



The Castle Partnership Trust

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Anti-Fraud & Corruption Policy

Date: January 2021

CEO: Sarah Watson

Acting Headteacher Court Fields School: Polly Matthews

Headteacher Wellesley Park School: Carly Wilkins

Headteacher The Castle School: James Lamb

Headteacher Isambard Kingdom Brunel School: Richard Healey

Due for review: Spring Term 2022

Summary

The most important aspect of our policy and practice is to demonstrate the highest standards of integrity in all we do.

This policy and procedure defines the expected conduct of all staff engaged at the Trust, whether paid staff or volunteers, in relation to deterring and/or detecting fraud and corruption, and who to report it to.

This policy does not attempt to cover every aspect of theft, fraud corruption and bribery. It is intended to promote a framework whereby all members of the Trust's community may work constructively together for the good of the Trust and all who work and learn here.

This policy will be reviewed at least annually and contributions from all categories of staff will be sought and welcomed.

1. Introduction:

1.1 The Castle Partnership Trust is committed to ensuring that it acts with integrity and has high standards of personal conduct. Everyone involved with the Trust has a responsibility in respect of preventing and detecting fraud. All staff, Members, Directors and Governors have a role to play. The Trust also recognises the role of others in alerting them to areas where there is suspicion of fraud.

1.2 Recognising a potential fraud and being able to report it is just as important as the measures to prevent and detect.

1.3 It is the duty of all employees, Members, Directors and Governors at The Castle Partnership Trust to take reasonable steps to limit the possibility of corrupt practices and it is the responsibility of the Responsible Officer and Auditors to review the adequacy of the measures taken by the Trust to test compliance and to draw attention to any weaknesses or omissions.

1.4 Any investigation carried out in relation to alleged irregularities is linked to the Trust's Disciplinary & Dismissals procedure.

2. Definitions:

2.1 Fraud

Fraud is a general term covering theft, deliberate misuse or misappropriation of assets or anything that leads to a financial advantage to the perpetrator or others upon whose behalf he or she acts, even if these "others" are in ignorance of the fraud. Fraud is in fact intentional deceit and for this reason it cannot include negligence.

Fraud incorporates theft, larceny, embezzlement, fraudulent conversion, false pretences, forgery, corrupt practices and falsification of accounts.

Specific examples of fraud include:

- Falsifying or altering accounting records or other documents
- Suppressing or omitting the effects of transactions from records or documents
- Adding records of transactions which have no substance
- Wilful misrepresentation of transactions or other school affairs.

2.2 Corruption

The term 'corrupt practices' is defined for the purpose of this code as the offering, giving, soliciting or acceptance of an inducement or reward which may influence the actions taken by The Castle Partnership Trust, its staff, Members, Directors or Governors.

The areas of school activity which are most susceptible to corruption include:

- Tenders
- Contracts
- Disposal of assets
- Licenses and planning

2.3 Irregularities fall within the following broad categories, all of which are criminal offences –

- **Theft** - the dishonest taking of property belonging to another person with the intention of depriving the owner permanently of its possession;
- **Fraud** - the intentional distortion of financial statements or other records by persons internal and external to the Academy, which is carried out to conceal the misappropriation of assets or otherwise for gain;
- **Bribery and corruption** - The Bribery Act 2010 defines bribery as giving someone a financial or other advantage to encourage that person to perform their function or activities improperly or to reward that person for already having done so.

3. Policy Statement:

- 3.1 For everyone employed by the Trust, it is compulsory to adhere to the requirements of this policy. Failure to comply with any aspect of the policy will constitute a breach of conduct and possibly a criminal offence and will be investigated and addressed in line with the Trust's disciplinary procedures.
- 3.2 The Trust 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 the Trust's business. This document sets out the Trust'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 Trust'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.
- 3.3 We expect and encourage all staff members to raise any concerns they may have relating to fraud and corruption. However, care must always be taken to ensure such concerns are raised in good faith. In the first instance concerns can be raised with the individual's Line Manager or directly with the School Business Managers or Headteachers. The attention of all staff is drawn to our Whistle Blowing Policy.
- 3.4 All staff are required to conform to guidance which is issued by any school within the Trust including what is acceptable and what is not acceptable in terms of gifts, hospitality and acceptance of donations.

4 Detection and Investigation:

- 4.1 All line managers are responsible for the prevention and detection of fraud, corruption and other irregularities. Managers should pay special attention to particular circumstances which may indicate an irregularity.
- 4.2 It is the responsibility of all employees, in particular line managers, to immediately inform the School Business Managers or Headteachers if a fraud or other irregularity is suspected. They should also ensure that:
- any supporting documentation or other evidence is secured; and
 - confidentiality is maintained so as to not prejudice any subsequent investigation.
- 4.3 Reporting of suspected irregularities to the School Business Managers is essential because it:
- ensures the consistent treatment of information;
 - facilitates proper investigation, including compliance with statutory requirements and appropriate liaison at correct stages with the Police; and
 - ensures the proper implementation of relevant system improvements.
- 4.4 The Castle Partnership Trust will take appropriate action following an investigation including disciplinary action, civil recovery and/or referral to the Police.

5 Response to Allegations

- 5.1 The Castle Partnership Trust will work in partnership with other organisations for the detection and investigation of fraud and corruption. These organisations include the Police, the Trust's Auditors, National Anti-Fraud Network and Government departments.