



CHATHAM & CLARENDON GRAMMAR SCHOOL

Fraud Policy & Procedures

Agreed by Governors: March 2018

1. Introduction

The school aims to be an honest and ethical institution. As such, it is opposed to fraud and seeks to eliminate fraud by the way it conducts school business. This document sets out the school's policy and procedures for dealing with the risk of significant fraud or corruption. In order to minimise the risk and impact of fraud, the school's objectives are, firstly, to create a culture which deters fraudulent activity, encourages its prevention and promotes its detection and reporting and, secondly, to identify and document its response to cases of fraud and corrupt practices.

In order to achieve these objectives, the school has taken the following steps:

1. The development and publication of a formal statement of its expectations on standards of personal conduct, propriety and accountability;
2. The establishment of adequate and effective systems of internal financial and management control (and a clear requirement to comply with them), a Finance & Resources Committee and an Audit Committee which incorporates the responsibility for the Responsible Officer function with an ongoing responsibility to review and report on these systems;
3. The development and publication of a formal statement of the procedures to be followed by employees who have a suspicion of, or concern about, possible or actual malpractice within the school and a fraud response plan which sets out the school's policies and procedures to be invoked following the reporting of possible fraud or the discovery of actual fraud.

These three steps are described in greater detail in the following sections.

2. Personal Conduct

The school aims to promote an organisational culture which encourages the prevention of fraud by raising awareness of the need for high standards of personal conduct. To help ensure that all employees are fully aware of the school's expectations regarding standards of personal conduct, appropriate guidance is provided by the following key statements:

- These regulations are binding on all officers, members of staff, students and constituent parts of the school. Refusal to observe them will be grounds for disciplinary action.

- In disbursing and accounting for all funds, the school must demonstrate that it is adopting high standards of financial probity. Implicit within this regime is the requirement that officers and employees of the school must at all time conduct financial affairs in an ethical manner.
- All members of staff and members of school committees are responsible for disclosing any personal, financial or beneficial interest in any transaction with respect to the school or its related companies, minority interest companies and trading areas.
- Any person who is responsible for placing an order with a supplier (whether a contractor or not) with whom he has a personal interest must disclose this to the Headteacher, Business Manager and Line Manager.
- Officers or employees of the school shall never use their office or employment for personal gain and must at all times act in good faith with regard to the school's interests.
- Budget Holders are expected to adhere to the Financial Regulations at all times and to use their best efforts to prevent misuse or misappropriation of funds and other school property.

Taken together, these represent a statement of the framework within which officers and employees are expected to conduct themselves.

3. Systems of Internal Control

The next line of defence against fraud is the establishment of operational systems which incorporate adequate and effective internal controls designed to minimise the incidence of fraud, limit its impact and ensure its prompt detection. These controls include high-level management controls such as budgetary control (designed to identify fraud which results in shortfalls in income or overspendings against expenditure) and organisational controls such as separation of duties, internal check and staff supervision. Personnel policies are also a key part of setting the culture and deterring fraud. This includes seeking to reduce the risk of employing dishonest staff by checking information supplied by employees and references obtained during the course of the recruitment process, including DBS checks.

The general framework of responsibilities for financial management and the policies relating to the broad control and management of the school are documented in the Financial Regulations. The Financial Regulations are issued and updated periodically by the Business Manager following approval by the Finance & Resources Committee on behalf of the Board. They are binding on all officers, members of staff, students and constituent parts of the school. The Business Manager has, in addition, issued a manual of Financial Procedures which sets out in greater detail the expected controls which should operate within the key operational systems.

The school has also established a Finance & Resources Committee and an Audit Committee with responsibility for the Responsible Officer function which provides advice to management in respect of control matters and which conducts a cyclical programme of reviews of the adequacy and effectiveness of the systems which have been put in place (including those intended to minimise the potential exposure to fraud and corruption).

4. Fraud Response

The Fraud Response Plan sets out the school's policies and procedures for ensuring that all allegations and reports of fraud or dishonesty are properly followed-up and considered in a consistent and fair manner. Prompt and effective action is taken to:

- minimise the risk of any subsequent losses;
- reduce any adverse operational effects;

- improve the likelihood and scale of recoveries;
- demonstrate that the school retains control of its affairs in a crisis; and
- make a clear statement to employees and others that it is not a soft target for attempted fraud.

The plan includes both statements of general policy and specific steps to be taken when circumstances dictate and is necessary in order to reduce the following risks:

- inadequate communication so that action is late or inappropriate;
- lack of leadership and control so that investigators are not properly directed and waste time and effort;
- failure to react fast enough so that further losses are incurred or the evidence required for successful recovery or prosecution is lost;
- adverse publicity which could affect confidence in the school; and
- creation of an environment which, because it is perceived as being ill-prepared, increases the risk of fraud.

The main elements of the school's plan are as follows:

1. All Governors, members of staff, students and constituent parts of the school are required to notify immediately the Business Manager of any financial irregularity, or any circumstance suggesting the possibility of irregularity, affecting the financial procedures, cash, stores or other property of the school.
2. The Business Manager will ascertain whether or not the suspicions aroused have substance. He/she will, if appropriate, conduct a preliminary investigation to gather factual information and reach an initial view as to whether further action is required. The findings, conclusions and any recommendations arising from the preliminary investigation will be reported to the Headteacher. If the Business Manager is implicated or suspected of financial irregularity the initial investigation will be carried out by the Headteacher or Chair of Finance & Resources Committee.
3. The Headteacher will have the initial responsibility for co-coordinating the school's response. In doing this he/she will consult with the Human Resources regarding potential employment issues. The Headteacher will also seek expert legal advice on both employment and litigation issues before taking any further action.
4. The Headteacher is required to notify the Board of any serious financial irregularity. This action will be taken at the first opportunity following the completion of the initial investigations and will involve, inter alia, keeping the Audit Committee and Chair of the Board fully informed, between committee meetings, of any developments relating to serious control weaknesses, fraud or major accounting breakdowns.
5. If evidence of a fraud is forthcoming then the Board will inform the DfE as required by the Funding Agreement and will consider whether or not to refer the matter to the police.

This policy will need to be reviewed in three year's time. The next review date is: March 2021