Church Hill C of E Junior School

'Let Your Light Shine' (Matthew 5:16)

Together Everyone Achieves More

Anti-Fraud and Corruption Policy

Signed by: .....

Date: 30/6/26

Approved by Governor

Date: 30/06/26

Signed on behalf of the Governing body: .....
(Chair of Governors)

Next Review Date: July 2027

1. BACKGROUND

1.1 Church Hill C of E Junior School is committed to protecting the public funds entrusted to it so that the maximum amount of resources can be used for their intended purposes. In doing so it seeks to maintain the highest standards of probity.

1.2 As a part of its commitment to protecting public funds, and to make the most efficient and effective use of the resources it is responsible for, it is essential the risk to the school of financial losses due to fraud, corruption and impropriety is minimised.

2. COMMITMENT

2.1 The Governing Body is committed to ensuring that all stakeholders of the school and the public in general have complete confidence that its affairs are conducted in accordance with the highest standards of probity and accountability. As part of this commitment the Governing Body is committed to combating fraud, corruption and other financial impropriety (e.g. theft) wherever it may arise in relation to the school's activities or services and, in achieving this aim, realises this involves any Governor, member of staff or member of the public or any other third party associated with its activities.

3. DEFINITIONS

3.1 For clarity and transparency the school adopts the following definitions:

Fraud *is the intentional distortion of 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.*

Examples of fraud in the context of a school environment could be:

- Falsifying or altering accounting records or other documents
- Suppressing or omitting the effects of transactions from records or documents
- Adding records of transactions which have no substance
- Wilful misrepresentation of transactions or other school affairs

Corruption *is the offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person.*

Examples of corruption in the context of a school environment could be in dealing with:

- Tenders

- Contracts
- Disposal of Assets

The above represent examples only and do not represent a definitive and exhaustive list.

4. STANDARDS

4.1 The Governing Body expects Governors and its school appointed staff and contractors to demonstrate the highest standards of honesty, probity, openness and integrity in the discharge of their functions. This includes:

compliance with appropriate legislation, codes of conduct, schemes of delegation, conditions of service, standards of appropriate professional bodies, and any other standards, guidelines or instructions which are relevant to the particular service or activity;

Providing a framework within which counter fraud arrangements will flourish; and

Promoting an anti-fraud and anti-corruption culture within the school. Likewise, the Governing Body expects that all external individuals and organisations that it deals with, e.g. suppliers, contractors, partners, service providers, parents and members of the public etc., will act with honesty and integrity and without thought or actions involving fraud, corruption or financial impropriety. In such relationships the principles outlined in this policy must be applied. Where external third parties become aware of any fraud and corruption they should report their concerns promptly to the school.

5. IMPLEMENTATION

5.1 The Governing Body is committed to establishing and maintaining effective arrangements to prevent fraud, corruption and financial impropriety. The Governing Body recognises, however, that these cannot always be prevented and so effective arrangements have been established to detect, report and investigate all incidents or situations where they are suspected.

5.2 The Governing Body is committed to creating and maintaining an anti-fraud and anti-corruption culture which promotes the highest standards of conduct and which enables Governors, school staff, contractors and other external parties to express concerns and suspicions without fear of repercussion or intimidation and in the knowledge that the information will be treated confidentially and will be investigated fully and rigorously. This includes established reporting arrangements through the Whistleblowing Policy which is available on the school web site.

The Governing Body will not tolerate dishonesty on the part of any Governor, school staff member, contractor or any person or organisation involved in any way with the school. Where fraud or corruption is detected the school will rigorously pursue appropriate action against the persons concerned including legal and/or disciplinary action, and wherever possible and deemed appropriate, will take action to recover any losses suffered.

5.3 The Governing Body and the school senior leadership team are committed to working constructively with the police and other relevant agencies in relation to combating fraud, corruption and financial impropriety within the school or within the wider public

sector.

6. AWARENESS

6.1 The Governing Body will seek to ensure that its stance on anti-fraud and corruption is widely publicised both internally and externally to the school. All Governors, employees and other associated bodies/persons with which the school conducts its business will be made aware of its anti-fraud and corruption stance.

6.2 A copy of this policy will be available on the school website. A hard copy can be requested from the school office.

7. PROCEDURE

7.1 It is often the alertness of employees and the public to possible fraud and corruption that brings these to light, and the school has in place arrangements to ensure that such information is properly dealt with. These arrangements are set out in the Whistle-Blowing Policy this is available via the school website or in the blue folder in the staffroom.

7.2 Any employee that suspects fraud or corruption has a duty to report their suspicions. Normally this should be reported to the employee's line manager in the first instance. If this is not possible reporting should be direct to the Head teacher. Any line manager notified of suspicions must notify the Head teacher. In cases where any of these parties is the one suspected of fraud or corruption, one of the other parties should be notified. If suspicions relate to the activities of both the Head teacher and Business Manager these concerns should be reported direct to the Chair of Governors. Alternatively, the contacts and procedures set out in the Whistle-Blowing Policy can be used.

7.3 All reports of suspected fraud or corruption must be formally investigated by the Head teacher or Business Manager or Chair of Governors should suspicions relate to these postholders. Advice will be taken from the Governing Body Responsible Officer, external auditors and HR as needed. Although it is inappropriate to apply a standard methodology to every case, the investigating officer will ensure that:

Each investigation is carried out in a professional and systematic manner Each reported case of suspected fraud or corruption is properly managed and directed.

All matters are recorded adequately Appropriate evidence is sought and secured.

7.4 The head teacher and / or business manager and others who have information about an investigation will regard it as strictly confidential and will not share that information except in the proper furtherance of the investigation.

7.5 Either the Head teacher and / or business manager in consultation with the Chair of Governors, will decide whether any matter should be referred to the police for further investigation or whether disciplinary proceedings should be taken against any employee in accordance with established procedures.

7.6 The Governing Body will be informed when an investigation shows that fraud is likely to have occurred, regardless of the size or monetary value involved.

8. MONITORING, EVALUATION AND REVIEW

8.1 The school will review this policy at least every two years and assess its implementation and effectiveness. The policy will be promoted and implemented throughout the school.

8.2 The Head teacher will report on the effectiveness of the policy to the Governing Body as appropriate