

POLICY DOCUMENT



Anti-Fraud Policy

LAST UPDATED	(by) R Good	May 2022
LAST REVIEWED	(by) Resources Committee	

POLICY TYPE	Non-Statutory
REVIEW DATE	Every 2 Years – May 2024

RESPONSIBLE		
Leadership Team	R Good	
Governing Committee	Resources Committee	
APPROVED	Approved by Governors	
	Meeting Date	9 th May 2022
UPDATE: Shared Drive Website (if applicable)	27 th May 2022 27 th May 2022	

At Newlands we create confident and responsible young women equipped with the skills they need for the twenty first century. We empower all students to realise their potential as part of a sustainable community committed to lifelong learning.

1. Introduction

1.1 Newlands Girls' School is committed to discharging its responsibility to safeguard public funds and the highest standards of integrity. It is committed to fighting fraud and corruption whether attempted from inside or outside. Newlands Girls' School is committed to having effective measures to prevent and detect fraud and corruption.

1.2 Newlands Girls' School expects all members and employees to carry out their duties in accordance with appropriate legal requirements, internal codes of practise, rules and regulations and to act at all times with honesty and probity in the discharge of their functions.

1.3 In carrying out its duties and responsibilities, Newlands Girls' School is determined to do everything it reasonably can to protect itself and the public from fraud and corruption and is committed to the rigorous maintenance of this Anti-Fraud & Corruption Strategy which will provide a framework for:

- encouraging fraud deterrence and prevention;
- raising awareness of fraud and corruption and promoting their detection;
- performing investigations and facilitating recovery of losses;
- invoking disciplinary proceeding and referrals to the Police; and
- monitoring, publishing and updating the Strategy and its related procedures and performance.

1.4 Newlands Girls' School also expects that all outside individuals and organisations, including suppliers, contracting partners and claimants will act toward it with honesty and integrity without thought or actions involving fraud and corruption.

1.5 This Strategy is part of Newlands Girls' School's Anti-Fraud and Corruption Framework and sits alongside other policies and guidance including the Whistleblowing Policy (Raising Concerns at Work).

2. Definitions

These definitions are provided for guidance and are not intended to be exhaustive.

Newlands Girls' School defines the following:-

Theft is 'the dishonest taking of property belonging to another person with the intention of permanently depriving the owner of its possession'.

Fraud is 'the intentional distortion of the financial statements or other records by persons internal or external to the organisation which is carried out to conceal the misappropriation of assets or otherwise for gain.' This differs from "theft" where no attempt at concealment is made. It is also important to distinguish this from negligence and accidental error where no intent exists. This may involve:

- falsification or alteration of accounting records or other documents;

- suppression or omission of the effects of transactions from records or documents;
- recording transactions which have no substance;
- wilful misrepresentation of transactions or of Newlands Girls' School's state of affairs.

Corruption is 'the offering, giving, soliciting or acceptance of an inducement or reward which may influence actions taken by the body, its members or offices.' Main areas of activity which are susceptible to corruption may include:

- contracts;
- asset disposal;
- licenses.

3. Operating Culture

3.1 Newlands Girls' School is determined that the culture and tone of the origination meets the expectations of the Committee on Standards of Public Life and the Standards Board for England. It is committed to the ten principles of public life: objectivity, openness, stewardship, leadership, accountability, honesty & integrity, selflessness, personal judgement, duty to uphold the law and respect for others.

3.2 Employees are expected, and are positively encouraged to raise any concerns relating to fraud and corruption, which they become aware of. These can be raised in a number of ways including with the employees' line manager, the Acting Co-Headteachers/ Headteacher or the Chair of Governors. Full information about concerns is set out in the Whistleblowing Policy (Raising Concerns at Work).

3.3 Newlands Girls' School expects members and employees to lead by example in ensuring opposition to fraud and corruption, and in ensuring adherence to rules and regulations, and to relevant Codes of Conduct, and that all procedures and practices are beyond reproach. The responsibility of senior managers is to ensure that all employees are aware of what is expected of them.

3.4 Newlands Girls' School requires all individuals and organisations with whom it deals in any capacity to behave towards it with integrity and without intent or actions involving fraud and corruption.

3.5 Newlands Girls' School employees and other stakeholders are important elements in the stance against fraud and corruption and are positively encouraged to raise any concerns they may have on these issues which may impact on Newlands Girls' School activities using the Whistleblowing Policy (Raising Concerns at Work) and Newlands Girls' School's Complaints Procedures.

3.6 As part of his/her responsibilities, the Responsible Officer is required to investigate activities suspected of involving fraud and corruption, and to review processes and procedures designed to prevent such activities.

3.7 Where appropriate, Newlands Girls' School operates with local authorities and public sector bodies in the prevention, detection and investigation of fraud and corruption.

3.8 Although Newlands Girls' School encourages its employees to report concerns acting in good faith, any maliciously motivated and unfounded allegations may be dealt with through its disciplinary procedures.

4. Prevention

4.1 It is the corporate responsibility of Newlands Girls' School to put in place preventative measures to fight fraud and corruption to minimise risk.

4.2 Newlands Girls' School's Scheme of Delegation and Financial Procedures set out a framework for dealing with the affairs of Newlands Girls' School and all members and employees have a duty to comply with their provisions. This includes the duty of employees to act without statutory regulations.

4.3 Newlands Girls' School has put in place systems and procedures to manage and discharge its functions in an efficient and effective way. These systems incorporate internal controls to prevent and deter fraud and corruption. Employees must ensure that working practices comply with the systems and the Responsible Officer will regularly evaluate the appropriateness and effectiveness.

4.4 Thorough documentation, including manuals and operating procedures, effective control is expected of all financial and operational systems and they must be issued to relevant staff. These must be regularly reviewed to ensure in line with best practice and effective internal controls.

4.5 Employee recruitment is required to be in accordance with equality, equal opportunity and employment law and in particular adequate checks must be made appropriate to the posts and before any appointment is made.

4.6 Employees are required to disclose any offers of gifts, hospitality or interests that could conflict with the interests of Newlands Girls' School or might affect their judgement.

5. Detection and Investigation

5.1 All line managers are responsible for the prevention and detection of fraud, corruption and other irregularities. Line managers should pay special attention to particular circumstances, which may indicate an irregularity.

5.2 It is the responsibility of all employees, in particular line managers to immediately inform the appropriate authorities if a fraud or other irregularity is suspected. They should also ensure that:

- any supporting documentation or other evidence is secured; and
- confidentiality is maintained so as to not prejudice any subsequent investigation.

5.3 Reporting of suspected irregularities to the Acting Co-Headteachers/ Headteacher/Chair of Governors is essential because it:

- ensures the consistent treatment of information;
- facilitates proper investigation, including compliance with statutory requirements and appropriate liaison at correct stages with the Police, and
- ensures the proper implementation of relevant system improvements.

5.4 Newlands Girls' School will take appropriate action following an investigation including disciplinary action, civil recovery and referral to the Police.

5.5 Newlands Girls' School will work in partnership with other organisations for the detection and investigation of fraud and corruption. These organisations include the Police/Action Fraud, the Public Sector Audit Appointments Ltd and the National Audit Office.

6. Training

6.1 Newlands Girls' School supports induction and work related training, particularly for employees involved in financial control to ensure that their responsibilities and duties are regularly highlighted and reinforced and best practice is followed.