



SHIRELAND
COLLEGIATE ACADEMY TRUST

Shireland Collegiate Academy Trust Policy

Fraud Policy

2018

Committee and Date Approved	Audit Board – September 2018
Category	Recommended
Next Review Date	Annually unless change in legislation – Autumn 2019
Policy Availability	Trust Website
Officer Responsible	FD of the Trust

The Trust, all Academies within the Trust and Shireland Learning Limited must comply with this policy.

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Introduction

Shireland Collegiate Academy Trust aim to be an honest and ethical institution. As such, it is opposed to fraud and corruption and seeks to eliminate fraud by the way it conducts Trust 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 objectives are, firstly, to create a culture which deters fraudulent activity, encourages its prevention, promotes its detection and reporting and, secondly, to identify and document its response to cases of fraud and corrupt practices.

In order to achieve these objectives, the Trust has taken the following steps;

1. The development and publication of a formal statement of its expectations on standards of personal conduct, propriety and accountability,
2. The establishment of adequate and effective systems of internal financial management control (and a clear requirements to comply with them),
3. The development and publication of a formal statement of the procedures to be followed by anyone who has a suspicion of, or concern about, possible or actual malpractice within the Trust's Whistleblowing Policy

In addition to the above three steps the Trust will ensure the implementation and compliance by;

4. The establishment of an Audit Committee with a clear accountability and evaluation process,
5. The appointment of an independent Responsible Officer function with an on-going responsibility to review and report on these systems,
6. The appointment of external Auditors,
7. The development of an internal assurance programme with a clear reporting line to the Audit committee.

Statement of Expectations

The Trust and its Academies aim to promote an organisational culture, which encourages the prevention of fraud by raising awareness of the need for high standards of personal conduct. To help ensure that all employees are fully aware of the Trust's expectations the key points have been summarised below:

- The Trust and its Academies must demonstrate that it is adopting high standards of financial probity. Implicit within this regime is the requirement that officers and

employees of the Trust and its Academies must at all-time conduct financial matters in an ethical manner.

- All officers and employees of the Trust and its Academies committees are responsible for disclosing any personal, financial or beneficial interest in any transaction with respect to the Trust and/or Academy or its related companies, minority interest companies and trading areas.
- Any person who is responsible for placing an order with a supplier (whether a contractor or not) with whom he has a personal interest must disclose this via the agreed process for declaration of interest
- All officers and employees of the Trust and its Academies shall never use their office or employment for personal gain and must at all times act in good faith with regard to the Trust and its Academies interests.
- All officers and employees of the Trust will declare any gift or hospitality via the gift and donations process.
- All officers and employees of the Trust must adhere to the Finance Regulations at all times and use their best efforts to prevent misuse or misappropriation of funds and other Trust and/or Academy property.
- All officers and employees must subscribe to the Nolan seven principles of public life

None compliant with the above may be grounds for disciplinary action.

Systems of Internal Control

To minimise the ability for fraud, the Trust has established operational systems, which incorporate adequate and effective internal controls designed to minimise the incident of fraud, limit its impact and ensure its prompt detection. These controls include high level management controls such as budgetary control (designed to identify fraud which results in shortfalls in income or overspendings against expenditure) and organisational controls such as separations of duties, internal check and staff supervision. Personnel policies are also a key part of setting the culture and deterring fraud. This includes seeking to reduce the risk of employing dishonest staff by checking information supplied by employees and references obtained during the course of the recruitment process, including DBS checks.

The general framework of responsibilities for financial management and the policies relating to the broad control and management of the Trust and Academies are documented in the Financial Regulations. The Financial Regulations are issued and updated periodically by the Finance Director following approval by the Resource Committee on behalf of the Trust. They are binding on all officers, members of staff, students and constituent parts of the Trust and Academies. These regulations are further supported by other guidance and processes which is available on the learning gateway for the Trust and its academies.

Compliance

Shireland Collegiate Academy Trust has established a reporting framework to ensure compliance and drive accountability, through the establishment of an Audit Committee, the appointment of an independent Responsible Officer function, the appointment of external auditors and an annual internal assurance programme.

The Responsible Officer function provides advice to management in respect of control matters and conducts a cyclical programme of reviews of the adequacy and effectiveness of the systems, which have been put in place (including those intended to minimise the potential exposure to fraud and corruption). To add further reassurance to this work, each year the appointed external Auditors complete a half-yearly regulatory audit in addition to the annual audit.

An internal assurance programme, focusing on compliance with policies and procedures, which is reported and summarised to the Audit committee to drive self-improvement and deter any non-adherence, further enhances all of this work.

Underlining all of the above is an annual risk process, which looks at the areas for fraud and corruption and reviews controls to ensure they are adequate

Whistleblowing

The Trust has a Whistleblowing Policy. This policy clearly shows how serious the Trust takes the protection against fraud and misuse of public funds. This document is available on the Trust website.

The Whistleblowing Policy sets out the Trust's procedures for ensuring that all allegations and reports of fraud or dishonesty are properly followed-up and considered in a consistent and fair manner to:

- Minimise the risk of any subsequent losses;
- Reduce any adverse operational effects;
- Improve the likelihood and scale of recoveries;
- Demonstrate that the Trust and its academies retain control of its affairs in a crisis and;
- Make a clear statement to employees and others.

The policy clearly stated how fraud and corruption will be dealt with and lists external organisations where staff and contractors can seek support and help.

The policy includes both statements of general policy and specific steps to be taken when circumstances dictate to reduce the following risks:

- Inadequate communication;
- Lack of leadership and control so that investigators are not properly directed and waste time and effort;

- Failure to react fast enough so that further losses are incurred or the evidence required for successful recovery or prosecution is lost;
- Adverse publicity which could affect confidence in the Trust and/or Academy and;
- Creation of a process which, because it is perceived as being ill prepared, to deal with the issue of fraud.