

# Clewer Green CE Aided First School

## *Inspiring Children*

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*Vision: Every child has been blessed by God with unique potential. Our vision for Clewer Green is to inspire and nurture children in a safe, happy and caring Christian community, where everyone is valued and enjoys learning.*

### **POLICY DOCUMENT ANTI-FRAUD AND ANTI-CORRUPTION**

#### **AIM**

Our aim, in line with our distinctively Christian values, is for every child, to have the support that they need, and, by example and direct teaching, promote a Christian ethos within the school, whilst recognising that not all of its members will be practising Christians.

The prevention/ detection of fraud and corruption and the protection of the public purse are everyone's responsibility. All governors of a school have a duty to act with integrity and only in the public interest, uphold the law and do whatever they can to ensure that schools use their resources efficiently and effectively.

Further details of the Royal Borough of Windsor and Maidenhead anti-fraud and anti-corruption strategy for schools can be viewed in the appendix.

In the first instance of an awareness that all is not as it should be, an approach should be made to the Headteacher and the Chair of Governors via the school office.

Governors shall keep a register of inducements of over £25 (differing from the £10 listed in the model policy) and get a sign-off from the School Business Manager.

#### **OTHER RELATED POLICIES**

The Anti-Fraud and Anti-Corruption policy should be read in conjunction with other relevant school policies:

- Whistleblowing policy

Advice to employees can be found on First Class Education Finance/Finance Documents/Fraud Information/Policies/Anti-Fraud Corruption Guidance Notes for Employees July 10.

Revised March 2019  
Review date March 2020

Date \_\_\_\_\_

\_\_\_\_\_  
Kate Kelliher, Chair of Governors

## **APPENDIX**

The following strategy can be found at: First Class/Education Finance/Finance Documents/Fraud Information/Policies/Section 17 Anti-Fraud and Anti-corruption Strategy issued in 2011

### **ROYAL BOROUGH OF WINDSOR AND MAIDENHEAD**

## **ANTI-FRAUD AND ANTI-CORRUPTION STRATEGY for SCHOOLS**

### **1. INTRODUCTION**

1.1 The Royal Borough of Windsor and Maidenhead (RBWM) (the Council) employs approximately 5,000 members of staff, with a gross expenditure of £298m and gross income of £207m (2010/11), together with assets and annual transactions running to millions of pounds.

1.2 In administering its responsibilities, the Council, including its Schools, aims to protect itself against fraud and corruption, whether it is attempted by someone from within the Council (Governors or employees) or from external sources (parents of pupils, clients, partners or contractors). The Council is committed to an effective Anti Fraud and Anti Corruption Strategy designed to:-

- ENSURE PREVENTION;
- PROMOTE DETECTION;
- IDENTIFY A CLEAR PATHWAY FOR INVESTIGATION & REMEDIAL ACTION;
- PROSECUTE OFFENDERS AND PUBLICISE ACTIONS TAKEN

1.3 The Council's and School's expectation on propriety and accountability is that Governors and staff at all levels will lead by example and the Council and School also expects that individuals and organisations, e.g. parents, suppliers, partners, contractors and service providers with whom it deals, will act towards the Council and School with integrity and without intent or actions to commit fraud or corruption.

1.4 The Strategy makes no distinction between those fraud cases that generate financial benefits and those that do not. Additionally, the Council and School will always have regard to its Diversity and Equality Framework and its obligations as an employer.

1.5 This Strategy document is based on comprehensive and interrelated procedures designed to frustrate any attempted fraudulent or corrupt act. These cover:

- |                                      |                  |
|--------------------------------------|------------------|
| • <b>Culture</b>                     | <b>Section 2</b> |
| • <b>Prevention</b>                  | <b>Section 3</b> |
| • <b>Deterrence</b>                  | <b>Section 4</b> |
| • <b>Detection and Investigation</b> | <b>Section 5</b> |
| • <b>Awareness and Training</b>      | <b>Section 6</b> |
| • <b>Availability</b>                | <b>Section 7</b> |

### **2. CULTURE**

2.1 The prevention / detection of fraud and corruption and the protection of the public purse are everyone's responsibility. Through the guiding principles of the Community Strategy, RBWM

- is determined that the culture and tone of the organisation represents openness and honesty and opposition to fraud and corruption.
- 2.2 Governors and employees within Schools play an important role in creating and maintaining this culture and are positively encouraged to raise any concerns they have regarding fraud and corruption, immaterial of seniority, rank or status.
- 2.3 Members of the public (e.g. parents), partners and contractors working on behalf of the Council are also encouraged to report any concerns that they may have through any of the routes shown in paragraph 2.5 below or through the stages of the Council Complaints Procedure.
- 2.4 Concerns may include:
- A criminal offence;
  - A failure to comply with a statutory or legal obligation;
  - Improper unauthorised use of public or other funds;
  - Bribery;
  - Abuse of the internet;
  - A miscarriage of justice;
  - Maladministration, misconduct or malpractice;
  - Endangering of an individual's health and safety;
  - Damage to the environment;
  - Deliberate concealment of any of the above.
- 2.5 The Headteacher or Chair of Governors is responsible for contacting the Head of Audit & Investigation at the earliest opportunity with any allegations received and the Council will ensure that all allegations received, including by anonymous letter or phone call, will be taken seriously and investigated in an appropriate manner. The various routes through which an individual may raise a concern include:
- Headteacher
  - Chair of Governors
  - Governor Services
  - Director of Children's Services
  - directly with the Head of Audit and Investigation
  - Head of Finance (Section 151 Officer)
  - Head of Human Resources & Organisational Development
  - Monitoring Officer (Head of Legal Services)
  - Chief Executive
  - Council's External Auditors (KPMG)
  - elected Members
  - the Local Government Ombudsman
- 2.6 Senior management are expected to deal swiftly and firmly with those who defraud the Council or Schools or who are corrupt, adhering to the correct procedures at all times. They will also ensure that improvements in systems are implemented where there is a breakdown in systems or procedures.

### **3. PREVENTION**

- 3.1 The Council firmly believes that to beat fraud and corruption, prevention is the key element and it is essential to instil an anti-fraud and anti-corruption culture and to minimise the exposure to opportunities for fraud.

#### **Role of Governors**

- 3.2 All Governors of a School have a duty to act with integrity and only in the public interest, uphold the law and do whatever they can to ensure that Schools use their resources efficiently and effectively.
- 3.3 Governors are bound by their Code of Conduct adapted from the National Governor Association's Code of Practice and A Guide to the Law for School Governors and make a declaration in accordance with the School Governors (Constitution) (England) Regulations 2003. Governors are required to declare and register all information that may cause a potential conflict of interest between their role as a Governor and their personal and professional lives.

### **Role of Employees**

- 3.4 A key measure in the prevention of fraud and corruption is to take effective steps at the recruitment stage, to establish, as far as possible, the honesty and integrity of prospective employees. The Council's formal recruitment procedure contains appropriate safeguards on matters such as written references, the independent confirmation of professional qualifications and Disclosure & Barring Service (DBS) checks. Temporary and contract employees should be treated in the same manner as permanent employees.
- 3.5 Employees are expected to comply with the Council's Constitution and various Policies, including the local School's Finance Policy and procedures, and the Headteacher and Governors are responsible for the communication and implementation of these policies. Headteachers and Governors are expected to create an environment in which their staff feel able to approach them with any concerns they may have about suspected irregularities.
- 3.6 Where employees have responsibility for the safekeeping of assets of the Authority or School, the Care of Council Owned Equipment Policy applies and where employees are responsible for cash handling or financial systems, officers are responsible for complying with RBWM Finance Rules and the local School Finance Policy and procedures.
- 3.7 The Council's procedures in relation to the accepting or offering of Gifts and Hospitality are detailed in the Gifts and Hospitality Procedures, available on First Class. Any item either over £10, or deemed to be given to influence decision making, should be declared to the Headteacher, Chair of Governors or RBWM's Head of Finance, as appropriate.

### **Conflicts of Interest**

- 3.8 Governors and employees must ensure that they avoid situations where there is potential for a conflict of interest. This helps to ensure that decisions are made based upon impartial advice, e.g. the selection of suppliers, awarding of contracts, and will avoid accusations of preferential treatment and improper disclosure of confidential information.
- 3.9 It is the responsibility of all officers and Governors to declare when they are faced with such a scenario and they should withdraw from the process/ meeting/decision making. Officers and Governors should disclose annually, or when personal circumstances change, any third party relations or potential conflicts of interest. Consideration also has to be given during meetings and discussions.

### **Role of Internal Audit**

- 3.10 The Audit and Investigation Unit (which includes Internal Audit, the Benefit Fraud Service, Risk and Insurance Services) plays a vital preventative role in helping to ensure that efficient and effective systems and procedures are in place across RBWM to help prevent and detect fraud and corruption. Dependent on the nature of a case, Internal Audit will normally work closely with the School and Authority management and other agencies to investigate all cases of suspected irregularity, in accordance with relevant legislation, and to recommend corrective action to prevent further losses.

## **Role of External Audit**

- 3.11 External Audit is an essential independent safeguard in the stewardship of public money. This role is delivered through the carrying out of reviews that are designed to test (amongst other things) the adequacy of the Council's financial systems and arrangements, for preventing and detecting fraud and corruption. It is not External Audit's function to prevent fraud but the integrity of public funds is their concern at all times.

## **Co-operation with Others**

- 3.12 Arrangements are in place and continue to develop which encourage the exchange of information with other agencies, on both national and local fraud and corruption activity, in regard to Schools and local authorities. Some of these agencies include:
- Police / Fraud Teams
  - National Anti Fraud Network (NAFN)
  - Department of Work and Pensions (DWP)
  - Department for Children, Schools and Families (DCSF)
  - Benefits Agency
  - Housing Benefit Data Matching Service (HBMS)
  - Students Loan Company
  - Trading Standards
  - County, Unitary and District Groups
  - Audit Commission
  - HM Revenues & Customs

## **4. DETERRENCE**

### **Disciplinary Action**

- 4.1 Theft, fraud and corruption are serious offences against Schools and the Council and employees and Governors will face disciplinary action. This will be taken in addition to, or instead of, criminal proceedings, depending on the circumstances of each individual case, but will be in a consistent manner. For employees this will be after consultation with the Headteacher, Chair of Governors, Director of Children's Services, Monitoring Officer, Head of Finance, Head of Human Resources & Organisational Development and Head of Audit and Investigation, as appropriate.
- 4.2 Governors and the Director of Children's Services also face action under this Strategy. As appropriate, the Director of Children's Services or the Chief Executive will lead any investigation process. An appropriate investigating officer will be appointed in liaison with the Monitoring Officer, Head of Finance, and the Head of Audit and Investigation, as appropriate.

### **Prosecution**

- 4.3 The decision to refer a matter to the Police will be made by the Head of Finance in consultation with the Director of Children's Services, the Monitoring Officer, Head of Audit and Investigation and Head of Human Resources & Organisational Development, as appropriate. A Crime Protocol is in the process of being developed to speed up the process of logging a crime and to provide the Police with good quality evidence.
- 4.4 The Council has adopted a Corporate Prosecution Policy and a Benefit Fraud Prosecution Policy which are designed to clarify the action to be taken in specific cases and to act as a deterrent. It is recognised that it may not be in the public interest to refer some cases for criminal prosecution.

## **Publicity**

- 4.5 The Council's Press and Public Relations Unit will optimise the publicity opportunities associated with successful anti-fraud and anti-corruption activity within the Council and will try to ensure that the results of any action taken, including prosecutions, are reported in the media.
- 4.6 Where financial loss to the School or Council has occurred, the School or Council will normally seek to recover the loss and advertise this fact, unless special circumstances mean that this is not appropriate.
- 4.7 All anti-fraud and anti-corruption activities, including the update of this Strategy, will be publicised in order to make the employees and the public aware of the Schools and Council's commitment to taking action on fraud and corruption when it occurs.
- 4.8 Annual reports will be made to the RBWM Audit and Performance Review Panel summarising fraud and corruption activities undertaken and their success.

## **5. DETECTION AND INVESTIGATION**

- 5.1 The array of preventative systems within RBWM not only helps to prevent fraud and corruption but they also provide indicators and can help detection of fraudulent activity. It is the responsibility of Headteachers, management and senior officers to maintain adequate internal control systems, however, it is often the alertness of staff and the public that arouses suspicion and enables detection and action to be taken.
- 5.2 In some cases, frauds are discovered by "tip-off" and arrangements are in place to enable such information to be properly dealt with.
- 5.3 Reporting through the proper channels enables an investigation of the allegations to be promptly undertaken and this is essential in facilitating and ensuring:
  - a proper and thorough investigation by an experienced independent team in accordance with all appropriate legislative requirements;
  - the proper implementation of an action plan after the investigation is complete;
  - the optimum protection of the School's and Council's interests;
  - consistency in the treatment of information regarding fraud and corruption.
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## **6. AWARENESS AND TRAINING**

- 6.1 The Council recognises that the continuing success of this Strategy and its general credibility will depend on the awareness of Members and all employees throughout RBWM, their responsiveness and the effectiveness of training.
- 6.2 To facilitate this, provision will be made via Member training, the E-Induction facility on the Intranet and employees' personal development plans, to ensure that they are aware of their responsibilities and duties in this respect.
- 6.3 Disregarding such guidance and training may breach disciplinary codes.

## **7. AVAILABILITY**

- 7.1 Copies of this Strategy and the Raising Concerns at Work (Whistleblowing) Policy are available to all employees and Members via the Intranet, the RBWM website and E-Induction facility.

## **8. CONCLUSION**

- 8.1 RBWM prides itself on setting and maintaining high standards and a culture of openness. This Strategy fully supports the desire to maintain an honest Council, with Members and employees acting with integrity and without intent or actions to commit fraud or corruption.
  
- 8.2 The Council has in place a network of systems and procedures in place to assist in the prevention of fraud and corruption and to effectively deal with it when it arises. These arrangements will be kept under review to ensure that all opportunities to take advantage of developments in techniques for preventing and detecting fraudulent or corrupt activity are maximised.
  
- 8.3 This Strategy will be subject to an annual review, which will include monitoring its effectiveness and compliance.

Catherine Hickman  
Head of Audit and Investigation

Version: 5  
Issue Date: June 2011  
Review Date: June 2012