poor internal controls, variances between budgeted amounts and actual costs, claims in excess of actual expenses, reimbursement for personal expenses, claims for non-existent travel, or collecting duplicate payments
- Credit card accounts with inadequate, inaccurate or incomplete documentation or internal controls such as appropriate authorisation and review
- Accounts in which activities, transactions or events involve handling of cash or wire transfers
- Presence of high cash deposits maintained with banks
- Assets which are of a nature easily converted to cash (e.g. small size, high value, high marketability or lack of ownership identification) or easily diverted to personal use (e.g. cars or houses)
- Accounts with large or frequent shifting of budgeted costs from one cost centre to another without adequate justification
- Payroll (including fringe benefits) system has inadequate controls to prevent an individual being paid twice or paid for non-delivery or non-existence
- Payroll (including fringe benefits) system is outsourced but there is poor oversight of starters, leavers and payments
- Consultant and subcontract agreements which are vague regarding the work, time period covered, rate of pay or product expected
- There is a lack of proof that a product or service was delivered by a consultant or subcontractor
- Sudden and/or rapid growth of newly contracted or existing education providers, e.g. significant increase in pupil numbers for newly contracted providers

### **Methods used to commit and/or conceal fraud**

Employee indicators such as:

- Eagerness to work unusual hours
- Access to or use of computers at unusual hours
- Reluctance to take leave or seek support

- Insistence on doing their job alone
- Refusal of promotion or reluctance to change their job

Auditor/employee issues such as:

- Refusal or reluctance to provide information or hand over documents
- Unreasonable explanations
- Annoyance or aggressive responses to questions or requests to deter auditors
- Trying to control the audit process
- Auditee/employee blames a mistake on a lack of experience with financial requirements or regulations governing funding
- Promises of cooperation followed by subsequent excuses to limit or truncate cooperation
- Subtle resistance
- Answering a question that was not asked
- Offering more information than asked
- Providing a lot of information in some areas and little to none in others
- Explaining a problem by saying “we’ve always done it that way” or “someone from the government told us to do it that way”
- A tendency to avoid personal responsibility, e.g. overuse of “we” and “our” rather than “I”
- Blaming someone else
- Unreasonable levels of forgetfulness
- Trying to rush the audit process
- Uncharacteristic willingness to settle questioned costs in an attempt to deter further investigation or analysis

General indicators such as:

- A general lack of transparency about how the organisation works and its procedures and controls
- Fabricated explanations to support inability or unwillingness to evidence transactions or assets, such as stated loss of electronic data or theft of business records

### **Record keeping, banking and other**

- Documents that are missing, copied, written in pencil, altered, or that contain false signatures, the incorrect signature or no authorisation where it would be expected
- Deviation from standard procedures, e.g. all files but one handled in a particular way
- Excessive and/or poorly evidenced journal entries and unable to provide an explanation for journal entries
- Transfer to or via any type of holding or suspension account
- Inter-fund company loads to other linked organisations
- Records maintained are inadequate, not updated or not reconciled
- Use of several different banks or frequent bank changes
- Use of several different bank accounts
- Failure to disclose unusual accounting practices or transactions
- Unusual accounting practices or transactions, including:

- Uncharacteristic willingness to settle questioned costs
- Non-serial-numbered transactions or out-of-sequence invoices or other documents
- Creation of fictitious accounts, transactions, employees or charges
- Writing large cheques to cash or repeatedly to an individual
- Excessive or large cash transactions
- Payroll cheques with unusual or questionable endorsements
- Payees with similar names or addresses
- Non-payroll cheques written to an employee
- Defining delivery needs in ways that can only be met by one source or individual
- Continued reliance on person or entity despite poor performance
- Treating non-business and/or personal goods or services as business transactions in financial records
- Misuse of a director's loan account facility, e.g. deliberate miscoding of transactions in a director's loan account to gain personal advantage
- Materials goods and/or services fictitiously and erroneously reported as purchased, and evidence has been fabricated to support the claim. This could potentially be evidenced by:
  - Repeated purchases of the same items
  - Identical items purchased in different quantities within a short time period
  - Invoices and statements used to evidence purchase facilitating duplicate transactions or payments
  - Anomalies in the format of purchase invoices
  - Goods or equipment are not used as promised, or they do not work or exist
- Legitimate business assets put to non-business or private use