



Anti-Fraud and Corruption Policy

This policy is in line with the Fraud Act of 2006 and the Bribery Act of 2010

1. Introduction

1.1 Droylsden Academy is a large and complex organisation and is committed to discharging its responsibility to safeguard public funds and to the highest standards of integrity. It is committed to fighting fraud and corruption whether attempted from inside or outside. Droylsden Academy is committed to having effective measures to prevent and detect fraud and corruption.

1.2 Droylsden Academy expects all members and employees to carry out their duties in accordance with appropriate legal requirements, internal codes of practice, rules and regulations and to act at all times with honesty and probity in the discharge of their functions.

1.3 In carrying out its duties and responsibilities, Droylsden Academy is determined to do everything it reasonably can to protect itself and the public from fraud and corruption and is committed to the rigorous maintenance of this Anti-Fraud & Corruption Strategy which will provide a framework for:

- encouraging fraud deterrence and prevention;
- raising awareness of fraud and corruption and promoting their detection;
- performing investigations and facilitating recovery of losses;
- invoking disciplinary proceeding and referrals to the Police; and
- monitoring, publishing and updating the Strategy and its related procedures and performance.

1.4 Droylsden Academy also expects that all outside individuals and organisations, including suppliers, contracting partners and claimants will act toward it with honesty and integrity without thought or actions involving fraud and corruption.

1.5 This Strategy is part of Droylsden Academy's Anti-Fraud and Corruption Framework and sits alongside policies and guidance including the Whistleblowing Policy and employees' Code of Conduct.

2. Definitions

Droylsden Academy defines the following:

Theft is 'the dishonest taking of property belonging to another person with the intention of permanently depriving the owner of its possession'.

Fraud is 'the intentional distortion of the financial statements or other records by persons internal or external to the organisation which is carried out to conceal the misappropriation of assets or otherwise for gain.' This differs from "theft" where no attempt at concealment is made. It is also important to distinguish this from negligence and accidental error where no intent exists. This may involve:

- falsification or alteration of accounting records or other documents
- suppression or omission of the effects of transactions from records or documents
- recording transactions which have no substance
- willful misrepresentation of transactions or of Droylsden Academy's state of affairs

Corruption is 'The offering, giving, soliciting or acceptance of an inducement or reward which may influence actions taken by the body, its members or officers.' Main areas of activity, which are susceptible to corruption may include:

- contracts
- asset disposal

- planning consents and licenses
- employment of staff (see 4.6 below)

3. Operating Culture

3.1 Droylsden Academy is determined that the culture and tone of the organisation meets the expectations of the Committee on Standards of Public Life and the Standards Board for England. It is committed to the ten principles of public life: objectivity, openness, stewardship, leadership, accountability, honesty & integrity, selflessness, personal judgement, duty to uphold the law and respect for others.

3.2 Employees are expected, and are positively encouraged, to raise any concerns relating to fraud and corruption, of which they become aware. These can be raised in a number of ways including with the employees line manager or a member of the Senior Leadership Team. Full information about concerns is set out in the Whistleblowing Policy documents.

3.3 Droylsden Academy expects members and employees to lead by example in ensuring opposition to fraud and corruption, and in ensuring adherence to rules and regulations, and to relevant Codes of Conduct, and that all procedures and practices are beyond reproach. The responsibility of the Senior Leadership Team is to ensure that all employees are aware of what is expected of them.

3.4 Droylsden Academy requires all individuals and organisations with whom it deals in any capacity to behave towards the Academy with integrity and without intent or actions involving fraud and corruption.

3.5 Droylsden Academy employees and members of the public are important elements in the stance against fraud and corruption and are positively encouraged to raise any concerns they may have on these issues which may impact on the Academy activities using the Academy's Whistleblowing Strategy or the Academy's Complaints Procedures.

3.6 Although Droylsden Academy encourages its employees to report concerns acting in good faith, any maliciously motivated and unfounded allegations may be dealt with through its disciplinary procedures.

4. Prevention

4.1 It is the corporate responsibility of Droylsden Academy to put in place preventative measures to fight fraud and corruption and to minimise risk of fraud and corruption.

4.2 Droylsden Academy's Procedures, Rules, Schemes of Delegation together with Financial Regulations, Codes of Conduct and Codes of Practice set out a framework for dealing with the affairs of Droylsden Academy and all members and employees have a duty to comply with their provisions. This includes the duty of employees to act within statutory regulations.

4.3 Governors must operate in accordance with Droylsden Academy's Procedures, Rules and Code of Conduct.

4.4 Droylsden Academy has put in place systems and procedures to manage and discharge its functions in an efficient and effective manner. These systems incorporate internal controls to prevent and deter fraud and corruption. Employees must ensure that working practices comply with the systems.

4.5 Thorough documentation, including manuals and operating procedures, effective control is expected of all financial and operational systems and they must be issued to relevant staff. These must be regularly reviewed to ensure they comply with best practice and provide effective internal controls.

4.6 Employee recruitment is required to be in accordance with procedures laid down in the Academy's human resources procedures and, in particular adequate checks made appropriate to the posts before any appointment is confirmed.

4.7 Employees are required to disclose any offers of gifts, hospitality or interests that could conflict with the interests of Droylsden Academy or might affect their judgement. The General Office will maintain a register to record and monitor disclosures.

5. Detection and Investigation

5.1 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.

5.2 It is the responsibility of all employees, in particular line managers, to immediately inform the Headteacher 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.

5.3 Reporting of suspected irregularities to the Headteacher 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.

5.4 Droylsden Academy will take appropriate action following an investigation including disciplinary action, civil recovery and/or referral to the Police.

Response Plan

5.8 Droylsden Academy will work in partnership with other organisations for the detection and investigation of fraud and corruption. These organisations include the Police, the Academy's Auditors, National Anti-Fraud Network and Audit Commission.

6. Training

6.1 Training and guidance is vital in maintaining the effectiveness of this Strategy and its general credibility. Droylsden Academy supports induction and work-related training, particularly for employees involved in internal control systems, to ensure that their responsibilities and duties are regularly highlighted and reinforced and best practice is followed.

7. Review

7.1 Droylsden Academy 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.

7.2 To this end Governors will continuously review these arrangements on a two-yearly basis, in particular this Strategy.