



Date of review: June 2022

Date of next review: July 2024

Responsible person: Business Manager

Anti-Fraud and Corruption Policy

Fraud, Corruption and Bribery

Fraud is a criminal offence. The Fraud Act 2006 defines 'fraud' as:

1. Deceit, the intention to deceive or secrecy: and
2. (a) an actual loss or gain;
(b) The intent to cause loss to another or expose them to the risk of it;
3. Dishonesty.

Offences of fraud can include abuse of position, making of a false statements, failure to disclose information, obtaining services dishonestly, deception, theft, misappropriation, embezzlement, forgery, corruption, extortion, false accounting, false representation, concealment of material facts, acts of conspiracy, collusion and aiding and abetting any act of dishonesty.

Bribery is a criminal offence and the Bribery Act 2010 introduces a clearer regime for tackling bribery. A definition is – inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages.

The Boulevard Academy has a Gifts & Hospitality policy statement which can be referred to for further detail.

Academy Policy

The Trustees are committed to take action to prevent, detect and deter fraud, corruption and bribery in all its activities.

This policy must be read in conjunction with the following policies – Whistle-blowing, Financial Policies & Procedures, including delegation, Gifts & Hospitality and Safer Recruitment procedures.

The academy will ensure probity in administration and governance by taking positive action against all forms of fraud, corruption or bribery affecting academy business whether it is from internal or external sources.

Members & Trustees

There is a specific duty expected of the Trustees to set an example to the employees of the academy and the community by acting with integrity, honesty and in a trustworthy manner befitting the academy.

The Academy Trustees will set the standard for the academy and therefore give their full support to all systems and controls in place to assure probity. All Members and Trustees will complete annually a register of business interests for themselves and close family members and will advise the academy of any changes to this declaration at any time throughout the year.

The Trust has a legal responsibility for the academy budget and will ensure a sound system of internal control is in place in the use of delegated and other funds given to the academy.

Principal and Senior Staff

The Principal and senior members of staff are expected to set high examples of conduct in their day to day work, which are beyond reproach.

The Principal, with assistance from the academy's Business Manager, bears overall responsibility for systems of financial control and may be liable to be called to account for specific failures.

However, all senior staff and other managers are responsible for ensuring an effective system of risk management and internal control exists within their areas of responsibility and that those controls operate effectively. Managers must take a lead in terms of fraud prevention and will be held accountable for not undertaking this as part of their position of trust and area of responsibility.

The Principal is responsible for ensuring the academy's policy in relation to fraud is communicated to all staff.

All Staff

This policy applies to all employees of the academy. It also applies to consultants, temporary staff, contractors and vendors and any other parties with a business relationship with the academy

All members of staff are expected to share this commitment to help the academy protect the public funds to which it has been entrusted. All staff have a duty to assist the academy in the prevention of fraud and are expected to alert their line manager where they believe the opportunity for fraud exists because of poor procedures or lack of appropriate supervision. All employees are expected to report any cases of suspected fraud, no matter how trivial they may seem.

All staff are expected to be fully accountable during their employment with the academy, to follow the academy's policies, financial procedures and any relevant professional code and to comply with all laws and regulations applicable to the academy's business.

As stewards of public funds, staff must have, and be seen to have, high standards of personal integrity. Staff should not accept personal gifts, hospitality, or benefits of any kind from a third party that may be seen to compromise that integrity.

External Audit

External Audit will report on the existence and effectiveness of control systems and as part of the audit process may advise on best practice. The findings and recommendations of reports will be implemented promptly.

Prevention

Prevention is the most desirable factor in dealing with any fraud. Unfortunately, not all systems are always fool proof in stopping the committed fraudster.

Trustees, academy management and staff will carry out their responsibilities as outlined above and implement specific action as set out in the Risk Register.

Detection

All staff have an obligation to report concerns to academy management. All staff will be made aware of the academy's Whistle-blowing Policy.

Investigation

Where any matter that might constitute fraud, theft, corruption or bribery comes to the attention of any trustee, the Principal or member of the SLT it will be in the first instance investigated by the Principal to ascertain the basic facts.

It is recognised that being subject to an investigation can be a stressful experience, therefore all investigations will be handled as quickly as possible and confidentially to ensure the person under investigation is dealt with in an appropriate and timely manner.

The Trustee Board views fraud as a serious offence against the academy and employees will face disciplinary action if there is evidence to support any allegation of fraud. Disciplinary action may be taken in addition to, any criminal proceedings, depending on the circumstances of each case.