



ANTI-FRAUD POLICY

Reviewed by:	Finance & Resources Committee
Date of Issue:	February 2024
Date of next Review:	February 2025
Responsible member of SLT:	Karen Ashley

This policy is set within the school's four principles of:

High Expectations Quality Learning Mutual Respect Success for All

This policy accords with national legislation.

Key Principles

Stanborough School will:

- Introduce appropriate measures to minimise the risk of fraud
- Adopt formal procedures to investigate fraud when it is suspected
- Provide appropriate mechanisms for employees to voice their genuine concerns and protect those who do so
- Deter employees from making malicious or unfounded accusations
- Have no hesitation referring cases of suspected financial irregularity to the attention of the police
- Work closely with the police and other appropriate external agencies to combat fraud
- Support national and local initiatives against fraud

Measures to Minimise the Risk of Fraud

In order to maintain Stanborough School's high standards, procedures and controls have been established to provide an environment which will minimise the opportunity for fraud. These procedures and controls help conduct our business in a manner beyond reproach. They establish the rules to which Governors and employees must adhere and are supported, as necessary, by detailed procedure manuals which have been prepared for the key functions of Stanborough School.

It is the responsibility of the Governors and Headteacher to operate internal systems to ensure that high standards are applied and brought to the attention of their employees. Procedures are operated throughout to ensure:

- An adequate separation of duties
- Proper authorisation procedures
- Independent monitoring and checking of data and documentation

Stanborough School has a rigorous audit process which monitors compliance with regulations and undertakes checks to detect, deter and prevent fraud and corruption whilst monitoring systems and procedures to ensure they are fully operated and remain appropriate.

Procedures when a Fraud is Suspected

Stanborough School requires suspected irregularities to be referred to the Headteacher. All reported irregularities will be thoroughly investigated. The normal sequence of events, should an irregularity be suspected, will be as follows:

- If employees suspect an irregularity has occurred, or is likely to occur, they should normally report this to their line manager who will in turn inform the Headteacher. If this relates to their line manager, they should report directly to the Headteacher. If the concern is regarding the Headteacher, it should be reported to the Chair of Governors
- Should preliminary investigations suggest the suspicion is reasonable, the Chair of Governors should be informed, without delay
- If the suspicions stem from an audit, the Headteacher will inform the Chair of Governors
- Members of the public are encouraged to report any concerns to the Headteacher

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- Where further investigations indicate an offence may have occurred, the Headteacher will consult with the Governors. This will normally result in a decision to handle the matter according to the school's disciplinary procedures and to involve the police
- Where financial impropriety is suspected, the police will normally be informed

Mechanisms for Employees to Voice Concerns

Employees are vital to the successful implementation of measures against fraud, therefore we encourage employees to report any concerns they have, without fear of being penalised. Normally, employees should raise such concerns with their line managers, who have a responsibility to investigate and keep the Headteacher fully informed. However, other routes are available and employees are free to discuss the matter with any of the following:

- The Headteacher
- The Chair of Governors

All concerns reported will be treated in confidence and fully investigated. If anonymity is requested, every effort will be made to ensure such confidentiality.

The manager or Headteacher to whom the concerns are expressed will take prompt action and the employee will be notified quickly of any action taken. Where action is not considered appropriate, the employee will also be given a prompt and thorough explanation of the reasons for this. In the event of a disagreement, the employee will be advised how to pursue the matter formally.

Employees should be aware that, if a suspicion is reported and results in a prosecution or disciplinary hearing, their involvement as a witness in those processes may be necessary, unless other substantial reliable evidence is available.

There is also a need to ensure that the investigative process is not misused. Therefore, any abuse, such as raising unfounded or malicious allegations, may be dealt with as a disciplinary matter in itself. This should not deter employees from raising genuine concerns (even if subsequently unfounded but made with good intent), as in so doing, they will be supported in every possible way.

Reporting to ESFA

- Any instances of fraud, theft and/or irregularity exceeding £5,000 individually or £5000 cumulatively in any financial year must be notified to the ESFA
- Any unusual or systematic fraud, regardless of value, must also be reported to the ESFA

REFERENCED POLICIES

Disciplinary Policy

DOCUMENT CONTROL

Document Control		
Edition	Issued	Changes from previous
1	March 20	New policy
2	February 21	No changes
3	February 22	No changes
4	February 23	No changes
5	February 24	No changes

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