

# **Plymouth CAST Anti-Corruption Policy**

**Date adopted by Board of Governors:** Feb 2015 review date Feb 2018

Whether small or large Plymouth CAST recognises that:

- schools are complex organisations and
- an unequivocal commitment to discharging, effectively, our responsibility to safeguard public and private funds is a pre-requisite for demonstrating the highest standards of integrity.

To this end we are intent on creating, embedding, developing and maintaining an anti-fraud and anti-corruption culture across all aspects of all CAST school activities.

This culture will support:

- an ethos for:
  - Deterring corruption, fraud and bribery
  - Preventing corruption, fraud and bribery that cannot be deterred
  - Detecting corruption, fraud and bribery that cannot be prevented
- a framework for:
  - Investigating and facilitating recovery of losses
  - Invoking staff disciplinary proceedings
  - Applying sanctions against people who commit fraud or bribery offences including referral to the police
  - Seeking redress for fraud, overpayment and losses.
  - Monitoring, publishing and updating our policy and procedures.
  - Evaluating the impact of policy and procedures on performance.

NB: The showing of appreciation to staff through small gifts from parents and pupils is not affected by this policy since such gifts are not, in any way, a bribe.

## **PROCEDURE**

- The Chief Executive will identify an Accounting Officer in each academy to take day-to-day responsibility for the oversight of fraud.
- They will carry out a risk assessment covering bribery/corruption risks across all school operating procedures.
- They will implement and strictly enforce the school's anti-corruption policy.
- At least annually they will provide advice, support and/or training on what is acceptable and what is not acceptable in terms of gifts, hospitality and acceptance of donations.
- They will maintain a register of gifts and donations received by the school/members of staff above an annually agreed threshold.
- They will provide advice to appropriate school staff before contracting with or providing benefits to donors.
- They will ensure no gifts are provided for public officials.
- They will carry out due diligence on potential business partners before school enters into any business relationship or project with them.
- They will advise on financial/business links with parents.

- They will actively support leadership and governance in communicating zero tolerance of bribery and/or corruption.
- They will identify the training needs of different categories of school staff and provide regular tailored CPD to meet those training needs.
- They will update all associated school policies and practices to include, where relevant, references to procedures for investigating any allegations of bribery/corruption and, in the case of the school whistle-blowing policy, to include directions for reporting bribery/corruption.
- They will review how we work to ensure clarity of roles and responsibilities in relation to fraud.
- They will encourage and enable all staff to raise serious concerns.
- They will report regularly to the Chief Executive on the efficacy of school arrangements and at least annually to the CAST Board on any instances of Fraud.

## **Definitions**

For clarity and transparency we use the following definitions:

### **Theft**

The 1968 Theft Act states that: A person shall be guilty of theft if s/he dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it.

### **Fraud**

Fraud is: "deceit, trickery, sharp practice, or breach of confidence, perpetrated for profit or to gain some unfair or dishonest advantage". In the broadest sense, a fraud is an intentional deception made for personal gain or to damage another individual. Fraud is both a crime, and also a civil law violation. Defrauding people or entities of money or valuables is a common purpose of fraud, but there have also been fraudulent "discoveries", e.g. in science, to gain prestige rather than immediate monetary gain.

A hoax also involves deception, but without the intention of gain or of damaging or depriving the victim.

**In essence fraud is:** false representation; failure to disclose information when there is a legal duty to do so; abuse of position.

A contextual example of fraud is the intentional distortion of financial statements or other records by persons internal or external to the school which is carried out to conceal the misappropriation of assets or otherwise for gain.

Specific examples of fraud include:

- Falsifying or altering accounting records or other documents
- Suppressing or omitting the effects of transactions from records or documents
- Adding records of transactions which have no substance
- Wilful misrepresentation of transactions or other school affairs.

### **Corruption**

Corruption is the offering, giving, soliciting or acceptance of an inducement or reward which may influence actions being taken.

The areas of school activity which are most susceptible to corruption include:

- Tenders
- Contracts
- Disposal of assets
- Licenses and planning

## **Bribery**

The Bribery Act 2010 defines bribery as giving someone a financial or other advantage to encourage that person to perform their function or activities improperly or to reward that person for already having done so.

## **School Practice**

Everyone employed by Plymouth CAST is required to adhere to the Anti-Corruption Policy. Failure to comply with any aspect of the Code will be a breach of conduct and possibly a criminal offence and will be investigated and addressed in line with school disciplinary procedures.

To ensure all our practices are beyond reproach we require all staff members to support and cooperate with the Lead Professional responsible for our Anti- Corruption Policy (ACP).

We expect and encourage all staff members to raise any concerns they may have relating to fraud and corruption. Care, however, must always be taken to ensure such concerns are raised in good faith. In the first instance concerns can be raised with the individual's Line Manager, or the Lead Professional ACP, or directly with School Leadership. The attention of all staff is drawn to our Whistle Blowing Policy.

All staff members are required to attend designated training, in line with our ACP, and to sign to confirm they have read relevant information produced, from time-to-time, as guidance documents.

All staff members are required to conform to guidance which is issued by school including what is acceptable and what is not acceptable in terms of gifts, hospitality and acceptance of donations. All staff members are required to be aware of the limit above which gifts and donations received by the school/members of staff must be declared and recorded.

All staff dealing with finance must undertake training to ensure the highest standards of accounting are maintained.

All staff involved in recruitment and appointment must adhere to the school's rigorous safer recruitment procedures.

## **School Community**

This policy does not attempt to cover every aspect of theft, fraud corruption and bribery. It is intended to promote a framework whereby all members of the school community may work constructively together for the good of the school and all who work and learn here.

This policy will be reviewed at least annually and contributions from all categories of staff will be sought and welcomed.

The most important aspect of our policy and practice is to demonstrate the highest standards of integrity in all we do.

## **References**

- <http://www.public-standards.org.uk>
- <http://www.justice.gov.uk>