

Anti-Fraud and Corruption Policy

RIDGEWAY EDUCATION TRUST

Approved by Trust Board: 11 December 2018

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Ridgeway Education Trust Anti-Fraud and Corruption Policy

Purpose

The purpose of this policy is to reinforce Ridgeway Education Trust's intolerance of fraud, corruption and bribery. Compliance with this Anti-Fraud and Corruption Policy will assist in the delivery of more effective risk management, on which Ridgeway Education Trust has produced its own separate policy.

Introduction

Ridgeway Education Trust will not tolerate fraud, corruption or abuse of position for personal gain, wherever it may be found.

Ridgeway Education Trust considers that all instances of fraud, corruption and other dishonesty endanger the achievement of its policies and objectives as they divert its limited resources from the provision of education. There is a clear recognition that the abuse of the resources, assets and services undermines the reputation of Ridgeway Education Trust and its schools and also threatens its sound financial standing.

This policy statement

- Defines fraud, corruption and bribery.
- Identifies the scope of the policy.
- Sets out Ridgeway Education Trust's intended culture and stance against fraud, corruption and bribery.
- Identifies how to raise concerns and to report malpractice.
- Sets out responsibilities for countering fraud.

Definitions

i. Fraud

Fraud is a range of abuse and malpractice that is covered by the Fraud Act 2006, as amended from time to time.

Fraud can be defined as an abuse of knowledge or financial position that is done deliberately to create a financial gain for the perpetrator or for a related person or entity and/or cause a loss to another. It can take place in many ways; withholding information, deliberately misleading, misrepresenting a situation to others or by abuse of position. Irrespective of the definition applied, fraud is always deceitful, immoral, and intentional and creates a financial gain for one party and/or a loss for another.

Gains and losses do not have to be direct. A gain to a related party or company through intentional abuse of position, albeit not directly to the officer involved, is

still fraudulent. In the same way, using the name of Ridgeway Education Trust or its schools to procure personal goods and services is also fraudulent; where there is deliberate abuse of position to make a gain in the form of goods and services at a discount price or to get the Academy to pay for them.

ii. Corruption

Corruption will normally involve the above with some bribe, threat or reward being involved.

iii. Bribery

This is covered by The Bribery Act 2010, as amended from time to time.

Bribery can be defined as:

- giving, promising to give, or offering a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- giving, promising to give or offering a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accepting payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accepting a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- retaliating against or threatening a person who has refused to commit a bribery offence or who has raised concerns under this policy.

Facilitation Payments

Facilitation payments are not tolerated and are illegal. Facilitation payments are unofficial payments made to public officials in order to secure or expedite actions.

Gifts and Hospitality

This policy is not meant to change the requirements of the Ridgeway Education Trust's approach to gifts and hospitality as set out within the Finance Manual and its Scheme of Delegation. These make it clear that all offers of gifts and hospitality of a value of £25 or over should be registered whether they are accepted or not.

Scope of Policy

The Policy Statement applies to all Ridgeway Education Trust members and directors, members of its schools' local governing bodies, and all employees (full time, part time, temporary and casual) who work for Ridgeway Education Trust and its schools.

Ridgeway Education Trust expects that individuals and organisations (e.g. partners, suppliers, contractors, and service providers) with which it deals will act with integrity and without thought or actions involving fraud and corruption. Where relevant, Ridgeway Education Trust will include appropriate clauses in its contracts about the consequences of fraud, bribery and corruption. Evidence of such acts is most likely to lead to a termination of the particular contract and will

normally lead to prosecution.

Ridgeway Education Trust recognises the importance of the seven principles of public life and expects all directors, governors, employees and those acting as its agents to conduct themselves according to them.

These are:

- **Honesty** - Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
- **Integrity** - Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.
- **Selflessness** - Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.
- **Objectivity** - In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.
- **Openness** - Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.
- **Accountability** - Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.
- **Leadership** - Holders of public office should promote and support these principles by leadership and example.

Through observance of these principles Ridgeway Education Trust requires its members, directors, school governors, employees and its agents to be alert to the possibility of fraud, corruption and dishonesty in all their dealings.

Ridgeway Education Trust also requires that those employees responsible for its systems and procedures should design and operate systems and procedures which endeavour to minimise losses due to fraud, corruption, and other dishonest action and abuse.

Culture & stance against fraud and corruption

Ridgeway Education Trust is determined that the culture and tone of the organisation will be one of honesty and opposition to fraud and corruption of any

kind. It expects that its members, directors, school governors and employees at all levels to lead by example in ensuring adherence to legal requirements, financial rules, codes of conduct and prescribed procedures and practices.

Ridgeway Education Trust implements and maintains systems of accountability and control to ensure that its resources are properly applied in the way it intended. These systems include, as far as is practical, adequate internal controls to detect not only significant errors but also importantly, fraud and corruption. Instances of internal fraud, corruption and bribery will be dealt with according to the Trust's Disciplinary Procedures.

The Ridgeway Education Trust's Finance Committee is responsible for overseeing its financial management and its internal control framework. The Audit Committee recommends to the Board arrangements for independent review of compliance with the control framework and reviews independent audit /responsible officer assurance and compliance reports.

Raising Concerns

Members, directors, governors and employees are an important element in the Ridgeway Education Trust's defence against fraud and corruption; they are expected to raise any concerns that they may have on these issues where they are associated with the Ridgeway Education Trust's activities.

Ridgeway Education Trust's senior management and directors will be robust in dealing with financial malpractice of any kind.

Members, directors, governors and employees of Ridgeway Education Trust should follow the guidance issued in the **Whistleblowing Procedure**.

All concerns reported, by whatever method, will be treated in confidence and will be reviewed and investigated by a director, governor or member of staff deemed to be appropriate and best placed to do so. This may mean that, depending on the level, type and details of the concerns raised, that they are investigated by senior Ridgeway Education Trust managers, directors, governors or in the case of very serious concerns, the Police.

Responsibility for this Policy

The Executive Headteacher in conjunction with the Director of Finance & Services, has overall responsibility for the maintenance and operation of this policy.