



Ibstock Community College

Respect and Pride brings Success

Anti-Fraud and Bribery statement of intent and guidance.

Adopted by the Governing Body of Ibstock Community College

March 2020

Review Date: March 2022

Approved by governor: Eddie Hines (Chair of Business Management and Audit Committee)

Signed:

Dated:

Anti-Fraud and Bribery statement of intent and guidance

Ibstock Community College considers fraud to be a very serious matter and the governing body and senior leadership team have a zero-tolerance attitude to 'criminal breaches of business practices' which may be reported to the police.

There is an expectation on all college staff to have the highest standards of honesty, propriety and integrity in the exercise of their duties. The college will not tolerate fraud, impropriety or dishonesty and will investigate all instances of suspected fraud, impropriety, or dishonest conduct by staff or external organisations (contractor or client). Staff must not defraud the college, other staff, pupils, community users, visitors or contractors, in any way.

Occupational fraud and abuses fall into four main categories:

- theft, the misappropriation or misuse of assets for personal benefit;
- bribery and corruption; (Bribery Act 2010)
- false accounting and/or making fraudulent statements with a view to personal gain or gain for another: for example falsely claiming overtime, travel and subsistence, sick leave or special leave (with or without pay);
- externally perpetrated fraud against an organisation.

We are committed to:

- Taking appropriate measures and actions to deter fraud
- Introducing and maintaining necessary procedures to detect fraud
- Investigating all instances of suspected fraud
- Reporting all suspected fraud to the relevant authorities
- Assisting the relevant authorities (including the police) in the investigation and possible prosecution of suspected fraudsters
- Recovering wrongfully obtained assets from fraudsters and;
- Encouraging and supporting employees to report any suspicion of fraud using the appropriate method.

Action to be taken if a suspected fraud is or has occurred:

1. The college has established arrangements for staff to report any concerns that they may have without fear of prejudice or harassment (the college has adopted the Local Authority 'whistleblowing' policy). This applies to concerns relating to fraud and to any other concerns within the context of the Public Interest Disclosure Act 1998.
2. Concerns which should be reported include, but are not limited to, staff committing or attempting to commit:
 - any dishonest or fraudulent act;
 - forgery or alteration of documents or accounts;
 - misappropriation of funds, supplies or other assets;
 - impropriety in the handling or reporting of money or financial transactions;
 - profiting from an official position;
 - disclosure of official activities or information for advantage;
 - accepting or seeking value from third parties by virtue of official position or duties; and
 - theft or misuse of property, facilities or services.

3. The college has considered the adverse impact fraud could have on the college and to its success. The risks have been assessed and are logged in the risk register along with any control procedures deemed necessary. A risk management policy is also in place to ensure every effort is made to manage these risks and to minimise their impact.
4. Fraud and allegations of fraud will be investigated by an appointed suitably qualified senior member of staff independent of the area under suspicion. In most cases this would be the business manager or a delegated member of the SLT. Progress on investigations will be reported to SLT (unless the fraud relates to a member of this group).
5. Staff fraud investigations will be undertaken within the context of the disciplinary policy.
6. The business management and audit committee will be informed of any allegations made and may be required to recommend the outcome to a full governing body meeting. If the matter is considered serious enough, it may be taken directly to a full governing body meeting.
7. Further escalation may be necessary to the police and /or the DFE (Via the EFA) with the agreement of the governing body.