

# Fraud Policy 23/24 v2



## Document Control

**A. Confidentiality Notice** This policy document has been approved by the Governing Body of St Modwen's Catholic Primary School and is intended for internal and/or external publication. Where the document is identified for internal use the policy information may not be shared with external agencies or parents without the prior agreement of the Headteacher or authorizing committee.

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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 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.

## 1. 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 practice in order to improve this policy.

## 2. Role and Responsibility of the Governing Body

The Governing Body has:

- appointed a School Business Leader with responsibility to manage effective financial systems and to ensure internal controls prevent and detect any frauds promptly;
- delegated powers and responsibilities to the Headteacher as Accounting Officer 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;
- Finance and Personnel Committee chair to also be the nominated 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;
- nominated a link governor to visit the school regularly, to liaise with the Headteacher and the coordinator and to report back to the Governing Body;
- responsibility for the effective implementation, monitoring and evaluation of this policy

## 3. Role and Responsibility of the Headteacher and Senior Leadership Team

### **THE HEADTEACHER AND THE SENIOR LEADERSHIP TEAM WILL:**

- 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 School Business Leader;
- 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

## 4. Role and Responsibility School Business Leader

### **THE SCHOOL BUSINESS LEADER 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;
- provide an Annual Report and Financial Statement;
- cooperate with the independent financial auditor;
- 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

## 5. Role and Responsibility of the Chair of the Finance Committee

### **THE NOMINATED GOVERNOR WILL:**

- work closely with the Headteacher and the School Business Leader;
- 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

## 6. Raising Awareness of this Policy

### **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

### **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's reports to the Governing Body

## 7. 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.

## 8. 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)

## 9. Monitoring the Effectiveness of the Policy

The practical application of this policy will be reviewed annually or when the need arises by the School Business Leader, the Headteacher 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)

## 10. Linked Policies

Whistle Blowing	School Personnel Code of Conduct
Disciplinary Procedure	Equal Opportunities