



The Rosary Trust – A Catholic Education Trust

Anti-Fraud and Corruption Policy

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Table of amendments v25.1

Section	Amendment
Section 1	Updated link to current guidance. Added legal definition of fraud
Section 2	Addition of guidance around consideration of use of DfE resources
Section 4	Addition of how the trust will assess the risk and potential impact of fraud
Section 5	New section added: Cyber-enabled and AI enabled Fraud
Section 6	Previously Section 5
Section 7	Previously Section 6. Update to training expectations
Section 8	Previously Section 7. Addition of expectation to designate a Counter Fraud Lead and their responsibilities
Section 9	Previously Section 8. Inclusion of reference to Counter Fraud Lead
Section 10	Previously Section 9
Appendix 1	Section 2: Update to include that disclosures can be made to relevant external bodies. Section 5: Updated reference to current DfE guidance
ESFA to DfE changed throughout the document	

1. Introduction

Academy Trusts must be aware of the risk of fraud, theft and irregularity. The trust is committed to promoting an anti-fraud culture. It already has procedures in place to reduce the likelihood of fraud occurring. These include a scheme of delegation and financial regulations, documented policies and procedures and a system of internal control. All cases of fraud, corruption and irregularity are taken very seriously and it is the trust's policy to prosecute where justified, and to take appropriate disciplinary action where employees are involved.

The Trust wishes to encourage anyone having reasonable suspicions of suspected or actual fraud, malpractice, corruption or irregularity to report them using the trust's Whistleblowing Policy.

This policy has been written in line with the requirements of the Academy Trust Handbook and the government's guide to fraud awareness.

[Fraud awareness: good practice for education and training providers - GOV.UK](#)

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.

Legal Definition of Fraud

Fraud is a criminal offence as defined in the Fraud Act 2006. It includes, but is not limited to:

- Fraud by false representation
- Fraud by failing to disclose information
- Fraud by abuse of position

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 trust, its Staff or Trustees or Directors.

It is the duty of the trust and its employees and Trustees to take reasonable steps to limit the possibility of corrupt practices, and;

The academy uses external providers to review the internal control framework and to assess the adequacy of the measures taken by the trust, to test compliance and to draw attention to any weaknesses or omissions.

2. PURPOSE OF THE POLICY

In administering its responsibilities in relation to fraud and corruption whether it is attempted on the academy or from within it, The Academy is committed to an effective anti-fraud and corruption strategy designed to:

- Encourage prevention;
- Promote detection; and
- Identify a clear pathway for investigation.

The Trust's expectation on propriety and accountability is that Directors, Senior Managers and staff at all levels will lead by example in ensuring adherence to rules, and that all procedures and practices are above reproach.

All staff are expected to act in line with the 'seven Nolan principles of public life' being; selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

The Trust also demands that individuals and organisations that come into contact with the Academy will act with integrity and without thought or actions involving fraud or corruption.

The Trust's Anti-Fraud and Corruption strategy is based on a series of comprehensive and inter-related procedures designed to frustrate any attempted fraudulent or corrupt act. These cover:

- Establishing an Anti-Fraud Culture (Section 3);
- Prevention (Section 4);
- Cyber-enabled and AI enabled Fraud (Section 5);
- Detection and Investigation (Section 6);
- Training (Section 7)

The Trust will consider relevant DfE fraud awareness resources, fraud alerts and published indicators of potential fraud when updating this policy and the fraud and corruption response plan.

The Trust is also aware of the high degree of external scrutiny of its affairs by a variety of bodies including:

- Parents
- Wider Community
- Partner & Service Organisations

- Department for Education
- Education, Skills and Funding Agency
- External Auditors
- HM Revenue & Customs
- Parliamentary Committees
- Government Departments

The Trust has a Comprehensive Response Plan to suspected Fraud and Corruption and this is attached in **Appendix 1**.

3. ESTABLISHING AN ANTI-FRAUD CULTURE

The Trust is determined that the culture and tone of the organisation is one of honesty and opposition to fraud and corruption.

There is an expectation and requirement that all individuals and organisations associated in whatever way with The Trust will act with integrity, and that Trust staff at all levels will lead by example in these matters.

The Trust's staff are an important element in its stance on fraud and corruption and they are positively encouraged to raise any concerns that they may have on these issues where they are associated with The Academy's activity. This can be done in the knowledge that such concerns will be treated in confidence and be properly investigated.

If necessary, a route other than their normal line manager may be used to raise such issues and examples of such routes are:

- Member of the Trust Board;
- Chair of Local Governing Body;

Members of the public and customers are also encouraged to report concerns through any of the above avenues.

However, we recognise that, in some cases, our normal procedures will not be appropriate or adequate and employees will need to come forward on a confidential basis to express their concerns. Further detailed guidance on how to raise concerns confidentially is contained within the Trust's Whistleblowing Policy.

The Leadership Team are responsible for following up any allegation of fraud or corruption received and will do so by following the guidance of the Fraud and Corruption Response Plan attached at **Appendix 1**.

Any abuse of this process by raising unfounded malicious allegations is a serious disciplinary matter.

The Trust has a zero tolerance approach to fraud and will deal swiftly and thoroughly with any member of staff who attempts to defraud the Academy.

4. PREVENTION

The trust recognises that a key preventative measure in the fight against fraud and corruption is to take effective steps at the recruitment stage to establish, as far as possible, the previous record of potential staff in terms of their propriety and integrity. Staff recruitment is therefore required to be in accordance with procedures laid down by the trust and in particular to obtain written references regarding known honesty and integrity of potential staff before employment offers are made.

The trust employees are expected to follow any Code of Conduct related to their personal professional qualifications and also to abide by the trust's Code of Conduct. The role that appropriate staff are expected to play in the trust's framework of internal control is governed by the trust's policies and procedures.

All Trustees (or relevant post name) and staff are required to declare in a register held by the Head teacher (or relevant post name), any offers of gifts or hospitality which are in any way related to the performance of their duties or not. Declarations should be made on the register of any offer, regardless of the offer being accepted or declined. If offers are disproportionate to the relationship between the trust and the other party, then this could be perceived as bribery or corruption.

The trust's Finance Manual and supporting policies place a duty on all staff to act in accordance with best practice when dealing with the affairs of the trust.

Significant emphasis has been placed on the thorough documentation of financial systems, and every effort is made to continually review and develop these systems in line with best practice to ensure efficient and effective internal controls.

The adequacy and appropriateness of the trust's financial systems is independently monitored by the trust's internal and external auditors and their recommendations are reviewed and considered by the Finance, Risk and Audit.

The Trust will regularly assess the risk and potential impact of fraud. This will include:

- identifying areas of operation particularly vulnerable to fraud (for example payroll, procurement, income collection, use of subcontractors)
- ensuring fraud risks are recorded on the trust's risk register, with assessment of likelihood and impact
- reviewing fraud risks when new projects, systems or significant changes are introduced
- reporting significant fraud risks and mitigation to the Audit and Risk committee and Board of Trustees

5. CYBER-ENABLED AND AI-ENABLED FRAUD

The Trust recognises that many frauds are now cyber-enabled and that artificial intelligence can be misused to support fraudulent activity. The Trust will:

- maintain appropriate technical and organisational controls to reduce cyber security risks
- implement robust verification procedures for changes to bank details, payment instructions or urgent/unusual payment requests, including independent call-backs using known contact details
- be alert to the risk of AI being used to impersonate staff and other stakeholders and will not act on unusual payment instructions without independent verification

- not pay any cyber ransom demands, in line with DfE expectations that public funds should not be used for that purpose

6. DETECTION AND INVESTIGATION

The preventative systems, particularly internal control systems, within The Trust have been designed to provide indicators of any fraudulent activity, although generally they should be sufficient in themselves to deter fraud.

It is often the alertness of staff and the public to such indicators that enables detection to occur and the appropriate action to take place when there is evidence that fraud or corruption may be in progress.

Despite the best efforts of financial managers and auditors, many frauds are discovered by chance or *'tip-off'* and The Trust has in place arrangements to enable such information to be properly dealt with.

All suspected and detected Fraud will be investigated following the guidance of the Fraud and Corruption Response Plan attached at **Appendix 1**.

Depending on the nature and anticipated extent of the allegations, the Trust will normally work closely with auditors and other agencies such as the police to ensure that all allegations and evidence is properly investigated and reported upon.

As a consequence of The Trust's zero tolerance approach, the Trust's Disciplinary Procedures will be used where the outcome of the investigation indicates improper behaviour by members of staff.

The Trust will normally wish the police to independently prosecute offenders where financial impropriety is discovered.

7. TRAINING

The Trust recognises that the continuing success of its Anti-Fraud and Corruption strategy and its general credibility will depend largely on the effectiveness of programmed training and responsiveness of staff throughout the organisation.

To facilitate this, the Trust is committed to induction training for all Trustees, local governing bodies and employees to ensure that their responsibilities and duties are clear and to make them aware of the Trust's policies.

Ongoing fraud awareness training will also be carried out and will cover, in proportion to the role:

- general fraud and corruption risks
- cyber enabled fraud (including phishing, invoice fraud and banking fraud)
- AI-enabled impersonation risks
- how to recognise and report concerns.

This training will be refreshed periodically and whenever there are significant changes in fraud risks or relevant guidance.

8. RESPONSIBILITIES

The Trustees are ultimately responsible for the Trust's system of internal control which is designed to provide assurance regarding the safeguarding of assets, the maintenance of proper accounting records and the reliability of financial information.

The Chief Accounting Officer carries overall responsibility for the prevention of fraud but these responsibilities lie with all the Trust's employees.

The Leadership Team are responsible for the day to day prevention and detection of fraud and should ensure that they:

- Identify the risks to which systems, operations and procedures are exposed;
- Develop and maintain effective controls to prevent and detect fraud; and
- Ensure that agreed controls are being complied with and are subject to independent verification.

The Trust will designate a Counter Fraud Lead to coordinate counter-fraud activity. This will be the CFO. Their responsibilities will include:

- Maintaining and periodically updating this policy and the Fraud and Corruption Response Plan
- Promoting fraud awareness and ensuring all stakeholders receive regular fraud awareness training
- Supporting with the completion and review of fraud risk assessments and ensuring fraud risks are captured on the trust's risk register
- Promoting and monitoring the effectiveness of whistleblowing arrangements in relation to fraud
- Liaising with internal and external auditors and other advisors on fraud related matters .

All employees are responsible for:

- Acting with propriety in the use of the Trust's resources whether they are involved with cash, payment systems and receipts, or in dealing with suppliers, contractors, other partners and customers; and
- Reporting details immediately, as detailed in this policy, if they suspect that there is evidence of irregular or improper behaviour or that a fraud may have been committed.
- Acting in line with the 'seven Nolan principles of public life' being; selflessness, integrity, objectivity, accountability, openness, honesty and leadership.
- Registering all offers of gifts and hospitality

9. CONCLUSION

The Trust has in place a clear network of systems and procedures to assist it in the fight against fraud and corruption. It is determined that these arrangements will keep pace with any future developments in both preventative and detection techniques regarding fraudulent or corrupt activity that may affect its operation.

To this end, the Trust maintains a continuous overview of such arrangements through, in particular, its Chief Accounting Officer, Chief Financial Officer, the Finance, Risk & Audit Committee, Internal Auditors and External Auditors and the Counter Fraud Lead.

10. REVIEW

This policy will be reviewed on an ongoing basis in line with best practice and legislative requirements, and at least every 3 years.

All questions regarding this procedure should be addressed, in the first instance, to the Chief Accounting Officer.

APPENDIX 1: FRAUD AND CORRUPTION RESPONSE PLAN

1. INTRODUCTION

The Trust is committed to the values of probity and accountability, but the determined perpetrator will always find a way round systems and procedures. It is therefore necessary for all managers to be aware of what is required in the event of being notified of a suspected fraud. This document sets out the process for staff who wish to notify any suspicions and also how the Trust should respond.

2. NOTIFYING SUSPECTED FRAUD

Suspected fraud can be discovered in a number of ways but in all cases it is important that staff feel able to report their concerns and should be made aware of the means by which they are able to do so:

Chief Accounting Officer

If an employee discovers a suspected fraud, then it should be reported to the Chief Accounting Officer as a matter of urgency. Whilst the Chief Accounting Officer should establish as many details as possible (by discussion with the notifying person only) he/she should formally report the incident to the Chair of Trustees.

In some cases, the notifying individual may prefer to report the suspicion to an independent officer or even to remain anonymous, therefore, the Trust has other means available.

Direct To Chair of Trustees

Where an employee wishes to report suspicions or evidence of fraud or corruption, but does not have the confidence to report this through the Chief Accounting Officer, they are encouraged to approach the Chair of Trustees.

Further detailed guidance on how to raise concerns confidentially is contained within the Whistleblowing Policy.

Where an individual reasonably believes that internal reporting routes are not appropriate, or that a concern has not been properly addressed, they may make a protected disclosure to a relevant external body such as the DfE.

3. INVESTIGATING SUSPECTED FRAUD

Initial Steps

Once fraud is suspected it is critical that any investigation is conducted in a professional and timely manner aimed at ensuring that the current and future interests of both the Trust and the suspected individual(s) are protected. The latter is equally important as a suspicion should not be seen as guilt to be proved.

It is also crucial that the notifying employee does not feel threatened. The Trust undertakes to protect the identity of such employees and not to release the source of notification at any time during the investigation.

For each notified suspicion the Chief Accounting Officer will appoint an “Investigating Officer” to be in charge of the investigation on a day-to-day basis. This can be a member of the Leadership Team.

Subsequent Steps

The Investigating Officer must:

1. Initially assess whether there is a need for any employee to be suspended. The decision should be kept under review at all stages of the ensuing investigation;
2. Identify a course of action (what, who, when, how, where);
3. Identify the reporting process (who by, to whom, when and how) and ensure that strict confidentiality is continuously maintained; and
4. Bring the matter to the attention of the Finance, Risk & Audit Committee.

It is important, from the outset, to ensure that evidence is not contaminated, lost or destroyed. The Investigating Officer will therefore take immediate steps to secure physical assets, including computers and any records thereon, and all other potentially evidential documents, and ensure that appropriate controls are introduced to prevent further loss.

The Investigating Officer will:

1. Ensure that a detailed record of the investigation is maintained. This should include a chronological file recording details of, for example:
 - i. telephone conversations;
 - ii. discussions, meetings and interviews;
 - iii. records/documents reviewed;
 - iv. tests and analyses undertaken; and
 - v. results and their significance

The file should be indexed and all details recorded no matter how insignificant they initially may appear.

2. Ensure that evidence is obtained, appropriately categorised and retained:
 - i. prime documents;
 - ii. certified copies;
 - iii. physical items;
 - iv. secondary evidence (e.g. interview transcripts etc.);
 - v. circumstantial evidence; and
 - vi. hearsay.
3. Ensure interviews are conducted in a fair and proper manner, and that contemporaneous notes are taken detailing who was present and who said what.

4. LIAISON WITH THE POLICE

The experts at investigating fraud are the police. They will also advise on the likely outcome of any intended prosecution. Initial contact with the police should only be undertaken following discussion between the Chief Accounting Officer and the Investigating Officer. It is the policy of the police to welcome early notification of suspected fraud.

If the police decide that a formal investigation is necessary, all staff should co-operate fully with any subsequent requests or recommendations. All contact with the police following their initial involvement will usually be via the Investigating Officer.

Where the police decide to formally investigate this will not prejudice any internal disciplinary procedures; these should continue as normal. However, the internal investigation and the police should be co-ordinated to make maximum use of resources and information.

5. REPORTING FRAUD AND ATTEMPTED FRAUD

Department of Education

The Trust must refer to the DfE reporting fraud guidance for any suspected fraud or financial irregularity.

[Report fraud or financial irregularity to DfE - GOV.UK](#)

The Board of Trustees must notify the DfE, as soon as possible, of any instances of fraud, theft 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 is required:

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

Reporting will be undertaken by the Chief Accounting Officer or the Chair of Trustees at the earliest opportunity.

Board of Trustees

The Leadership Team will report to the Board of Trustees all cases of fraud and attempted fraud, detailing the nature and extent of the fraud and any implications for the association's internal control system.

The Trust will maintain a register of all incidents of fraud and attempted fraud, which will be reviewed by the Chair of the Finance, Risk & Audit Committee at least termly.

Interim Report

As soon as the initial 'detection' stage of the investigation has been completed an interim confidential report, which may be verbal, but is more likely to be in a written format, should be made by the Investigating Officer to the Chief Accounting Officer and the Chair of Trustees and any other officer decided upon at the preliminary stage.

The Interim Report should include;

- i. the findings to date;
- ii. the interim conclusions drawn from those findings; and
- iii. a recommendation to continue the investigation, if this is justified by the initial findings.

If it is decided to continue the investigation the future reporting arrangements and any changes to the planned action should be confirmed by the Chief Accounting Officer.

Final Report

This report will supersede all other reports and be the definitive document on which leadership (in a disciplinary situation) and possibly the police (in a criminal situation) will base their initial decisions.

The format of the Final Report will not always be the same as each case is unique, but will frequently set out:

- When the fraud was initially discovered;
- The method of discovery;
- The period the fraud covers;
- Who the suspects are, their position in the Trust and their responsibilities;
- Details of how the investigation was undertaken;
- The facts and evidence which were identified;
- Amount of loss and chances of recovery;
- Action taken against perpetrator;
- Action taken in respect of involving the police;
- Action taken to prevent recurrence;
- Summary of findings and recommendations, both regarding the fraud itself and any additional work required on the system weaknesses identified during the investigation.

All reports must be substantiated by the strongest evidence and avoid contents that could be considered to be defamatory in the event of the report being made public.

Defamation in law is defined as:

“the publication (i.e. communication) of a statement which tends to lower a person in the estimation of right-thinking members of society generally or which tends to make them shun or avoid that person”.

6. RECOVERY ACTION

The Trust will take appropriate steps, including legal action if necessary, to recover any losses arising from fraud, theft or misconduct. This may include action against third parties involved in the fraud or whose negligent actions contributed to the fraud.

The Trust will review how the fraud has occurred and any lessons learned and ensure that these lessons are communicated to staff along with any associated training.

Appendix 2: Fraud – Staff Summary

DO	DON'T
<p align="center">Make a note of your concerns</p>	<p align="center">Be afraid of raising your concerns</p>
<ul style="list-style-type: none"> • Record all relevant details, such as the nature of your concern, the names of parties you believe to be involved, details of any telephone or other conversations with names, dates and times and any witnesses. • Notes do not need to be overly formal, but should be timed, signed and dated. • Timeliness is most important. The longer you delay writing up, the greater the chances of recollections becoming distorted and the case being weakened. 	<ul style="list-style-type: none"> • The “Whistleblowing” Policy provides protection for employees who raise reasonably held concerns through the appropriate channels. • You will not suffer discrimination or victimisation as a result of following these procedures and the matter will be treated sensitively and confidentially.
<p align="center">Retain any evidence you may have</p>	<p align="center">Convey your concerns to anyone other than authorised persons</p>
<ul style="list-style-type: none"> • The quality of evidence is crucial and the more direct and tangible the evidence, the better the chances of an effective investigation. 	<ul style="list-style-type: none"> • There may be a perfectly reasonable explanation for the events that give rise to your suspicion. Spreading unsubstantiated concerns may harm innocent persons. (Section 2 of the Fraud Response Plan sets out who you should notify)
<p align="center">Report your suspicions promptly</p>	<p align="center">Approach the person you suspect or try to investigate the matter yourself</p>
<ul style="list-style-type: none"> • In the first instance, report your suspicions to your Chief Accounting Officer. If this action would be inappropriate, further guidance on disclosure can be found in the Anti-Fraud and Corruption Policy and the Trust’s Whistleblowing Policy. 	<ul style="list-style-type: none"> • There are special rules relating to the gathering of evidence for use in criminal cases. Any attempt to gather evidence by persons who are unfamiliar with these rules may weaken the case.