



Hove Park School Anti-Fraud Policy

Date Ratified:	Frequency of Monitoring Report:	Frequency of Review:	Next Review Date:
24/03/14		Every two years	Spring Term 2016
Governor Link:	Staff Link:	Committee:	
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1. Introduction

- 1.1 Hove Park School {the School) is committed to protecting the public funds that it administers. As with other large organisations, the size and nature of its services puts the School at risk from loss due to fraud and corruption both internal and external to it.
- 1.2 For from being a victimless crime, fraud and corruption deprives vital Services of the resources that they need.
- 1.3 The School does not tolerate fraud and corruption and is committed to reducing the opportunity to the lowest possible risk. It will ensure that:
- Everyone within the organisation or within partner organisations take responsibility for the prevention and detection of fraud and corruption.
 - Key policies and procedures are up to date, effective and there is compliance.
 - A full Fraud Risk Assessment is maintained and an Annual Counter Fraud Programme is complied, agreed and executed.
 - All suspected cases of fraud and corruption are reported to the Head of Audit & Business Risk, the exception being housing benefit related (non-employees) that are reported to the Housing Benefit Investigation Team.
 - All suspected cases of fraud and corruption are risk assessed, investigated fairly and objectively within a clear ethical framework and where found to be present, appropriate action will be taken including disciplinary, criminal, civil or regulatory and any losses recovered.
 - Cases of fraud and corruption are referred to other agencies as appropriate and work jointly including the use of fraud intelligence.
 - Any decision to refer a case (except housing benefits) to the Police will be made by the Head of Audit & Business in Risk consultation, as appropriate.
 - Officers, members and partners receive proper guidance regarding anti-fraud and corruption issues.
 - High standards of internal control are achieved and promoted.
 - There is a safe environment to report suspected cases of fraud and corruption.
 - Individuals and organisations, e.g. suppliers, contractors and service providers with whom it deals, will act towards the School with integrity and without thought or actions involving fraud and corruption.
- 1.4 An important part of the School's approach is the Counter Fraud Strategy, which is aimed primarily to guide members and employees on the School's approach to the serious issues of fraud and corruption. It is also published on the School's website so that residents, businesses and School partners are fully aware of the commitment to the prevention and detection of fraud and corruption.

2. What is Fraud and Corruption?

- 2.1 The Fraud Act 2006 created a new general offence of fraud which may be committed in three ways:
- Fraud by false representation (e.g. using a false identity to gain benefits, job or tenancy).
 - Fraud by failing to disclose information (e.g. failing to disclose income when making a claim for benefits).
 - Fraud by abusing a position of trust (e.g. misusing clients' funds).
- 2.2 It also created new offences of:
- Obtaining services dishonestly.
 - Possessing, making and supplying articles for use in frauds.
 - Fraudulent trading applicable to non-traders.
- 2.3 Corruption is defined as "the offering, giving, soliciting or acceptance of an inducement or reward that may influence the actions taken by the body, its members or officers." It may encompass a variety of wrongful acts, such as bribes, kickbacks and abuse of public office. Like fraud corruption is a criminal offence.
- 2.4 Theft is defined by Section 1 of the Theft Act 1958 as "dishonestly appropriating property belonging to another with the intention of permanently depriving the other of it." It therefore includes stealing any property belonging to the School or which has been entrusted to it including equipment, cash, data, and client funds.

3. Corporate Framework and Culture

- 3.1 The School has a range of interrelated policies that provide a corporate framework to counter fraudulent activities. These have been formulated in line with appropriate legislative requirements and include:
- Standing Orders and Financial Regulations
 - Codes of Conduct for members and employees
 - Surveillance Policy
 - Sound internal control systems
 - Effective Internal Audit
 - Disciplinary Procedure
 - Fraud & Corruption Response Plan
 - Whistleblowing Policy (Confidential Reporting), Anti-Fraud hotlines to enable the raising of genuine concerns and suspicions
 - Code of Data Matching Practice and Sanction Policies
- 3.2 The School believes that a culture of honesty and openness is a key element in tackling fraud and mobilises the honest majority to create a strong counterfraud and corruption culture. School's students, employees, partners, contractors and the public should be in no doubt about its zero tolerance approach and efforts against the dishonest minority.

4. Prevention

The School recognises that fraud and corruption are costly and is therefore proactive in seeking to design fraud and corruption out of existing and new systems. The School has robust internal controls covering its assets, people, finances and data.

5. Deterrence

The School has a counter fraud programme of work to create strong disincentives to those who may be tempted to breach its defence. For example the School seeks maximum publicity for a successful prosecution where the resulting sentence is considered to be a deterrent to others. In cases where financial loss to the School has occurred, it will take appropriate action to recover the loss and costs associated with the action.

6. Detection and Investigation

It is the responsibility of management to maintain an effective internal control environment aimed at preventing and detecting fraud and corruption. The School's Financial Regulations require all suspected cases of fraud and corruption (except housing benefits) to be reported to the Head of Audit & Business Risk (verbally or in writing). The School will seek to apply appropriate criminal, civil and disciplinary sanctions to all cases of proven fraud and corruption.

7. Awareness and Training

The School recognises the need for effective fraud and corruption awareness training and responsiveness of members and employees. The School will ensure that training is provided to all members and employees. The investigation of fraud corruption centres on the School's Internal Audit Team for corporate and Housing Benefit Investigation Team for Housing Benefit specific. Learning and Development Plans of staff involved in this work will reflect the need for appropriate current and future training requirements.

8. Conclusion

This strategy is aimed at reducing the School's losses due to fraud and corruption to make more resources available for the delivery of its services. The strategy fully supports the School's desire to maintain a culture of openness, fairness, trust and dignity.

The School has in place a clear framework of systems and procedures to deter and investigate fraud and corruption. It will ensure that these arrangements are fair, monitored and updated to keep pace with future developments in preventative, deterrent and detection techniques.

Annual SFVS Audit Check

Action	Lead person	Carried out
Governors to abide by the school's constitution, the Scheme for Financing Schools, Contract Standing Orders for Schools, and act within the law in an open, honest and trustworthy manner	Monitored by Chair of Governors and Chair of Finance Committee over the past year.	
Ensure an effective system of internal financial control exists within the school, that it is clearly documented in the school's own Financial Procedures and that those controls operate effectively.	Deputy Head/Business Manager (with assistance of Bursar)	
Budget managers to assess risk involved in their area of responsibility; to review the control systems, and to ensure that controls are being complied with properly by undertaking regular checks.	Deputy Head/Business Manager in conjunction with Budget Holders (with assistance of Bursar)	
Ensure recruitment procedures established to ensure all staff are vetted correctly prior to commencing their employment.	Deputy Head/Business Manager (assisted by person carrying out HR procedures)	
Ensure statements of employment or undertaking include reference to the school's Fraud Policy	Deputy Head/Business Manager (assisted by person carrying out HR procedures)	
Ensure Disciplinary procedures are in place to deal any acts of misconduct by school employees.	Chair of Staffing Committee (or similar)	
Inclusion of Fraud policy and Whistle-blowing policy in Staff Handbook	Deputy Head/Business Manager (assisted by person carrying out HR procedures)	
Inclusion of Fraud policy and Whistle-blowing policy in staff induction programmes	Deputy Head/Business Manager (assisted by person carrying out HR procedures)	
Inclusion of Fraud policy and Whistle-blowing policy in governor's induction programmes	Chair of Governors (assisted by person carrying out HR procedures)	
Staff should not accept personal gifts, hospitality, or benefits of any kind from a third party that may be seen to compromise their integrity.	Deputy Head/Business Manager to maintain a gifts and hospitality register	
Publicise the school's commitment to fighting fraud, e.g. providing information on its website and school documents, such as the prospectus	Headteacher	