Anti-fraud & Bribery Policy

Last Reviewed by:	Pam Sayle
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Governor Ratification:	Finance & Resources Committee
Headteacher:	Rebecca Thompson

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Anti-Fraud & Bribery Policy

1. Introduction

1.1 The School and its Governing Body requires its staff and any other persons acting on its behalf, at all times to act honestly and with integrity and to safeguard the resources for which they are responsible.

1.2 The School and its Governing Body are committed to ensuring that its business is conducted in an open and transparent manner and it will take all appropriate steps to address the risks of fraud and bribery (including theft).

1.3 The School and its Governing Body condemns all acts of bribery or fraudulent behaviour and any cases identified or brought to its attention will be investigated exhaustively and dealt with appropriately.

1.4 The School and its Governing Body are committed to the highest standards of integrity and to ensuring it adheres to and promotes best practice in fraud and bribery prevention.

2. Definitions & Scope

2.1 **Fraud** is 'the intentional distortion of the financial statements or other records by persons internal or external to the organisation, which is carried out to obtain an advantage, avoid an obligation or cause loss to another party

Fraud is therefore a deliberate, dishonest act by an individual or group of people, which can be committed, as per The Fraud Act 2006, by:

- False representation
- Failing to disclose information
- Abuse of position

2.2 **Bribery** is offering, promising or giving someone a financial or other advantage to induce or reward that person to perform their functions or activities improperly as per the Bribery Act 2010, which came into force 1st July 2011. It is also an offence to request, receive or accept a bribe.

The Bribery Act 2010 also introduces a corporate offence of failing to prevent bribery, which requires adequate procedures to be in place and appropriately supported from the very top of the organisation.

2.3 **Theft** is the dishonest appropriation of property belonging to another with the intention of permanently depriving the other of it.

2.4 The above definitions cover such as acts as deception, forgery, extortion, blackmail, conspiracy, collusion, embezzlement, false accounting / false representation, concealment of material facts, the offering of a gift or reward to influence a person's actions and misappropriation.

2.5 Good Corporate Governance requires that the School is firmly committed to dealing with fraud and bribery and will deal equally with perpetrators from inside and outside the School. To this end there will be no distinction made, regarding investigation, between cases that generate financial benefits and those that do not. All cases will be viewed seriously and following investigation the action taken will be in line with the merits of each case and in accordance with other procedures and obligations applicable to the School.

2.6 The Headteacher in conjunction with the Governing Body will:

- Adopt and adhere to Wakefield Council's Anti-Fraud & Bribery Policy which can be found on the Council's Intranet;
- Ensure that its staff and those that represent the School are aware of and adhere to the Council's Policy;
- Work at the highest level to adopt and adhere to the six principles of bribery outlined in the Government's guidance.

The Headteacher has lead responsibility for policy implementation within the School.

2.7 The School and its Governing Body has mitigated the risk of fraud and bribery by:

- segregation of duties
- requirement for staff to declare gifts and hospitality
- procurement policies and procedures, including delegated limits
- staff loan agreements for laptops and mobile phones
- annual review and distribution of the Whistleblowing Policy