



GAT0016

ANTI FRAUD POLICY

POLICIES AND PROCEDURES PROFORMA

Subject and Version of Document:	Anti Fraud Policy
Author:	Finance Officer
Persons/Committees etc consulted whilst document in draft:	Board of Directors
Date agreed:	11 July 2017
Date of next review/update and by whom:	Finance Officer June 2018
By whom agreed:	Board of Directors
Copy obtainable from and/or distribution:	PA to Head Teacher of The Arnewood School
Responsibility for dissemination to new staff:	Line Manager
Principal Target Audience:	All staff

Amendments Summary:

Amend. No.	Issued	Page	Subject
1	Nov 13	1, 2 & 3	Insert "Anti" in titles
2	June 2017	1, 2 & 3	Change Arnewood to Gryphon Trust

THE GRYPHON TRUST ANTI FRAUD POLICY

(To be read in conjunction with the Trust's personnel procedures and 'Whistleblowing' policy)

1.0 Purpose

- To take all allegations of fraud seriously
- To investigate all allegations of fraud appropriately
- To educate staff on fraud awareness and the relevant procedures

1.1 It is expected that staff act honestly and with integrity at all times. The prevention of fraud and the protection of the school is the responsibility of every member of staff

2.0 Definition

2.1 For the purposes of this policy the term 'fraud' includes a number of different types of illegal activity, including the following:

- Theft of money or goods
- Forgery – altering documents or signatures
- Embezzlement – taking resources
- Misuse or misappropriation of funds
- False accounting – e.g. giving incorrect information, untrue details or fake invoices
- Bribery or corruption – offering or accepting inducements
- Being under undue influence – failing to disclose an interest
- Extortion – obtaining favours by the use of threats
- Conspiracy or collusion – entering into agreements with others to carry out illegal activities
- Money laundering

2.2 All have the common element of taking personal gain when it is not moral or legal to do so

3.0 Action

3.1 When fraud is identified, action will be taken to limit the damage, seek reparation for losses incurred, punish the perpetrator/s and revise procedures to prevent any recurrence

3.2 Any suspicion of fraud should be reported to a member of the school's Senior Management Team, or if more appropriate, to, either the Chair of Governors, the Chair of Finance or any other governor who can pass on the information

3.3 The Senior Management Team member or governor will make any initial enquiries considered necessary to validate the report. In every case and as soon as possible after initial enquiries the matter will be passed to the Board of Directors, even if there is no evidence to support the allegation

3.4 The management of any investigation will be undertaken by an audit sub-committee set up and controlled by the Board of Directors to:

- Determine whether further investigation is warranted
- Determine who should carry out the investigation
- Determine which outside agencies (e.g. police, auditors) should be involved
- Assess the risk to the school
- Allocate responsibility for damage limitation action
- Determine the course of action to recover losses
- Determine the course of action to be taken against perpetrators
- Evaluate the events which enabled the fraud to occur
- Ensure preventative action is taken