

Respect

Kindness

Self-Worth/Perseverance

Forgiveness

Love



# Wittersham CEP School Anti-Fraud, Bribery and Corruption Policy

*At Wittersham Church of England Primary School we believe that every child must be nurtured, valued and empowered to have the highest aspirations for their future and to reach their full potential through the provision of a stimulating, innovative and creative curriculum. We want our learning community to achieve high standards by equipping them with the skills to succeed and inspiring a lifelong love of learning.*

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## Revision History

Version	Date	By	Description
V02	October 2022	G. Hawkins	Policy update

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## Statement of intent

Wittersham Church Of England Primary School is committed to upholding the highest ethical standards and acting with integrity in all business activities. This policy details the school's position on the prevention of fraud, bribery and corruption, and the promotion of an anti-fraud culture.

The school is committed to preventing corruption and eliminating fraud by the way we conduct school business, the culture instilled in staff and the recruitment of trustworthy individuals.

To minimise the risk and impact of fraud and corruption, we aim to create a culture which deters fraudulent and corrupt activity, encourages its prevention and promotes its detection and reporting.

The purpose of this policy is to:

- Establish the responsibilities of the governing board and staff members in observing and upholding our position on fraud, bribery and corruption.
- Provide information and guidance to school staff on how to recognise and deal with concerns over fraudulent activity.
- Promote the early detection of fraudulent and corrupt behaviour.

This policy covers all individuals working for the school at all levels (whether permanent, fixed-term or temporary), and includes governors, volunteers, agents and any other persons associated with the school.

## Legal framework

This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:

- The Bribery Act 2010
- The Fraud Act 2006
- DfE (2022) 'Schools financial value standard (SFVS) and assurance statement'

This policy operates in conjunction with the following school policies and documents:

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- Whistleblowing Policy
- Finance Policy
- Gifts, Hospitality and Anti-bribery Policy
- Conflicts of Interests Policy
- Disciplinary Policy and Procedure
- Staff Code of Conduct
- Governing Board Code of Conduct
- Data and Cyber-security Breach Prevention and Management Plan

## Definitions

Fraud is a criminal offence, which is defined by the Fraud Act 2006 as:

- Deceiving through false representation.
- Failing to disclose information where there is a legal duty to do so.
- Abusing a position of trust.

**Corruption** is the offering, giving, soliciting or accepting of any inducement or reward which may influence the actions taken by the school, its members or officers.

**Theft** is dishonestly appropriating property belonging to another with the intention of permanently depriving the other of it.

**Bribery** is defined by the Bribery Act 2010 as inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages.

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## Roles and responsibilities

The governing board will be responsible for:

- Ensuring that internal controls, procedures and policies are put in place that minimise the risk of fraud and corruption, including theft and bribery.
- Monitoring school procedures in relation to fraud.
- Approving this policy on an annual basis, in liaison with the headteacher and office manager, ensuring that it remains adequate and appropriate for the needs of the school.
- Promoting an anti-fraud and corruption culture within the school.
- Setting the standards for the school and giving their full support to all systems and controls in place to assure probity.
- Ensuring that any business and personal interests of all members of the governing board are declared.
- Reporting any instances of suspected fraud or irregularity to the LA's internal audit and risk officer.
- Ensuring that the school meets its duties under the SFVS to guard against fraud and theft by staff, contractors and suppliers.

The headteacher will be responsible for:

- Ensuring that all employees are aware of this policy and understand any other relevant school procedures.
- Publicising the school's commitment to fighting fraud and corruption.
- Informing the chair of the governing board or the LA's internal audit and risk officer of any indications of fraudulent activity and alleged financial irregularities.
- Reporting to the governing board on all aspects of fraud risk management.

The office manager will be responsible for:

- Developing, implementing and maintaining adequate systems of internal control to prevent and detect fraud.
- Ensuring that all relevant staff are adequately trained on internal controls and procedures that need to be complied with.
- Implementing any changes to the internal controls and procedures that may have been identified as a result of a fraud or irregularity investigation, to prevent further instances of fraud or corruption.
- Informing the headteacher or the chair of governors, as appropriate, of any indications of fraudulent activity and alleged financial irregularities.
- Maintaining an up-to-date Gifts and Hospitality Register.

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All members of staff will be responsible for:

- Upholding the anti-fraud and corruption culture within the school.
- Adhering to the school's policies and procedures in relation to fraud and corruption, including acts of bribery and theft.
- Ensuring they are familiar with the indicators of potential fraud, in addition to common types of fraud and irregularities that may occur within the school.
- Reporting any instances of suspected fraud or irregularity, no matter how trivial they may seem, to the headteacher or chair of the governing board.
- Declaring any business and personal interests held, as well as any offers of gifts or hospitality, which are in any way related to the performance of their duties in relation to the school.
- Ensuring that the school's reputation and assets are protected against fraud.

## Creating an ethical culture

The creation of an ethical, anti-fraud culture underpins all the work done by the school to counter fraud and other irregularities.

All employees will be expected to act with high levels of integrity and to adhere to the rules outlined in this policy. All individuals and organisations that work with the school must act with integrity.

Anti-fraud awareness training will be held for all employees on an annual basis, to ensure employees understand the risk of fraud faced by the school and their personal responsibilities.

Specific training is also provided to employees with responsibility for the school's internal controls.

There are clear reporting mechanisms in place which all employees will be made aware and follow.

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## Preventing fraud and corruption

Fraud and corruption will be minimised through effectively designed and consistently implemented management procedures which deny opportunities for fraud and corruption.

The headteacher and office manager will assess the areas of the school that are most vulnerable to fraud on a termly basis.

Fraud risks will be identified for all areas and processes of the school and assessed in terms of impact (including monetary and non-monetary) and the likelihood of occurrence.

Robust internal controls will be implemented to manage the risk of fraud covering the following areas:

- Approval and authorisation process of transactions
- Access restrictions and transaction controls
- Account reconciliations
- Physical security of assets
- Segregation of responsibilities
- Pre-employment checks

Internal controls will be reviewed on an annual basis by the office manager to ensure they remain effective and are being consistently applied.

Financial procedures and systems will reflect the need for internal checks and internal controls. All employees that are involved in the implementation of these controls will be provided with appropriate training.

Robust IT procedures will be implemented, including restricting access to certain systems.

All new employees will be familiarised with the Staff Code of Conduct and required to follow it at all times.

Recruitment will be conducted in line with the Safer Recruitment Policy and all new employees will be required to declare any business or pecuniary interests, and any other conflicts of interest.

Following a case of fraud or irregularity, the risk management strategy will

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be reviewed to ensure it considers all relevant risks and is effective.

## Indicators of fraudulent activity

Some actions and behaviours may give cause for concern, arouse suspicion and possibly indicate fraudulent activity – a list of such actions and behaviours can be found in [Appendix A](#) – any actions or behaviours in this list will be brought to the attention of the office manager and the individual in question will be closely monitored.

All staff will remain vigilant to the risks of fraud – clarification will be sought from the headteacher or office manager if there are any questions over whether a factor is considered an indicator of fraud.

The school recognises that the presence of any of these indicators may not reflect any actual wrongdoing; however, they will always be investigated appropriately.

## Reporting suspected fraud

Concerns regarding fraudulent activity will be reported to the headteacher or, where there are concerns over the headteacher, the chair of the governing board.

Concerns can be raised in person, via email or telephone, or by using the Fraud reporting form.

Under no circumstances will staff investigate the matter themselves.

Any concerns will be reported immediately in the knowledge that such concerns are treated in confidence and properly investigated.

If a member of staff wishes to report a fraud concern anonymously or wishes to seek advice about how to deal with an allegation of fraud, they should contact the LA whistleblowing hotline on number.

Procedures outlined in the Whistleblowing Policy will be followed to report concerns where the normal reporting procedure is not appropriate. The Whistleblowing Policy can be found on the school's website or obtained from the school office. Employees who raise concerns in good faith will be supported by the school and will not be subjected to any detrimental



treatment as a consequence of their report. Any instances of detrimental treatment against an employee for reporting a suspicion will be treated as disciplinary offences.

Claims will be, in the first instance, investigated by the headteacher to ascertain the basic facts. If the claim concerns the headteacher, the chair of the governing board will ascertain the basic facts.

Subject to the findings, the matter will be reported to the internal audit and risk officer, which may result in a full internal investigation by the LA.

Suspects will not be made aware that they are under investigation until agreed by the internal audit and risk officer.

No information concerning suspicions of fraud or corruption will be reported to the press, media or any other third party. Such disclosures may damage the investigation and any subsequent actions to be taken.

## Recovery of losses

Where practicable, the school will seek to recover any losses incurred as a result of fraud or corruption.

The governing board will be immediately informed by the office manager of any potential loss and provided with details of the case and any recovery action being undertaken.

If an individual under investigation offers money in settlement of losses to the school, the monies may accept without prejudice to any other action the school may wish to take. Money will only be accepted in respect of losses to date and the school will reserve the right to seek the recovery of further losses that may come to light in the future.

The school will only claim under insurance arrangements once all other avenues of recovery have been exhausted

## Gifts and hospitality

All employees will be required to act in line with the Gifts, Hospitality and Anti-bribery Policy.

Any gifts and hospitality given or received will be recorded on the Gifts and

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Hospitality Register.

The school will advise staff, in all circumstances, to consider whether the gift or hospitality is reasonable and justified, and to consider the intention behind the gift.

## Charitable donations

Charitable donations are part of the school's wider purpose. The school supports several carefully selected charities. The school may also support fundraising events involving employees. The school will only make charitable donations that are legal and ethical. No donation must be offered or made in the school's name without the prior approval of the office manager.

## Reporting suspected bribery

Employees will be encouraged to raise concerns about any suspicion of bribery or corruption at the earliest possible opportunity. Issues that should be reported include:

- Any suspected or actual attempts at bribery.
- Any concerns that an employee may be in receipt of bribes.
- Any concerns that an employee may be offering or delivering bribes.

All concerns should be reported following the procedure set out in the school's Whistleblowing Policy.

All reports of bribery will be investigated thoroughly and in a timely manner by the headteacher in the strictest confidence. Employees will be required to assist in any investigation into possible or suspected bribery.

Employees who raise concerns in good faith will be supported by the school and the school ensures that they will not be subjected to any detrimental treatment as a consequence of their report. Any detrimental treatment against an employee for reporting a suspicion will be treated as a disciplinary offence.

The school will invoke disciplinary procedures where any employee is found guilty of bribery, and this may result in a finding of gross misconduct and immediate dismissal. The school may terminate the contracts of any associated persons, including consultants or other workers acting for, or on behalf of the school, who are found to have breached this policy.

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Where appropriate, the school will refer cases to the police for them to consider taking criminal action.

The school will seek to apply appropriate criminal, civil and disciplinary sanctions to all cases of proven bribery.

## Confidentiality

The school understands that the decision to report a concern can be a difficult one to make. Victimisation or harassment of anyone who has made a report will never be tolerated.

Where possible, the identity of the person who made the report will be kept confidential – their identity will only be shared on a need-to-know basis.

## Cyber-crime and cyber-security

The school will be vigilant of cyber-crime and clear cyber-security measures will be implemented, as outlined in the Data and Cyber-security Breach Prevention and Management Plan.

The following measures will be in place specifically relating to addressing the risk of fraud, theft and/or irregularity:

- Firewalls, anti-virus software and strong passwords are used
- Data is routinely backed up
- A restricted number of devices are used to access data

Staff will receive training to ensure they:

- Check the sender of an email is genuine before, for example, sending payment, data or passwords.
- Make direct contact with the sender where an email requests a payment – this is done in person where possible, but at a minimum, staff must use another method other than the direct reply function.
- Understand the risks of using public Wi-Fi.
- Understand the risks of not following payment checks and measures.

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Any suspected incidents of fraud, theft and/or irregularity relating to cyber-security will be reported and managed as outlined in this policy.

## Record keeping

The school will keep financial records and implement appropriate internal controls to provide evidence for business reasons and for making payments to third parties. Employees must make the SBM aware of all hospitality or gifts received or offered over the value of £20 – these will be subject to managerial review.

Employees' expense claims relating to hospitality, gifts or expenses incurred to third parties will be submitted in accordance with the school's relevant procedures.

All invoices, accounts and related documents will be prepared and maintained with the highest accuracy and completeness.

No accounts are kept "off-book".

## Monitoring and review

This policy will be reviewed on an annual basis by the governing board, office manager and the headteacher.  
The scheduled review date for this policy is date.

## APPENDIX A

### Indicators of potential fraud

[This list is not exhaustive and is a guide only. Due to the nature of fraud, indicators may not be exclusive to just one area.]

#### Personal motives for fraud

- Personnel believe they receive inadequate compensation and/or rewards, e.g. remuneration, recognition, job security, holidays or promotions
- Expensive lifestyle, e.g. luxury cars and holidays
- Personal problems, e.g. gambling, alcohol, drugs or debt
- Unusually high degree of competition or peer pressure
- Related party transactions
- Conflicts of interest
- Disgruntled employees, e.g. being recently demoted or reprimanded
- Recent failure associated with specific individual
- Personal animosity or professional jealousy

#### Organisational motives for fraud

- Organisation experiencing financial difficulty
- Commercial arm experiencing financial difficulty
- Tight or unusually tight time deadlines to achieve level of outputs
- Organisational governance lacks clarity, direction or substance
- Organisation closely identified with, or dominated by, one individual
- Organisation under pressure to show results, e.g. budgetary matters or exam results
- Organisation recently suffered disappointment or the consequences of bad decisions
- Organisation wants to expand its scope or obtain additional funding
- Funding award or contract for services is up for renewal or continuation
- Organisation due for a site visit by auditors, Ofsted or others
- Organisation has a for-profit component
- Organisation recently affected by new and/or changing conditions, e.g.

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regulatory, economic or environmental

- Organisation faces pressure to use or lose funds to sustain future funding levels

- Record of previous failure(s) by one or more organisational areas, associated business or key personnel

- Sudden change in organisation practice or pattern of behaviour

Weakness in internal controls

- There is a general lack of transparency about how the organisation works, and its procedures and controls

- Management demonstrates a lack of attention to ethical values – including a lack of communication regarding the importance of integrity and ethics, a lack of concern about the presence of temptations and inducements to commit fraud, a lack of concern regarding instances of fraud, and no clear fraud response plan or investigation policy

- Management fails to specify and/or require appropriate levels of qualifications, experience or competence for employees

- Management displays a penchant for taking risks

- Lack of an appropriate organisational and governance structures with defined lines of authority and reporting responsibilities

- Organisation lacks policies and communication relating to individual accountability and best practice, e.g. relating to procurement, expenses, use of alcohol and declarations of interest

- Lack of personnel policies and recruitment practices

- Organisation lacks personnel performance appraisal measures or practices

- Management displays a lack of commitment towards the identification and management of risks relevant to the preparation of financial statements

- There is inadequate comparison of budgets with actual performance and costs, forecasts and prior performance – there is also no regular reconciliation of control records and a lack of proper reporting to the governing board

- Management of information systems is inadequate, e.g. no policy on ICT security, computer use, verification of data accuracy, or completeness or authorisation of transactions

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- There is insufficient physical security over facilities, assets, records, computers, data files and cash
  - Failure to compare existing assets with related records at reasonable intervals
  - There is inadequate or inappropriate segregation of duties regarding initiation, authorisation, recording transactions, maintaining custody of assets and alike
  - Accounting systems are inadequate, i.e. they have an ineffective method for identifying and recording transactions, no tracking of time periods during which transactions occur, insufficient description of transactions and to which account they should be allocated to, no easy way to know the status of funds on a timely basis, and no adequate procedure to prevent duplicate payments or missing payment dates
  - Purchasing systems and/or procedures are inadequate, e.g. poor or incomplete documentation to support procedure, purchase, payment or receipt of goods or services
  - Subcontractor records and/or systems reflect inadequate internal controls
  - There is a lack of internal, ongoing monitoring of controls which are in place and/or failure to take any necessary corrective actions
  - Management is unaware of or displays a lack of concern regarding applicable laws, e.g. Companies Act 2006, Charities Act 2011
  - Specific problems and/or reportable conditions identified by prior audits or other means of oversight have not been corrected
  - No mechanism exists to inform management, directors, trustees or governors of possible fraud
  - General lack of management oversight
- Transactional indicators
- Related party transactions with inadequate, inaccurate or incomplete documentation or internal controls, e.g. business activities with friends
  - Not-for-profit entity has for-profit counterpart with linked infrastructure, e.g. shared board of trustees, governors or other shared functions and personnel
  - Specific transactions that typically receive minimal oversight

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- Previous audits with findings of questioned costs, evidence of non-compliance with applicable laws or regulations, weak internal controls or an inadequate management response to any of these issues
- Transactions and/or accounts which are difficult to audit and/or subject to management judgement and estimates
- Multiple sources of funding with inadequate, incomplete or poor tracking, failure to segregate funds, or existence of pooled funds
- Unusual, complex or new transactions, particularly if they occur at year end or the end of the reporting period
- Transactions and accounts operating under time constraints
- Cost sharing, matching or leveraging arrangements where industry money or another donation has been put into a foundation without adequate controls to determine if money or equipment has been spent/used and whether it has gone to allowable costs and at appropriate and accurate valuations
- Outside entity provided limited access to documentation
- Travel accounts with inadequate, inaccurate or incomplete documentation or poor internal controls, variances between budgeted amounts and actual costs, claims in excess of actual expenses, reimbursement for personal expenses, claims for non-existent travel, or collecting duplicate payments
- Credit card accounts with inadequate, inaccurate or incomplete documentation or internal controls such as appropriate authorisation and review
- Accounts in which activities, transactions or events involve handling of cash or wire transfers
- Presence of high cash deposits maintained with banks
- Assets which are of a nature easily converted to cash (e.g. small size, high value, high marketability or lack of ownership identification) or easily diverted to personal use (e.g. cars or houses)
- Accounts with large or frequent shifting of budgeted costs from one cost centre to another without adequate justification
- Payroll (including fringe benefits) system has inadequate controls to prevent an individual being paid twice or paid for non-delivery or non-existence
- Payroll (including fringe benefits) system is outsourced but there is poor

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oversight of starters, leavers and payments

- Consultant and subcontract agreements which are vague regarding the work, time period covered, rate of pay or product expected
- There is a lack of proof that a product or service was delivered by a consultant or subcontractor
- Sudden and/or rapid growth of newly contracted or existing education providers, e.g. significant increase in pupil numbers for newly contracted providers

Methods used to commit and/or conceal fraud

Employee indicators such as:

- Eagerness to work unusual hours
- Access to or use of computers at unusual hours
- Reluctance to take leave or seek support
- Insistence on doing their job alone
- Refusal of promotion or reluctance to change their job

Auditor/employee issues such as:

- Refusal or reluctance to provide information or hand over documents
- Unreasonable explanations
- Annoyance or aggressive responses to questions or requests to deter auditors
- Trying to control the audit process
- Auditee/employee blames a mistake on a lack of experience with financial requirements or regulations governing funding
- Promises of cooperation followed by subsequent excuses to limit or truncate cooperation
- Subtle resistance
- Answering a question that was not asked
- Offering more information than asked
- Providing a lot of information in some areas and little to none in others
- Explaining a problem by saying "we've always done it that way" or "someone from the government told us to do it that way"
- A tendency to avoid personal responsibility, e.g. overuse of "we" and "our"

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rather than “I”

- Blaming someone else
- Unreasonable levels of forgetfulness
- Trying to rush the audit process
- Uncharacteristic willingness to settle questioned costs in an attempt to deter further investigation or analysis

General indicators such as:

- A general lack of transparency about how the organisation works and its procedures and controls
- Fabricated explanations to support inability or unwillingness to evidence transactions or assets, such as stated loss of electronic data or theft of business records

Record keeping, banking and other

- Documents that are missing, copied, written in pencil, altered, or that contain false signatures, the incorrect signature or no authorisation where it would be expected
- Deviation from standard procedures, e.g. all files but one handled in a particular way
- Excessive and/or poorly evidenced journal entries and unable to provide an explanation for journal entries
- Transfer to or via any type of holding or suspension account
- Inter-fund company loads to other linked organisations
- Records maintained are inadequate, not updated or not reconciled
- Use of several different banks or frequent bank changes
- Use of several different bank accounts
- Failure to disclose unusual accounting practices or transactions
- Unusual accounting practices or transactions, including:
  - Uncharacteristic willingness to settle questioned costs
  - Non-serial-numbered transactions or out-of-sequence invoices or other documents
  - Creation of fictitious accounts, transactions, employees or charges
  - Writing large cheques to cash or repeatedly to an individual

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- Excessive or large cash transactions
- Payroll cheques with unusual or questionable endorsements
- Payees with similar names or addresses
- Non-payroll cheques written to an employee
- Defining delivery needs in ways that can only be met by one source or individual
- Continued reliance on person or entity despite poor performance
- Treating non-business and/or personal goods or services as business transactions in financial records
- Misuse of a director's loan account facility, e.g. deliberate miscoding of transactions in a director's loan account to gain personal advantage
- Materials goods and/or services fictitiously and erroneously reported as purchased, and evidence has been fabricated to support the claim. This could potentially be evidenced by:
  - Repeated purchases of the same items
  - Identical items purchased in different quantities within a short time period
  - Invoices and statements used to evidence purchase facilitating duplicate transactions or payments
  - Anomalies in the format of purchase invoices
  - Goods or equipment are not used as promised, or they do not work or exist
- Legitimate business assets put to non-business or private use

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## Fraud reporting form

If you have any concerns over fraud, corruption or bribery at the school, please contact the headteacher on [headteacher@wittersham.kent.sch.uk](mailto:headteacher@wittersham.kent.sch.uk) or call **01797 270 329**. Alternatively, you may wish to complete this form and send it to

Wittersham CEP School

The Street, Wittersham

Tenterden, Kent

TN30 7EA

All information is treated in strict confidence.

**If you wish to remain anonymous, please leave the 'Your details' fields blank.**

### Your details

<b>Name:</b>	
<b>Address:</b>	
<b>Contact number:</b>	

### Details of the suspected fraud, corruption or bribery

<b>Name of the person(s) you suspect to be involved in fraud,</b>	
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<b>corruption or bribery:</b>	
<b>Address (if known):</b>	
<b>Department and job title (if known):</b>	

Please use the space below to provide details of your suspicions. Please provide as much detail as possible including dates, times, locations, conversations and the names of any other parties involved. The more information you can provide, the better the chances of the issue being successfully resolved. If necessary, continue overleaf and attach any additional evidence you may have.

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**Please return this form in an envelope marked 'Private and Confidential' to:**

Mr George Hawkins,

Wittersham CEP School

The Street, Wittersham

Tenterden, Kent

TN30 7EA.

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