



QUEEN VICTORIA PRIMARY SCHOOL

ANTI-FRAUD POLICY

Policy Number:	Stour Vale Policy Document
Approved by:	Full Governing Body
Date:	28th June 2023



Anti Fraud Policy

Version and date	Version 2.1: May 2022
Next review due by	May 2025

Anti Fraud Policy

Stour Vale Academy Trust is committed to creating and maintaining an environment where fraud and corruption will not be tolerated. The Trust aims to be an honest and ethical institution. In order to minimise the risk and impact of fraud, the Trust's objectives are firstly, to create a culture which deters fraudulent activity, encourages its prevention and promotes its detection and reporting and, secondly, to identify and document its response to cases of fraud and corrupt practices.

Definitions of Fraudulent Activity

Fraud is a general term covering theft, deliberate misuse or misappropriation of assets or anything that leads to a financial advantage of the perpetrator or others upon whose behalf he/she acts, even if these "others" are in ignorance of the fraud. Fraud is in fact intentional deceit and for this reason it cannot include negligence.

Corruption is defined as the offering, giving, soliciting or acceptance of an inducement or reward which may influence the action taken by Stour Vale Academy Trust, its staff or governors.

Bribery is a financial or other advantage that is offered or requested with the intention of inducing or rewarding the improper performance of a relevant function or activity, or with the knowledge or belief that the acceptance of such an advantage would constitute the improper performance of such a function or activity.

Examples of Fraudulent Activity

This list is not exhaustive and fraud and corruption can take many different paths

- theft of cash
- non receipt of income
- substitution of personal cheques for cash
- travel and subsistence claims for non existent journeys/events
- travel and subsistence claims over inflated
- manipulating documentation to increase payments received e.g. false overtime claims
- payment of invoices for goods received by an individual rather than the school
- unauthorised borrowing of equipment
- breaches of confidentiality regarding information
- failure to declare a direct pecuniary or otherwise conflicting interest
- concealing a generous gift or reward

- accepting gifts or hospitality in exchange for placing work
- unfairly influencing the award of a contract
- creation of false documents
- deception
- using position for personal reward
- submitting an invoice for work not done
- failure to observe, or breaches of, regulations and/or other associated legislation laid down by the School

Responsibilities of Staff, Members, Directors and Governors

The Trust expects all employees, Members, Directors and Governors will assist in protecting resources and to conduct their affairs within a culture of integrity, honesty and openness. They must pay particular attention to declare

- relationships with contractors (including companies tendering for work)
- relationships with applicants for employment
- personal interests in conflict with the school's interest

They must also ensure that any gifts and hospitality both given and received are recorded as per the Gifts and Hospitality Policy. In addition, care must be taken to ensure they have considered the risk of fraud in any activities undertaken.

Staff Members, Directors and Governors also have a duty to report another member of staff or Members, Directors and Governors whose conduct is reasonably believed to represent a failure to comply with the above.

Reporting a Suspected Fraud

All allegations of suspected fraud and irregularities are to be brought to the attention of the Chief Executive Officer or Chief Finance Officer, unless these individuals are involved in the irregularity in which case the Chair of Directors should be informed. Please refer to the Trust's Confidential Reporting Policy (Whistle blowing).

All reported irregularities will be thoroughly investigated with due regard to the provisions of the Human Rights Act 1998, the Regulation of Investigatory Powers Act 2000 and our School's Equal Opportunities Policy.

Our Trust recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the alleged malpractice. The Trust will not tolerate harassment or

victimisation and will do what it lawfully can to protect an individual when a concern is raised in good faith. This does not mean that if the person raising the concern is already the subject of a disciplinary, redundancy or other procedure, that those procedures will be halted as a result of the concern being reported.

Links with Other Policies

This policy should be read in conjunction with the following Trust policies:

- Confidential Reporting Policy
- Gifts and Hospitality Policy
- Equal Opportunities Policy