

Anti-Fraud, Bribery and Corruption Policy

Audience:	REAch2 Staff Local Governing Bodies Cluster Boards Trustees
Ratified:	REAch2 Finance and Resources Committee December 2023
Other related policies:	Whistleblowing Policy Finance Policy and Finance Procedures Financial Scheme of Delegation Gifts, Hospitality and Anti-bribery Policy Conflict of Interest Policy Staff Expenses Policy Non-staff Expenses Policy
Policy owner:	Chris Perry, Chief Finance Officer
Review:	December 2026

At REAch2, our actions and our intentions as school leaders are guided by our Touchstones.



Leadership

Finding the leader in all of us.



Inclusion

Realising the greatness in our difference.



Learning

Creating exceptional opportunities for learning.



Enjoyment

Loving what we do.



Inspiration

Feeling the power of the possible.



Integrity

Being courageously true to our purpose.



Responsibility

Unwavering commitment to seeing things through.

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Policy Overview

REAch2 Academy Trust is committed to operating with the highest ethical standards and acting with integrity in all activities.

This policy sets out our responsibilities regarding the prevention of fraud, bribery and corruption, and the promotion of an ethical culture. The policy also sets out the procedures that will be followed where fraud or corruption are discovered or suspected.

Legal Framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Bribery Act 2010
- Fraud Act 2006
- Companies Act 2006
- Public Interest Disclosure Act 1998
- Charities Act 2011
- Proceeds of Crime Act 2002
- Terrorism Act 2000
- ESFA 'Academies trust handbook'
- This policy operates in conjunction with the following policies:
- Whistleblowing Policy
- Finance Policy and Finance Procedures
- Financial Scheme of Delegation
- Gifts, Hospitality and Anti-bribery Policy
- Conflict of Interest Policy
- Staff Expenses Policy
- Non-staff Expenses Policy

Legal Framework Definitions

Fraud is a criminal offence, which is defined in the Fraud Act 2006 as:

Deceiving through false representation.

Failing to disclose information where there is a legal duty to do so.

Abusing a position of trust.

Corruption is the offering, giving, soliciting or accepting of any inducement or reward which may influence the actions taken by the body, its members or officers.

Theft is dishonestly appropriating property belonging to another with the intention of permanently depriving the other of it.

Bribery is defined by the Bribery Act 2010 as 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.

In this policy, 'fraud' will be used to refer to all the definitions outlined above.

Examples of what could constitute fraud include, but are not limited to, the following:

- Theft of cash
- Substitution of personal cheques for cash
- Travelling and subsistence claims for non-existent journeys or events, or inflating claims
- Manipulating documentation to increase salaries
- Payment of invoices for goods received by an individual rather than the academy
- Unauthorised borrowing of equipment
- Failure to declare a conflict of interest
- Concealing a generous gift or reward
- Creation of false documentation

Roles and Responsibilities

Overall responsibility for dealing with fraud lies with the Trust Accounting Officer.

Responsibilities of the Accounting Officer include:

- Overseeing the development and implementation of a system of internal controls that aim to minimise the risk of fraud.
- Overseeing the development and implementation of effective financial regulations, policies and procedures.
- Ensuring resources are being managed in an ethical, efficient and economical manner.
- Ensuring bank accounts, financial systems and financial records are operated by more than one person.
- Ensuring that rigorous investigations of potential fraud are carried out promptly.
- Ensuring the appropriate legal and/or disciplinary action is taken where fraud is proven.
- Ensuring that appropriate action is taken to recover assets and minimise loss.
- Producing the academy's annual accounts and a statement on regularity, propriety and compliance.
- The external auditor will be responsible for certifying whether the academy's annual accounts present a true and fair view of the its financial performance and position.
- The Chief Finance Officer will be responsible for:
 - Assessing the areas of academy's that are most vulnerable to fraud
 - Identifying new trends in fraud attempts
 - Communicating and facilitating training in fraud prevention

The Senior Financial Accountant will be responsible for:

- Recording all instances of fraud, including outcomes
- Assisting with investigations where appropriate
- Reporting on fraud activity within the Trust

The Headteacher will be responsible for:

- Ensuring staff attend appropriate anti-fraud training
- Receiving reports of fraud within their school, and passing it to the Senior Financial Accountant. If the fraud involves the Headteacher, this should instead be passed to the appropriate Deputy Director of Education.
- Conducting an investigation where a report is made
- Ensuring all reasonable steps are taken to recover monies lost as a result of fraud

The Trust Audit & Risk Committee will be responsible for reviewing the academy's internal controls.

- All employees (including volunteers and temporary staff) and third parties that work with the academy will be responsible for:
- Demonstrating the highest standards of honesty, probity, openness and integrity in the discharge of their duties.
- Complying with the provisions outlined in this policy.
- Being vigilant to the risks and indicators of fraud.
- Promoting an ethical, anti-fraud culture.
- Reporting their concerns in relation to fraud to the Headteacher or appropriate Deputy Director of Education
- Reporting any breach of this policy to the Headteacher or appropriate Deputy Director of Education

Policy In Detail

Indicators for Potential Fraud

Some actions and behaviours may give cause for concern, arouse suspicion and possibly indicate fraudulent activity. These are outlined in Appendix 1.

The list provided in Appendix 1 is not exhaustive; fraud can take many different forms.

All employees will be vigilant to the indicators of fraud.

The presence of any of these indicators may not be a cause for concern; however, they will always be investigated appropriately in accordance with section 10 of this policy.

Creating an Ethical Culture

An ethical, anti-fraud culture will underpin all the work done by the school to counter fraud.

All employees and third parties that work with the academy will be expected to act with high levels of integrity and to adhere with the rules outlined in this policy.

Fraud awareness training will be held for all employees on a regular basis. This may be in the form of third-party webinars, direct training at workshops, or updated training and guidance information.

Training will also be provided to employees with responsibility for the academy's internal controls or financial procedures during Trust induction and when a procedure changes.

Employees will be encouraged to report any concerns to the Headteacher in the first instance, or to the appropriate Deputy Director of Education if the concern includes the Headteacher.

Victimisation or harassment of anyone who has made a report will not be tolerated.

Preventing Fraud

Robust internal controls will be put in place to manage the risk of fraud – these will cover areas including the following:

- Process of authorising transactions
- Access restrictions and transaction controls
- Account reconciliations
- Physical security of assets
- Segregation of responsibilities
- Pre-employment checks

All employees that are involved in the implementation of these controls will be provided with relevant training.

Internal controls will be reviewed on an annual basis by the Head of Finance, to ensure they remain effective and are being consistently applied.

Following a report of a fraud, the finance policy and procedures will be reviewed to ensure it considers all relevant risks and that the internal controls remain effective.

The Chief Finance Officer will assess the areas of the trust that are most vulnerable to fraud. Fraud risks will be identified for all areas and processes of the trust and will be assessed in terms of impact and likelihood. Both monetary and non-monetary impacts will be considered, such as the impact on the trust's reputation.

Record Keeping

Financial records will be kept, along with evidence for the business reasons for making payments to third parties.

Any activities covered by the Gifts and Hospitality Policy must be reported and records kept in line with that policy.

Employees' expenses claims will be submitted in accordance with the Staff Expenses Policy.

All invoices, accounts and related documents will be prepared and maintained with the highest accuracy and completeness.

No accounts will be kept "off-book".

Any reports of fraud, and subsequent investigations, will be recorded.

Reporting Concerns and Making Allegations

Any allegations or concerns of suspected fraud will be reported to the Headteacher. Any allegations or concerns within the Central team must be reported to the Chief Finance Officer.

Allegations involving the Headteacher will be reported to the Deputy Director of Education. Allegations involving the Chief Finance Officer will be reported to the Chief Executive Officer.

Allegations involving Governors or Trustees will be made to the Chief Executive Officer.

Third parties will report any concerns to the Headteacher or the Deputy Director of Education, depending on what the allegation involves.

Any person with a concern or allegation will not investigate the matter themselves.

Procedures outlined in the Whistleblowing Policy can also be followed to report concerns.

Employees, volunteers and third parties will be made aware that reports can also be made directly to the ESFA using an online [enquiry form](#).

Investigating Reports

Reports will be initially investigated by the Headteacher (school) or the Head of Finance (Central), who will ascertain the facts of the report, seeking Finance, HR and legal advice as necessary.

All concerns and reports will be taken seriously and investigated in line with the process outlined above.

Reporters will be asked to provide any evidence they have to support their allegations.

Any person who makes a report will be reassured that they will not suffer recrimination as a result of raising any reasonably held suspicion.

Reports will be investigated objectively; the facts will be considered as they appear, based on the information to hand.

Individuals about which a report is made will not be accused or approached directly prior to an investigation.

In undertaking an investigation, the following will be considered:

- Conduct an investigation to gather factual information and reach an initial view as to whether further action is required.
- Collect relevant evidence, interview all relevant people and analyse any related documentation.
- Decide if the evidence suggests that the allegation or concern is proven.
- Recommend any changes to the internal controls in light of the findings.
- Determine how any losses could be mitigated and take steps to prevent further losses occurring

If further investigations are required, determine which outside agencies should be involved, e.g. auditors or the police.

The Headteacher will notify findings to the Chief Finance Officer following the completion of an investigation.

The Headteacher is responsible for keeping the Chair of the Local Governing Body up to date on the investigation.

The Chief Finance Officer will notify the academy's external auditor of any cases it is investigating, and of the outcome of these cases, at an appropriate stage.

Reporting to the ESFA

Per the Academies trust handbook, the board of trustees must notify ESFA, as soon as possible, of all instances of fraud, theft and/or irregularity exceeding £5,000 individually, or £5,000 cumulatively in any financial year. Unusual or systematic fraud, regardless of value, must also be reported. The following information is required:

- Full details of the event(s) with dates
- The financial value of the loss
- Measures taken to prevent recurrence
- Whether it was referred to the police (and if not why)
- Whether insurance or the RPA have offset any loss.

Following a report, the ESFA may conduct or commission its own investigation into actual or potential fraud, theft or irregularity in the academy, either as a result of a notification from the academy or from other information the ESFA has received. Other authorities, including the police, may be involved in the investigation.

ESFA will publish reports about its investigations and about financial management and governance reviews at academy trusts.

Following an Investigation

The school and Trust will seek to apply appropriate criminal, civil and disciplinary sanctions to all cases of proven fraud and corruption.

Where fraud involving an employee is proven, this constitutes as gross misconduct and cases will be dealt with accordingly in line with the Disciplinary Policy.

Disciplinary action may be taken against employees that make malicious reports of fraud.

The Trust may terminate the contracts of any third party or other associated person acting on behalf of the academy where they are found to have breached this policy.

Where appropriate, cases will be referred to the police in order for them to consider taking criminal action.

Following any incident of fraud, a 'lessons learned' exercise will be conducted. All individuals involved in the investigation of the case will be involved in the activity, which will aim to identify areas of internal controls or other procedures that should be improved to prevent further cases occurring.

Cybercrime and Cybersecurity

The school and Trust will be vigilant to cybercrime and clear cybersecurity measures will be implemented.

The following measures will be implemented specifically relating to addressing the risk of fraud:

- Firewalls, anti-virus software and strong passwords will be used
- Data will be routinely and securely backed up
- A restricted number of devices will be used to access financial or other sensitive data
- Staff should ensure that they:
 - Check the sender of an email is genuine before, for example, sending payment, data or passwords.
 - Make direct contact with the sender where an email requests a payment – this will be done in person where possible, but at a minimum staff must use another method other than the direct reply function, such as a phone call.
- Understand the risks of using public WiFi.
- Understand the risks of not following payment checks and measures.

Any suspected incidents of fraud relating to cybersecurity will be reported and investigated as outlined in section 8 and section 9 of this policy.

The trust will follow the National Crime Agency's (NCA) recommendation to not pay cyber ransom demands. Any decision to pay a cyber ransom demand will only be made if permission has been obtained from the ESFA and Trustees.

Confidentiality

The academy understands that the decision to report a concern can be a difficult one to make.

Victimisation or harassment of anyone who has made a report will not be tolerated.

Where possible, the identity of the person who made the report will be kept confidential; their identity will only be shared on a need-to-know basis.

The identity of the individual(s) about whom an allegation is made will be also be kept confidential, and only shared on a need-to-know basis. Where an allegation is proven to be unfounded or malicious, the individual about whom the allegation was made will be provided with appropriate support.

Annual Accounts

The Accounting Officer will submit the academy's annual accounts return to the ESFA each year. These accounts will include the Accounting Officer's statement on regularity, propriety and compliance.

The Accounting Officer will include any identified cases of fraud in the statement.

The annual audited accounts will be:

- Submitted to the ESFA by 31 December each year.
- Published on the academy's website by 31 January.
- Filed with Companies House in accordance with company law requirements, usually by 31 May.
- Provided to anyone who requests a copy.
- The external auditor will certify whether the annual accounts present a true and fair view of the academy's financial performance and position.

Policy Review

The Anti-Fraud, Bribery and Corruption Policy will be reviewed **3 years** or sooner, taking into account any legislative changes.

Any changes made to this policy will be communicated to all relevant stakeholders.

Appendices

Appendix 1

[This list is not exhaustive and is a guide only. Due to the nature of fraud, indicators may not be exclusive to just one area.]

Personal motives for fraud

- Personnel believe they receive inadequate compensation and/or rewards, e.g. recognition, job security, holidays or promotions
- Expensive life style, e.g. cars and holidays
- Personal problems, e.g. gambling, alcohol, drugs or debt
- Unusually high degree of competition or peer pressure
- Related party transactions (business activities with personal friends, relatives or their companies)
- Conflicts of interest
- Disgruntled employee, e.g. being recently demoted or reprimanded
- Recent failure associated with specific individual
- Personal animosity or professional jealousy

Organisational motives for fraud

- Organisation experiencing financial difficulty
- Commercial arm experiencing financial difficulty
- Tight or unusually tight time deadlines to achieve level of outputs
- Organisational governance lacks clarity, direction or substance
- Organisation closely identified with, or dominated by, one individual
- Organisation under pressure to show results, e.g. budgetary matters or exam results
- Organisation recently suffered disappointment or consequences of bad decisions
- Organisation wants to expand its scope or obtain additional funding
- Funding award or contract for services is up for renewal or continuation
- Organisation due for a site visit by auditors, Ofsted or others
- Organisation has a for-profit component
- Organisation recently affected by new and/or changing conditions, e.g. regulatory, economic or environmental
- Organisation faces pressure to use or lose funds to sustain future funding levels
- Record of previous failure(s) by one or more organisational areas, associated business or key personnel
- Sudden change in organisation practice or pattern of behaviour

Weakness in internal controls

- There is a general lack of transparency about how the organisation works, and its procedures and controls
- Management demonstrates a lack of attention to ethical values – including a lack of communication regarding the importance of integrity and ethics, a lack of concern about the

presence of temptations and inducements to commit fraud, a lack of concern regarding instances of fraud, and no clear fraud response plan or investigation policy

- Management fails to specify and/or require appropriate levels of qualifications, experience or competence for employees
- Management displays a penchant for taking risks
- Lack of an appropriate organisational and governance structure with defined lines of authority and reporting responsibilities
- Organisation lacks policies and communication relating to individual accountability and best practice, e.g. related to procurement, expenses, use of alcohol and declarations of interest
- Lack of personnel policies and recruitment practices
- Organisation lacks personnel performance appraisal measures or practices
- Management displays a lack of commitment towards the identification and management of risks relevant to the preparation of financial statements
- There is inadequate comparison of budgets with actual performance and costs, forecasts and prior performance – there is also no regular reconciliation of control records and a lack of proper reporting to the governing board
- Management of information systems is inadequate, e.g. no policy on ICT security, computer use, verification of data accuracy, or completeness or authorisation of transactions
- There is insufficient physical security over facilities, assets, records, computers, data files and cash
- Failure to compare existing assets with related records at reasonable intervals
- There is inadequate or inappropriate segregation of duties regarding initiation, authorisation and recording of transactions, maintaining custody of assets and alike
- Accounting systems are inadequate, i.e. they have an ineffective method for identifying and recording transactions, no tracking of time periods during which transactions occur, insufficient description of transactions and to which account they should be allocated to, no easy way to know the status of funds on a timely basis, no adequate procedure to prevent duplicate payments or missing payment dates
- Purchasing systems and/or procedures are inadequate, e.g. poor or incomplete documentation to support procedure, purchase, payment or receipt of goods or services
- Subcontractor records and/or systems reflect inadequate internal controls
- There is a lack of internal, ongoing monitoring of controls which are in place and/or failure to take any necessary corrective actions
- Management is unaware of or displays a lack of concern regarding applicable laws, e.g. Companies Act, Charities Act
- Specific problems and/or reportable conditions identified by prior audits or other means of oversight have not been corrected
- No mechanism to exist to inform management, directors, trustees or governors of possible fraud
- General lack of management oversight

Transactional indicators

- Related party transactions with inadequate, inaccurate, or incomplete documentation or internal controls, e.g. business activities with friends
- Not-for-profit entity has for-profit counterpart with linked infrastructure, e.g. shared board of trustees, governors or other shared functions and personnel

- Specific transactions that typically receive minimal oversight
- Previous audits with findings of questioned costs, evidence of non-compliance with applicable laws or regulations, weak internal controls, a qualified audit opinion, or an inadequate management response to any of these issues
- Transactions and/or accounts which are difficult to audit and/or subject to management judgement and estimates
- Multiple sources of funding with inadequate, incomplete or poor tracking, failure to segregate funds, or existence of pooled funds
- Unusual, complex or new transactions, particularly if they occur at year end or end of reporting period
- Transactions and accounts operating under time constraints
- Cost sharing, matching or leveraging arrangements where industry money or other donation has been put into a foundation without adequate controls to determine if money or equipment has been spent/used and whether it has gone to allowable costs and at appropriate and accurate valuations
- Outside entity provided limited access to documentation
- Travel accounts with inadequate, inaccurate or incomplete documentation or poor internal controls, variances between budgeted amounts and actual costs, claims in excess of actual expenses, reimbursement for personal expenses, claims for non-existent travel, or collecting duplicate payments
- Credit card accounts with inadequate, inaccurate or incomplete documentation or internal controls such as appropriate authorisation and review
- Accounts in which activities, transactions or events involve handling of cash or wire transfers
- Presence of high cash deposits maintained with banks
- Assets which are of a nature easily converted to cash (e.g. small size, high value, high marketability or lack of ownership identification) or easily diverted to personal use (e.g. cars or houses)
- Accounts with large or frequent shifting of budgeted costs from one cost centre to another without adequate justification
- Payroll (including fringe benefits) system has inadequate controls to prevent an individual being paid twice or paid for non-delivery or non-existence
- Payroll (including fringe benefits) system is outsourced but there is poor oversight of starters, leavers and payments
- Consultant and subcontract agreements which are vague regarding the work, time period covered, rate of pay or product expected
- There is a lack of proof that a product or service was actually delivered by a consultant or subcontractor
- Sudden and/or rapid growth of newly contracted or existing education providers, e.g. significant increase in pupil numbers for newly contracted providers

Methods used to commit and/or conceal fraud

Employee indicators such as:

- Eagerness to work unusual hours
- Access to or use of computers at unusual hours
- Reluctance to take leave or seek support

- Insistence on doing their job alone
- Refusal of promotion or reluctance to change their job

Auditor/employee issues such as:

- Refusal or reluctance to provide information or hand over documents
- Unreasonable explanations
- Annoyance or aggressive responses to questions or requests, in an attempt to deter auditors
- Trying to control the audit process
- Employee blames a mistake on a lack of experience with financial requirements or regulations governing funding
- Promises of cooperation followed by subsequent excuses to limit or truncate cooperation
- Subtle resistance
- Answering a question that was not asked
- Offering more information than asked
- Providing a lot of information in some areas and little to none in others
- Explaining a problem by saying "we've always done it that way", "someone from the government told us to do it that way" or "Mr X told us to do it that way"
- A tendency to avoid personal responsibility, e.g. overuse of "we" and "our" rather than "I"
- Blaming someone else
- Too much forgetfulness
- Trying to rush the audit process
- Uncharacteristic willingness to settle questioned costs in an attempt to deter further investigation or analysis

General indicators such as:

- A general lack of transparency about how the organisation works and its procedures and controls
- Fabricated explanations to support inability or unwillingness to evidence transactions or assets, such as stated loss of electronic data or theft of business records

Record keeping, banking and other

- Documents that are missing, copied, written in pencil, altered, or that contain false signatures, the incorrect signature or no authorisation where it would be expected
- Deviation from standard procedures, e.g. all files but one handled in a particular way
- Excessive and/or poorly evidenced journal entries, unable to provide explanation for journal entries
- Transfer to or via any type of holding or suspension account
- Inter-fund company loans to other linked organisations
- Records maintained are inadequate, not updated or not reconciled
- Use of several different banks or frequent bank changes
- Use of several different bank accounts
- Failure to disclose unusual accounting practices or transactions
- Unusual accounting practices or transactions, including:
 - Uncharacteristic willingness to settle questioned costs
 - Non-serial-numbered transactions or out-of-sequence invoices or other documents

- Creation of fictitious accounts, transactions, employees or charges
- Writing large cheques to cash or repeatedly to a particular individual
- Excessive or large cash transactions
- Payroll cheques with unusual or questionable endorsements
- Payees have similar names or addresses
- Non-payroll cheques written to an employee
- Defining delivery needs in ways that can only be met by one source or individual
- Continued reliance on person or entity despite poor performance
- Treating non-business and/or personal goods or services as business transactions in financial records
- Misuse of directors loan account facility, e.g. deliberate miscoding of transactions in directors loan account to gain personal advantage
- Materials, goods and or services fictitiously erroneously reported as purchased, and evidence has been fabricated to support the claim. This could potentially be evidenced by:
 - Repeated purchases of the same items
 - Identical items purchased in different quantities within a short time period
 - Invoices and statements used to evidence purchase facilitating duplicate transactions or payments
 - Anomalies in the format of purchase invoices
 - Goods or equipment are not used as promised, or they do not work or exist
- Legitimate business assets put to non-business or private use