

TITLE: ANTI FRAUD POLICY

MODEL POLICY STATEMENT

This is a Local Authority model policy

Local changes **have not** been made to the model policy by the College

The model policy used is DCC Policy for Local Authority Maintained schools 2012

Policy Owner:	Strategic Business Leader	Review period:	Annual
Last Review:	June 2107	Approving Committee:	Resources 22.06.2017
Next Review:	Summer term 2018	Latest FGB adoption:	12.07.2017

IMPACT OF THIS POLICY

This policy is a policy to cover the procedure for reporting irregularities which could be theft, deception, fraud, corruption or impropriety.

Anti-fraud Policy to be read in conjunction with the School's Whistleblowing Policy

May 2012

1. For the purpose of this policy statement fraud includes all irregularities which could normally be described as theft, deception, fraud, corruption, or impropriety. Fraud is always wrong. In any organization, it countermands the management at every level and positive action is needed to prevent and discourage it. The prevention of fraud and the protection of each of the schools is the responsibility of every member of staff.
2. Each discovered loss of an amount exceeding £100 arising from suspected theft or fraud shall be reported to the Resources Governors at the earliest opportunity.
3. In every case, reported suspicions will be passed to the Chair of the Resources Committee who will inform the Headteacher (unless the fraud involves the Senior Leadership Team); the Responsible Officer and the Chair of Governors. . The Chair of the Resources Committee will decide on the subsequent course of action after consulting those that are informed.

When fraud is identified, action will be taken to:

- Clarify the situation
- Limit the damage
- Inform the police, if a criminal offence has been committed
- Seek reparation for losses incurred (Ex Gratia payment)
- Revise procedures to prevent any recurrence

4. Reporting of suspected fraud

Any suspicion of fraud should be reported to a member of the Senior Leadership Team. If it is considered more appropriate (for example, if a member of the Senior Leadership Team is involved) the suspicions may be reported directly to the Chair of Governors.

5. After a suspicion is reported

The Senior Leadership Team member or Chair of Governors will make any initial enquiries considered necessary to clarify the situation. In every case and as soon as possible after these initial investigations, he or she will pass the matter to the Principal (unless the Principal is suspected, in which case it will be reported directly to the Chair of Governors).

Even if there is no evidence to support the allegation, the Principal must report the matter to the Chair of Governors.

6. The Audit sub-committee

The management of any investigation will be undertaken by an Audit sub-committee set up and controlled by the Resource Committee who will seek advice from the Responsible Officer.

They will:

- 6.1 clarify the situation
- 6.2 determine whether the matter should be reported to the Chair of Governors.
- 6.3 determine who should carry out the investigation
- 6.4 determine which outside agencies (police, auditors) should be involved
- 6.5 assess the risk to the school
- 6.6 determine to whom day to day management of the response should be given
- 6.7 allocate responsibility for damage limitation action
- 6.8 determine the course of action to recover losses
- 6.9 determine the course of action to be taken against wrongdoers
- 6.10 evaluate the events which enabled the fraud to occur
- 6.11 ensure preventative action is taken