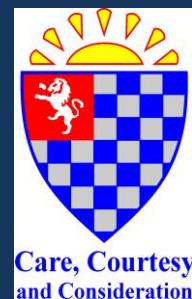


Warren Wood Primary School

Anti-Fraud, Theft, Bribery and Corruption Policy

Approved by Governors 10 March 2025

Review Date February 2028



Introduction

- 1.1 As part of its vision to create a thriving school built on the principles of continuous improvement **Warren Wood Primary School** is committed to safeguarding public funds and maintaining the highest standards of probity. In order to fulfil this commitment, it is crucial that the School's resources are properly safeguarded and the manner in which these resources are used is underpinned by a secure and controlled environment.
- 1.2 This Anti-Fraud, Theft, Bribery and Corruption Policy sets out the School's commitment to creating an anti-fraud culture and maintaining high ethical standards in the use of public funds.
- 1.3 This policy details the respective responsibilities of Senior Officers at Stockport Council, School Governors, all school staff and others in demonstrating appropriate standards of behaviour and in reporting irregularities where these are suspected and outlines the actions that will be taken against those found to have committed fraud against the School.
- 1.4 This School Policy is set out in conjunction with Stockport Council's Anti-Fraud, Bribery and Corruption Policy. *This document can be found on the Council's Intranet Page for Internal Audit. Please refer to the following area of Office on Line:-*

Forms, Data & Guidance/Internal Audit/Fraud Awareness/Anti-Fraud Checklist (Schools)

- 1.5 This School Policy is intended to supplement Stockport Council's Constitution, in particular the Financial Procedure Rules within Part 4 of the Constitution and the Officers Code of Conduct within Part 5. *The Constitution can be found on the Council's website which can be found using the below:*

[http://connect.stockport.gov.uk/kb/Documents/Human Resources/Employee Information/Introduction/Policy - Code of Conduct for Officers.doc](http://connect.stockport.gov.uk/kb/Documents/Human%20Resources/Employee%20Information/Introduction/Policy%20-%20Code%20of%20Conduct%20for%20Officers.doc)

This School Policy is specifically intended to supplement the Council's Anti-Fraud and Corruption Strategy and the Fraud and Irregularity Response Procedure. *These documents can be found on the Council's Intranet Page for Internal Audit. Please refer to the following area of Office on Line :-*

Forms, Data & Guidance/Internal Audit/Fraud Awareness/Anti-Fraud Checklist (Schools)

2. Policy Statement

- 2.1 **Warren Wood Primary School** has a zero-tolerance approach to fraud, theft, bribery and corruption and is committed to ensuring that effective arrangements are in place to prevent, detect, investigate and report fraud. Where a fraud is found to have been committed by any member of staff or other person as defined within the scope of this policy, the School along with the Council will take the appropriate disciplinary and / or legal action.
- 2.2 The School expects high standards of behaviour from all staff, Governors, partners, contractors and in particular expects all those it deals with to uphold the Seven Principles of Public Life as defined by the Nolan Committee (**See Appendix A**). All staff and Governors are expected to act with integrity at all times and to report any suspected irregularities in accordance with this policy.
- 2.3 All staff and Governors are required to comply with the appropriate Code of Conduct as well as the School's Financial Procedure Rules. Any breaches of these rules will be investigated and disciplinary action may be taken.

- 2.4 The Governing Body of **Warren Wood Primary School** will be the owners of this policy and will also monitor adherence to the policy.
- 2.5 The Governing Body will review this policy annually.

3. Scope of the Policy

- 3.1 This Anti-Fraud, Theft, Bribery and Corruption Policy applies to all Warren Wood Primary School staff whether full-time, part-time, permanent, temporary, or agency workers. It also applies to all of the School's Governors and also those working with the School as suppliers, contractors, consultants or partners.
- 3.2 This policy covers the activities of all staff (as defined above) and Governors within their School roles but also covers any action undertaken outside of their School duties which may bring the School into disrepute or may constitute a fraud against the School. Any member of staff or of the Governing Body found to have committed fraud against the School will be dealt with under this Anti-Fraud, Theft, Bribery and Corruption Policy in addition to any external actions that may be taken.

4. Definition of Fraud

- 4.1 Fraud is defined by the 2006 Fraud Act as:

Activity aimed at securing a gain or causing a loss through one of the following:

- False representation (presenting something as true that is known not to be).
- Failure to Disclose (withholding information where there is a requirement to disclose).
- Abuse of position (any action aimed at securing a gain or causing a loss through the position a person holds within the School).

Crucially under the Fraud Act, no gain or loss need occur the intention to defraud is sufficient for a prosecution to proceed.

5. Definition of Theft

- 5.1 The Theft Act 1968 defines theft as:

- A person is guilty of theft if he dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it.
- It is immaterial whether the appropriation is made with a view to gain, or is made for the thief's own benefit.

6. Definition of Bribery

- 6.1 The Bribery Act 2010 defines four new offences:

- offering or paying a bribe
- requesting or receiving a bribe
- bribing a foreign public official
- failing to prevent bribery (a corporate offence).

7. Definition of Corruption

- 7.1 While there is no generally accepted legal definition of corruption, for the purposes of this policy it is taken to define any action which constitutes:
- Dishonesty or breach of trust in carrying out a person's role as a public servant.

8. School and Council Framework

- 8.1 This Anti-Fraud, Theft, Bribery & Corruption Policy exists within an overall framework of policies and procedures designed to protect public monies, and ensure appropriate standards of behaviour from School staff, Governors and other stakeholders. This policy should be read in the context of the overall Council and School framework. Other relevant policies and procedures include:

Stockport Council policies and procedures:

- Anti-Fraud, Bribery & Corruption Policy
- Anti-Fraud & Corruption Strategy
- Fraud & Irregularity Response Procedure
- Anti-Money Laundering Policy
- The Council Constitution
- Staff and Member Codes of Conduct
- Financial & Contract Procedure Rules
- Disciplinary Procedure
- Scheme for Financing Schools
- Recruitment and Selection Procedures

Specific school policies, procedures and documents:

- School Finance Manual and School Financial Procedures
- School Whistleblowing Policy
- School Staff and Governor Codes of Conduct
- Scheme of Delegation
- Statement of Internal Control (SIC)
- Register of Business Interests

9. Standards of Behaviour

- 9.1 While this Anti-Fraud, Theft, Bribery and Corruption Policy has set out legal definitions of the various terms used, the policy is also concerned with the wider behaviours and actions of those within its scope. The public expects high standards of behaviour from all those working within the public sector. This includes not only staying within the law, but exhibiting high ethical standards in all their actions. This section of the policy sets out some of the behaviours expected of School staff, Governors and associated stakeholders. The list is not intended to be exhaustive, but is designed to give some examples that can be applied when making decisions:
- Any business and personal interests must be declared on the correct official form designed for this purpose. This helps protect individuals from any suggestion of

improper conduct and helps the School to demonstrate that all procurement decisions have been taken in the interests of delivering value for money from public funds.

- School staff and Governors must not enter into any purchasing decisions where a business or personal interest has been declared.
- Staff should not seek to benefit in any way from their position with the School beyond the remuneration and any reasonable expenses to which they are entitled. This includes providing any goods or services to the School in a personal capacity for which payment is received.
- School resources must only be used for the purpose of delivering public services. Staff should not use public monies or resources for personal use beyond the School's and the Council's acceptable use policy. Such resources include ICT equipment, telephones (including mobiles), internal post facilities, school headed paper, vehicles and machinery.
- School credit / charge cards must not be used to pay for any expenses for which the School is not directly responsible. This includes personal expenditure as well as that which is payable by any external organisation.
- All claims for additional hours and overtime must be scrupulously honest and must include only the precise number of additional hours or overtime hours that have been worked.
- All claims for expenses must be scrupulously honest and must include only those expenses to which staff are entitled under the terms and conditions of employment and staff expense claims policy.

9.2 Fraud and theft can take many different forms. **Appendix B** gives examples of the possible types of fraud and theft that may take place in a school environment.

9.3 It is important that all school staff and Governors are aware of the warning signs that might indicate fraudulent activity to be taking place in school. In order to enable prompt detection of fraudulent activity, **Appendix B** gives examples of possible indicators of suspicious and fraudulent behaviours and activities.

10. Mechanism for Reporting Suspected Frauds / Irregularities

10.1 Where a suspected fraud or other irregularity is identified, this should be reported to The Headteacher, Chair of Governors or direct to the Internal Audit and Risk Manager at Stockport Council. Where Headteachers or Chairs of Governors' receive a fraud / irregularity referral, these should be reported to the Internal Audit and Risk Manager at Stockport Council.

10.2 Both the School and Stockport Council have in place avenues for staff to report suspected irregularities through their own respective Confidential Reporting Policies (Whistleblowing). Matters will be dealt with where possible in confidence and in accordance with the Public Interest Disclosure Act 1998.

10.3 The Council has a Fraud & Irregularities Panel in place which meets to consider all fraud referrals and ensure matters are investigated thoroughly and appropriate actions taken against staff found to have committed fraud.

11. Roles and Responsibilities : Council Officers

11.1 Chief Executive

The Chief Executive is responsible for ensuring that the Council (including Schools) has an appropriate anti-fraud culture and that key anti-fraud messages are communicated from the

centre.

11.2 Corporate Director, Corporate and Support Services

The Corporate Director, Corporate and Support Services in his capacity as the Council's Section 151 Officer has overall responsibility for establishing and maintaining an effective system of internal control. This system of Internal Control is designed to respond to and manage the full range of risks faced by the Council and Schools including the risks of fraud.

11.3 Corporate Governance Group

The Corporate Governance Group is responsible for ensuring that the Council has adequate anti-fraud arrangements in place. In particular the Group will monitor and review:

- The Council's Anti-Fraud, Bribery & Corruption Policy & Strategy.
- The work of the Fraud & Irregularities Panel.
- The mechanism for providing assurance on the Council's anti-fraud arrangements.
- Arrangements for communicating the Anti-Fraud, Bribery & Corruption arrangements to all staff and other stakeholders.
- Arrangements for training staff on Fraud Awareness and appropriate standards of behaviour.

11.4 Internal Audit

Internal Audit is responsible for reviewing the Council's anti-fraud arrangements and providing assurance to management and Members that these arrangements are adequate and effective.

Internal audit may also make recommendations to management aimed at further strengthening anti-fraud arrangements.

The Internal Audit and Risk Manager is also responsible for receiving all fraud referrals, raising these with the Fraud & Irregularities Panel and ensuring they are investigated in accordance with the outcomes of the Panel discussions.

11.5 Audit Committee

The Audit Committee is responsible for receiving assurances from Internal Audit that the Council and Schools have adequate and effective anti-fraud arrangements in place.

11.6 Fraud & Irregularities Panel

The Fraud & Irregularities Panel is responsible for ensuring that all referrals of fraud or other irregularity are properly investigated and that appropriate action is taken against staff found to have committed fraud against the School or the Council. The Panel will also ensure that any recommendations arising from internal investigations are appropriately implemented by management.

12. Roles and Responsibilities : School Staff and Governors

12.1 The Governing Body

Members of The Governing Body have a specific duty to set an example to the employees of the school and the local community by acting with integrity, honesty and high ethical standards whilst carrying out their duties.

The Governing Body are responsible for the appropriate use of public resources and its key responsibilities to ensure that a sound and effective system of internal controls exists within the school are:

- To have overall responsibility for the management arrangements of the school.

- To promote a culture within the school that concurs with the Nolan Committee's Seven Principles of Public Life (See Appendix A).
- To ensure that internal controls, procedures and policies are put in place that minimise the risk of fraud and theft.
- To be the owners of this Anti-Fraud, Theft, Bribery and Corruption Policy.
- To monitor adherence to this Anti-Fraud, Theft, Bribery and Corruption Policy.
- To annually review this Anti-Fraud, Theft, Bribery and Corruption Policy and ensure it remains adequate and appropriate for the needs of the School.
- To ensure that all Business and Personal Interests of all Governors are declared and recorded accordingly.
- To report any instances of suspected fraud or irregularity to the Internal Audit and Risk Manager at Stockport Council.

12.2 The Headteacher

The Headteacher of the School is expected to set high standards of conduct at all times whilst carrying out their duties.

The Headteacher is also responsible for the appropriate use of public resources and their key responsibilities are:

- To ensure that an anti-fraud culture is in place across the school.
- To ensure that this Anti-Fraud, Theft, Bribery and Corruption Policy is communicated to all school staff.
- To develop, implement and maintain adequate and effective internal controls, procedures and policies.
- To ensure that all staff are aware of the appropriate internal controls, procedures, policies and standards of behaviour.
- To ensure that all relevant staff are adequately trained on internal controls and procedures that need to be complied with.
- To monitor compliance from all School staff with internal controls, procedures and policies.
- To monitor and review the internal controls and procedures to ensure that they are working effectively.
- To ensure that all staff feel able to report suspicions without fear of retribution or other unfavourable treatment.
- To declare any Business and Personal Interests held.
- To ensure that all Business and Personal Interests of all staff are declared and recorded accordingly.
- To ensure that proper recruitment and selection procedures are carried out and that only high quality and honest staff are offered contracts of employment.
- To report any instances of suspected fraud or irregularity to the Chair of Governors or direct to the Internal Audit and Risk Manager at Stockport Council.
- To implement any changes to the internal controls and procedures that may have been identified as a result of a fraud or irregularity investigation, in order to prevent further instances of fraud or irregularity.

12.3 All School Staff

All School staff whether they are full time, part time, permanent, temporary, agency or consultants are expected to maintain a high level of conduct whilst carrying out their duties.

All staff are expected to help protect the public resources that have been entrusted to the school and the key responsibilities are:

- To uphold the Anti-Fraud, Theft, Bribery and Corruption culture within the school.
- To adhere to this Anti-Fraud, Theft, Bribery and Corruption Policy.
- To comply with the school's internal controls, procedures and policies.
- To comply with the Code of Conduct relating to their profession.
- To familiarise themselves with the types of fraud and irregularity that might occur within the school and to be vigilant to such activities in order to enable prompt detection of fraud and irregularity. (See Appendix B)
- To declare any Business and Personal Interests held.
- To report any instances of suspected fraud or irregularity to the Headteacher or the Chair of Governors.

13. Further Guidance and Links

- 13.1 This policy should be read in conjunction with Stockport Council's Anti-fraud, Bribery and Corruption Strategy which sets out how the Anti-Fraud, Theft, Bribery and Corruption Policy will be implemented. This document can be found on the Council's Intranet Page for Internal Audit which can be found using the following link:

http://connect.stockport.gov.uk/kb/Documents/Finance_and_Ordering/Fraud/Anti-Fraud_Bribery_and_Corruption_Policy_Objectives.doc

- 13.2 This policy should be read in conjunction with Stockport Council's Fraud and Irregularity Response Procedure. This document details the steps that will be taken in response to a fraud or other irregularity being identified. This document can be found on the Council's Intranet Page for Internal Audit which can be found using the following link:

http://connect.stockport.gov.uk/kb/Documents/Finance_and_Ordering/Fraud/Anti-Fraud_Bribery_and_Corruption_Policy_Objectives.doc

- 13.3 Any further guidance or advice on the operation of the Policy, Strategy, or Response Procedure can be obtained from the Internal Audit Service.

The Nolan Committee – The Seven Principles of Public Life

SELFLESSNESS

Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

INTEGRITY

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

OBJECTIVITY

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

ACCOUNTABILITY

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

OPENNESS

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

HONESTY

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

LEADERSHIP

Holders of public office should promote and support these principles by leadership and example.

These principles apply to all aspects of public life. The Committee has set them out here for the benefit of all who serve the public in any way.

Possible Types of Fraud, Theft, Bribery and Corruption

The list below gives examples of unacceptable activities, but it is not exhaustive:

- theft of cash (e.g. retaining cash collected for school dinners, trips, uniform, etc. for personal use)
- theft or misuse of school assets and resources (e.g. taking stationery or other school resources, taking away school assets for personal use, personal use of postal facilities)
- submitting false claims (e.g. for travel which did not take place, for un-worked additional hours and overtime.)
- unauthorised purchases of equipment for personal use
- improper use of petty cash for personal purposes
- failing to charge appropriately for goods or services (e.g. not charging for private lettings of school rooms / sports facilities)
- making payments or providing improper gifts or hospitality to a third party in exchange for something that benefits the school, or that unduly influences an action that would affect the school
- processing false invoices for goods or services not received and pocketing the proceeds
- making false entries on the payroll (e.g. inventing a fictitious employee and arranging to be paid an additional salary)
- working elsewhere whilst claiming to be sick
- claiming for payment of inappropriate bonuses
- misusing school financial systems to run a personal business
- improper recruitment (e.g. employing a family member or individual known personally to a member of staff without following appropriate recruitment and selection procedures)
- buying from a supplier or contractor known personally to a member of staff without following the required procurement procedures or declaring a business interest
- accepting payments, gifts or hospitality from anyone; who is, or may be in the foreseeable future tendering or quoting for any contract or works with the school, seeking employment with the school or seeking to influence the admissions process
- separating purchases to avoid tendering / quotation thresholds; and
- suppliers or contractors failing to deliver the agreed goods or services but still being paid in full.

Warning Signs – Possible Indicators of Fraudulent Activity

All School staff have a duty to act properly at all times in the course of their duties. Listed below are a few pointers as to the sorts of things that might give cause for concern and possibly indicate fraudulent activity. It is important to note that any one of these on its own may be perfectly innocent and a function of carrying out normal duties, however a combination of the factors may give cause for concern:

- changes in behaviour (e.g. staff appear under stress without excessive workload, defensiveness, argumentativeness, unusual belligerence, inability to relax)
- lifestyle changes (e.g. exotic holidays, new cars, home improvements, expensive jewellery) – those committing fraud rarely save the proceeds
- ready supply of excuses for errors
- refusal to take holidays
- first to arrive and last to leave
- does not allow anyone else to undertake their work
- refuses promotion
- suppliers will only deal with one person
- new staff leaving quickly.