



CReATIVE Education Provision

**IWYS
Alternative Education
Anti-Fraud and
Corruption
Policy**

Introduction

This policy applies to all employees, and other individuals performing functions in relation to the provision, such as agency workers and contractors.

It is important to the IWYS Alternative Education that there are proper procedures in place to guard against fraud and corruption and ensure best use of public funds. If there are any concerns that cannot be raised through the normal channels, then the Whistleblowing policy should be followed.

This procedure has been drawn up in consultation with the Professional Associations and Trade Unions.¹

Background

The Department for Education's (DfE) Scheme for Financing schools (March 2018) includes the following provision, at paragraph 2.17.

"All schools must have a robust system of controls to safeguard themselves against fraudulent or improper use of public money and assets.

The Head of provision must inform all staff of IWYS Alternative Education policies and procedures related to fraud and theft, the controls in place to prevent them; and the consequences of breaching these controls. This information must also be included in induction for new IWYS Alternative Education staff and contractors.

Adequate arrangements should be in place to guard against fraud and theft by staff, contractors and suppliers and note any instance of fraud or theft detected in the last 12 months.

This policy document assists IWYS Alternative Provision in meeting these requirements.

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 statement, 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 IWYS Alternative Education has an Anti-Bribery Policy and procedure which can be referred to for further detail/ reference.

Policy Statement on anti-fraud and corruption

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

The Head of provision and the Senior Leadership team are responsible for ensuring that there are sound systems of financial control designed to minimise the risk of fraud or error.

All IWYS Alternative Education staff are expected to report any cases of suspected fraud, no matter how trivial they may seem either to their manager, through the whistleblowing process.

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

Investigation

Where any matter that might constitute fraud, theft, corruption, or bribery comes to the attention of a member of IWYS Alternative Education, staff contact should be made with the Head of provision. A decision will be made to contact either the LA or the Police. If the concern is about the head of provision the advice in the Whistleblowing policy should be followed. The first course of action will be to identify the most suitable person to undertake a preliminary fact-finding investigation. In practice this will normally be the Headteacher.

Deterrence

IWYS Alternative Education views fraud as a serious offence, 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.

IWYS Alternative Education is committed to deterring potential cases of fraud through the implementation of robust systems and procedures and will act quickly and efficiently where fraud is alleged, leading to the most appropriate outcome.

It will take all steps possible to ensure appropriate penalties are sought in cases where fraud is proven, strenuously attempt recovery of any monies lost as a result of fraud and thoroughly assess the systems and processes to ensure fraud is minimised in future. IWYS Alternative Provision policy is communicated to staff and the wider IWYS Alternative Education community.

Date Policy Reviewed/Amended:	June 2023
Proprietor/Head of Provision	Charmaine Baines
Review Date:	June 2024

Implementation of Fraud Policy

Action	Lead person	Carried out
Governors to abide by the Scheme for Financing IWYS Alternative Educations, the IWYS Alternative Education's Financial Value Standard (SFVS), the IWYS Alternative Education's Schedule of Financial Delegation 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 IWYS Alternative Education, that it is clearly documented in the IWYS Alternative Education's own Financial Procedures and evidenced by compliance with the SFVS.	Headteacher (with assistance of finance officer)	
Take responsibility for reviewing the control systems in place and undertake regular checks for assurance that controls are being correctly applied.	Headteacher in conjunction with Budget Holders ²	
Ensure recruitment procedures established to ensure all staff are vetted correctly prior to commencing their employment. ³	Headteacher (assisted by person carrying out HR procedures)	
Ensure statements of employment or undertaking include reference to the IWYS Alternative Education's Fraud Policy	Headteacher (assisted by person carrying out HR procedures)	
Ensure Disciplinary procedures are in place to deal any acts of misconduct by IWYS Alternative Education employees.	Chair of Staffing Committee (or similar)	
Inclusion of Fraud policy and Whistle-blowing policy in Staff Handbook	Headteacher (assisted by person carrying out HR procedures)	
Inclusion of Fraud policy and Whistle-blowing policy in staff induction programmes	Headteacher (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	

² The term 'Budget Holder might refer to a different member of staff staff such as the finance officer or School Bursar

³ Schools should already have in place strong controls around Safeguarding that will assist with this. ⁴ Schools may be able to find more information on the HCC Grid to assist with this.

	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. ⁴	Headteacher to maintain a gifts and hospitality register	
Publicise the IWYS Alternative Education's commitment to fighting fraud, e.g. providing information on its website and IWYS Alternative Education documents, such as the prospectus	Headteacher	

Appendix B

8 Contacts

Shared Internal Audit Service

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Shared Anti-Fraud Service

Nick Jennings –Counter Fraud Manager

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