



Cranham Church of England (VA) Primary School

Anti Fraud and Corruption

September 2014

Anne Nolan (Headteacher)

September 2014

Nick Ryan (Chair of Governors)

September 2014

Version	Notes	Date
1	New Policy	September 2014

Anti-Fraud and Corruption

Date	Review Date	Coordinator	Nominated Governor
Sept 14	Sept 17	Anne Nolan	Martin Whittaker

The Fraud Act 2006 clearly states that fraudulent activity 'manifests itself in many different ways including deception, bribery, forgery, counterfeiting, extortion, corruption, theft, conspiracy, collusion, embezzlement, misappropriation of assets, false representation and concealment of material facts'. The Act provides for a general offence of fraud with three ways of committing it, which are:

- by false representation
- by failing to disclose information
- by abuse of position

We believe corruption is the 'giving, soliciting or acceptance of an inducement or reward' which may influence any measures taken by this school.

We are committed to preventing fraud and corruption by creating a culture within the school which deters fraudulent activity and by having in place systems and procedures that will assist in the prevention, detection and the investigation of fraud and corruption.

We wish to conduct all school business in an honest and ethical manner and therefore to prevent and eliminate any fraudulent and corrupt practices. We expect all school personnel to adhere to the Code of Conduct and for them to raise any concerns they may have relating to fraud and corruption.

We believe that in regard to the Human Rights Act 1998, the Data Protection Act 1998 and the Regulation of Investigatory Powers Act 2000, it is our duty to report and investigate all allegations of suspected fraud and any financial irregularities that come to our attention.

We, as a school community, have a commitment to promote equality. Therefore, an equality impact assessment has been undertaken and we believe this policy is in line with the Equality Act 2010.

Aims

- To have in place procedures to prevent fraud and corruption.
- To share good practice within the school.
- To work with other schools to share good practices in order to improve this policy.

Responsibility for the Policy and Procedure

Role of the Governing Body

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The Governing Body has:

- delegated powers and responsibilities to the Headteacher to oversee the financial arrangements on behalf of the Governing Body;
- delegated powers and responsibilities to the Headteacher to ensure all school personnel and stakeholders are aware of and comply with this policy;
- a duty to declare all business interests that they may have;
- responsibility to declare all gifts and hospitality;
- responsibility for ensuring that the school complies with all equalities legislation;
- nominated a designated Equalities governor to ensure that appropriate action will be taken to deal with all prejudice related incidents or incidents which are a breach of this policy;
- responsibility for ensuring funding is in place to support this policy;
- responsibility for ensuring this policy and all policies are maintained and updated regularly;
- responsibility for ensuring all policies are made available to parents;
- the responsibility of involving the School Council in the development, approval, implementation and review of this policy;
- nominated a link governor to visit the school regularly, to liaise with the Headteacher and Financial manager and to report back to the Governing Body;
- responsibility for the effective implementation, monitoring and evaluation of this policy

Role of the Headteacher and Senior Leadership Team

The Headteacher and the Senior Leadership Team will:

- appoint a part time bursar responsibility to manage effective financial systems and to ensure internal controls prevent and detect any frauds promptly;
- ensure all school personnel, pupils and parents are aware of and comply with this policy;
- oversee the financial arrangements on behalf of the Governing Body;
- ensure that the financial resources are being managed in an efficient, economical and effective manner;
- ensure that financial control systems are being maintained;
- ensure that all financial decisions are undertaken in agreement with the Governing Body;
- declare all business interests that they may have;
- declare all gifts and hospitality that is offered to them;
- work closely with the link governor and Financial Manager;
- provide leadership and vision in respect of equality;
- provide guidance, support and training to all staff;
- monitor the effectiveness of this policy;
- annually report to the Governing Body on the success and development of this policy

Finance Manager

The Finance Manager will:

- lead the development of this policy throughout the school;
- maintain effective financial systems and procedures;
- have in place internal controls to prevent fraud and corruption;
- maintain and manage all financial records;
- cooperate with the independent financial auditor;

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- comply with all accounting requirements relevant to the Companies Act;
- deal with all allegations of suspected fraud and financial irregularities;
- report to the Headteacher and the Governing Body all allegations of suspected fraud and financial irregularities;
- work closely with the Headteacher and the nominated governor;
- provide guidance and support to all staff;
- provide training for all staff on induction and when the need arises regarding;
- keep up to date with new developments and resources;
- undertake risk assessments when required;
- review and monitor;
- annually report to the Governing Body on the success and development of this policy

Role of the Nominated Governor

The Nominated Governor will:

- work closely with the Headteacher and the Finance Manager;
- ensure this policy and other linked policies are up to date;
- ensure that everyone connected with the school is aware of this policy;
- report to the Governing Body every term;
- annually report to the Governing Body on the success and development of this policy

Role of School Personnel

School personnel will:

- comply with all aspects of this policy;
- be aware of and comply with the School Personnel Code of Conduct;
- declare all business and personal interests;
- realise it is their duty to report any suspected fraudulent or corrupt activities;
- implement the school's equalities policy and schemes;
- report and deal with all incidents of discrimination;
- attend appropriate training sessions on equality;
- report any concerns they have on any aspect of the school community

Role of the School Council

The School Council will be involved in:

- determining this policy with the Governing Body;
- discussing improvements to this policy during the school year;
- organising surveys to gauge the thoughts of all pupils;
- reviewing the effectiveness of this policy with the Governing Body

Role of Parents/Carers

Parents/carers will:

- be aware of and comply with this policy;

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- be encouraged to report any suspected fraudulent or corrupt activities;
- work in partnership with the school;
- comply with this policy for the benefit of their children;
- be asked to take part periodic surveys conducted by the school;
- support the school Code of Conduct and guidance necessary to ensure smooth running of the school

Raising Awareness of this Policy

We will raise awareness of this policy via:

- the School Handbook/Prospectus
- the school website
- the Staff Handbook
- meetings with school personnel
- reports such annual report to parents and Headteacher reports to the Governing Body

Training

We ensure all school personnel have equal chances of training, career development and promotion.

Periodic training will be organised for all school personnel so that they are kept up to date with new information and guide lines concerning equal opportunities.

Equality Impact Assessment

Under the Equality Act 2010, we have a duty not to discriminate against people on the basis of their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation.

This policy has been equality impact assessed and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any pupil and it helps to promote equality at this school. (See Initial Equality Impact Assessment)

Monitoring the Effectiveness of the Policy

The practical application of this policy will be reviewed annually or when the need arises by the Headteacher, the Finance Manager and the nominated governor.

A statement of the policy's effectiveness and the necessary recommendations for improvement will be presented to the Governing Body for further discussion and endorsement. (See Policy Evaluation)

Linked Policies

▪ Whistle Blowing	▪ School Personnel Code of Conduct
▪ Disciplinary Procedure	▪ Equal Opportunities

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Headteacher:	 Anne Nolan	Date:	September 2014
Chair of Governing Body:	 Nick Ryan	Date:	September 2014

Initial Equality Impact Assessment

Please complete an initial equality impact assessment once this policy has been customised to suit your purposes.

Policy Title	The aim(s) of this policy	Existing policy (✓)	New/Proposed Policy (✓)	Updated Policy (✓)
			✓	

This policy affects or is likely to affect the following members of the school community (✓)	Pupils	School Personnel	Parents/carers	Governors	School Volunteers	School Visitors	Wider School Community

Question	Equality Groups																					Conclusion						
Does or could this policy have a negative impact on any of the following?	Age			Disability			Gender			Gender identity			Pregnancy or maternity			Race			Religion or belief			Sexual orientation			Undertake a full EIA if the answer is 'yes' or 'not sure'			
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	No	No
	✓			✓			✓			✓			✓			✓			✓			✓			✓			
Does or could this policy help promote equality for any of the following?	Age			Disability			Gender			Gender identity			Pregnancy or maternity			Race			Religion or belief			Sexual orientation			Undertake a full EIA if the answer is 'no' or 'not sure'			
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	No	No
	✓			✓			✓			✓			✓			✓			✓			✓			✓			
Does data collected from the equality groups have a positive impact on this policy?	Age			Disability			Gender			Gender identity			Pregnancy or maternity			Race			Religion or belief			Sexual orientation			Undertake a full EIA if the answer is 'no' or 'not sure'			
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	No	No
	✓			✓			✓			✓			✓			✓			✓			✓			✓			

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Conclusion	We have come to the conclusion that after undertaking an initial equality impact assessment that a full assessment is not required.
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Preliminary EIA completed by	Date	Preliminary EIA approved by	Date

Policy Evaluation

Points to be considered	Yes	No	N/A	Please supply evidence
• Policy annually reviewed				
• Policy in line with current legislation				
• Coordinator in place				
• Nominated governor in place				
• Coordinator carries out role effectively				
• Headteacher, coordinator and nominated governor work closely				
• Policy endorsed by governing body				
• Policy regularly discussed at meetings of the governing body				
• School personnel aware of this policy				
• School personnel comply with this policy				
• Pupils aware of this policy				
• Parents aware of this policy				
• Visitors aware of this policy				

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• Local community aware of this policy				
• Funding in place				
• Policy complies with the Equality Act				
• Equality Impact Assessment undertaken				
• Policy referred to the School Handbook				
• Policy available from the school office				
• Policy available from the school website				
• School Council involved with policy development				
• All stakeholders take part in questionnaires and surveys				
• All associated training in place				
• All outlined procedures complied with				
• Linked policies in place and up to date				
• Associated policies in place and up to date				
A statement outlining the overall effectiveness of this policy				

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