



Special Partnership Trust



# ANTI-FRAUD & CORRUPTION POLICY

Date Last Reviewed: September 2021

Review Date: September 2022



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## Anti-Fraud & Corruption Policy

A poor control environment can provide opportunity for a motivated person to commit fraud. The Trust has in place a balance of preventative and detective controls to tackle and deter fraud, corruption and other malpractice.

For the purpose of this policy statement fraud includes all irregularities which could normally be described as theft, deception, fraud, corruption, or impropriety. Fraud is always wrong and can occur at any level. In any organisation, it countermands the management at every level and positive action is needed to prevent and discourage it. The prevention of fraud and the protection of the Multi-academy is the responsibility of every member of staff. Schools need good controls and an understanding of key responsibilities for managing fraud. In every case, reported suspicions will be passed to an audit committee who will decide on the subsequent course of action.

When fraud is identified, action will be taken to:

- Limit the damage
- Seek reparation for losses incurred
- Punish the perpetrators
- Revise procedures to prevent any recurrence

### Response to suspected fraud

The Trust has rules which attempt to allocate resources on a fair and even-handed basis. Fraudulent activity circumvents these rules and gives an unfairly generous allocation to one or more individuals to the detriment of all others.

### Reporting of suspected fraud

Any suspicion of fraud should be reported to a member of the Senior Management Team. If it is considered more appropriate (for example, if a member of the Senior Management Team is involved) the suspicions may be reported directly to either the chair of governors, the COO, CEO or Trustees.

### After a suspicion is reported

The Senior Management Team member or governor/trustee will make any initial enquiries considered necessary to validate the report. In every case and as soon as possible after these initial investigations, he or she will pass the matter to the COO/CEO. Even if there is no evidence to support the allegation, the matter must be reported.

### The Sub-Committee

The management of any investigation will be undertaken by a sub-committee setup and controlled by the finance & estate committee. They will:

1. determine whether further investigation is warranted



2. determine whether the matter should be reported to the Chair of Trustees, CEO.
3. determine who should carry out the investigation
4. determine which outside agencies (police, auditors) should be involved
5. assess the risk to the multi-academy
6. determine to whom day to day management of the response should be given
7. allocate responsibility for damage limitation action
8. determine the course of action to recover losses
9. determine the course of action to be taken against wrongdoers
10. evaluate the events which enabled the fraud to occur
11. ensure preventative action is taken

### The Trustees

The board of trustees will notify ESFA, as soon as possible, of any instances of fraud, theft and/or irregularity exceeding £5,000 individually, or £5,000 cumulatively in any financial year. Unusual or systematic fraud, regardless of value, **MUST** also be reported. The following information will be given to the ESFA: -

- Full details of the event (s) with dates
- Financial value of loss
- Measures taken to prevent recurrence
- Whether it was referred to police (if not, why not)
- Whether insurance or the RPA have offset any loss