



# **Martin Primary School**

## Anti-Fraud and Corruption Policy

Reviewed and ratified by the Finance Committee: Summer 2026  
Date of next review: Summer 2027

## Statement of intent

Martin Primary School is committed to upholding the highest ethical standards and acting with integrity in all business activities. This policy details the school's position on the prevention of fraud, bribery and corruption, and the promotion of an anti-fraud culture.

The school is committed to preventing corruption and eliminating fraud by the way we conduct school business, the culture instilled in staff and the recruitment of trustworthy individuals.

To minimise the risk and impact of fraud and corruption, we aim to create a culture which deters fraudulent and corruptive activity, encourages its prevention and promotes its detection and reporting.

The purpose of this policy is to:

- establish the responsibilities of the Governing Body and staff members in observing and upholding our position on fraud, bribery and corruption
- provide information and guidance to school staff on how to recognise and deal with concerns over fraudulent activity
- promote the early detection of fraudulent and corruptive behaviour.

This policy covers all individuals working for the school at all levels (whether permanent, fixed-term or temporary), and includes governors, volunteers, agents and any other persons associated with the school.

### 1. Legal framework

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

- The Bribery Act 2010
- The Fraud Act 2006
- DfE (2023) 'Schools financial value standard (SFVS) and assurance statement'

This policy is implemented in accordance with the following school policies and procedures:

- Whistleblowing Policy
- Financial Management Policy
- Barnet's Capability Policy
- Staff Code of Conduct
- Governing Body Code of Conduct
- Data Protection Policy

### 2. Definitions

**Fraud** is a criminal offence, which is defined by 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 school, its members or officers.

See Appendix 1 for examples of possible fraud and corruption

**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.

### **3. Roles and responsibilities**

The Governing Body is responsible for:

- ensuring that internal controls, procedures and policies are put in place that minimise the risk of fraud and corruption, including theft and bribery
- monitoring school procedures in relation to fraud.
- approving this policy on an annual basis, ensuring that it remains adequate and appropriate for the needs of the school.
- working with the headteacher to establish effective recruitment procedures, ensuring that all candidates are thoroughly vetted prior to commencing their employment.
- promoting an anti-fraud and corruption culture within the school.
- setting the standards for the school and giving their full support to all systems and controls in place to assure probity.
- ensuring that any business and personal interests of all members of the Governing Body are declared.
- reporting any instances of suspected fraud or irregularity to the LA
- ensuring that the school meets its duties under the SFVS to guard against fraud and theft by staff, contractors and suppliers.

The headteacher is responsible for:

- ensuring that all employees are aware of the school's policy on fraudulent and corruptive behaviour and understand the relevant school procedures
- setting high examples of conduct in their day-to-day work, which are beyond reproach
- publicising the school's commitment to fighting fraud and corruption
- working with the Governing Body to establish recruitment procedures, which ensure all candidates are thoroughly vetted prior to commencing their employment
- ensuring and monitoring the school's compliance with internal controls and agreed policies and procedures related to fraud and corruption
- informing the chair of the Governing Body or the LA of any indications of fraudulent activity and alleged financial irregularities
- reporting to the Governing Body on all aspects of fraud risk management

The SBM is responsible for:

- developing, implementing and maintaining adequate systems of internal control to prevent and detect fraud
- ensuring that all relevant staff are adequately trained on internal controls and procedures that need to be complied with

- implementing any changes to the internal controls and procedures that may have been identified as a result of a fraud or irregularity investigation, to prevent further instances of fraud or corruption
- informing the headteacher or the chair of governors, as appropriate, of any indications of fraudulent activity and alleged financial irregularities
- maintaining an up-to-date Gifts and Hospitality Register.

All members of staff are responsible for:

- upholding the anti-fraud and corruption culture within the school
- adhering to the school's policies and procedures in relation to fraud and corruption, including acts of bribery and theft
- ensuring they are familiar with the indicators of potential fraud, in addition to common types of fraud and irregularities that may occur within the school
- reporting any instances of suspected fraud or irregularity, no matter how trivial they may seem, to the headteacher or chair of the Governing Body
- declaring any business and personal interests held, as well as any offers of gifts or hospitality, which are in any way related to the performance of their duties in relation to the school
- ensuring that the school's reputation and assets are protected against fraud.

All governors and staff, including volunteers, temporary staff and third parties, are responsible for:

- demonstrating the highest standards of honesty, probity, openness and integrity in the discharge of their duties. This includes:
  - compliance with the provisions outlined in this policy
  - contributing to a framework within which counter-fraud arrangements will flourish
  - promoting an anti-fraud and corruption culture
  - reporting their concerns in relation to fraud
  - reporting any breach of this policy to the headteacher or chair of governors
  - providing information about any conflicts of interest and direct or indirect pecuniary interests to the headteacher.

#### **4. Creating an ethical culture**

The creation of an ethical, anti-fraud culture underpins all the work done by the school to counter fraud and other irregularities.

All employees are expected to act with high levels of integrity and to adhere to the rules outlined in this policy. All individuals and organisations that work with the school must act with integrity.

Anti-fraud awareness training is held for all employees on an annual basis, to ensure employees understand the risk of fraud faced by the school.

Specific training is also provided to employees with responsibility for the school's internal controls.

There are clear reporting mechanisms in place and all employees are aware of, and follow, these procedures.

#### **5. Preventing fraud and corruption**

Fraud and corruption are minimised through effectively designed and consistently implemented management procedures which deny opportunities for fraud and corruption.

The headteacher and SBM assess the areas of the school that are most vulnerable to fraud on a termly basis.

Fraud risks are identified for all areas and processes of the school and are assessed in terms of impact (including monetary and non-monetary) and the likelihood of occurrence.

Robust internal controls are in place to manage the risk of fraud, these cover the following areas:

- approval and authorisation process of transactions
- access restrictions and transaction controls
- account reconciliations
- physical security of assets
- segregation of responsibilities
- pre-employment checks

Internal controls are reviewed on an annual basis to ensure they remain effective and are being consistently applied.

Financial procedures and systems reflect the need for internal checks and internal controls. All employees that are involved in the implementation of these controls are provided with training.

Robust IT procedures are put in place, including restricting access to certain systems. Other steps taken towards ensuring IT security are outlined in [section 13](#) of this policy.

All employees will follow the Staff Code of Conduct.

Recruitment is conducted in line with the Recruitment Policy and all new employees are required to declare any business or pecuniary interests, and any other conflicts of interest.

Following a case of fraud or irregularity, the risk management strategy is reviewed to ensure it considers all relevant risks and is effective.

## **6. Indicators of fraudulent activity**

Some actions and behaviours may give cause for concern, arouse suspicion and possibly indicate fraudulent activity. A list of actions and behaviours that may give cause for concern, arouse suspicion and indicate possible fraud can be found in Annex A – any actions or behaviours in this list will be brought to the attention of the headteacher and the individual in question will be closely monitored.

All staff are vigilant to the risks of fraud. Clarification is sought from the headteacher if there are any questions over whether a factor is considered an indicator of fraud.

The school recognises that the presence of any of these indicators may not be a cause for concern; however, they will always be investigated appropriately.

It is important to note that any one of these on its own may be perfectly innocent and a function of carrying out normal duties; however, a combination of the factors may give cause for concern.

## **7. Reporting suspected fraud**

Concerns regarding fraudulent activity are reported to the headteacher or, where there are concerns over the headteacher, the chair of the Governing Body.

Concerns can be raised in person, via email or telephone, or by using a Fraud Reporting Form (see Appendix 2).

Under no circumstances will staff investigate the matter themselves.

Any concerns are reported immediately in the knowledge that such concerns are treated in confidence and properly investigated.

If a member of staff wishes to report a fraud concern anonymously or wishes to seek advice about how to deal with an allegation of fraud, they should contact the LA.

Procedures outlined in the Whistleblowing Policy are followed to report concerns where the normal reporting procedure is not appropriate. The Whistleblowing Policy can be found on the school's website or obtained from the school office. Employees who raise concerns in good faith are supported by the school and the school ensures that they are not subjected to any detrimental treatment as a consequence of their report. Any instances of detrimental treatment against an employee for reporting a suspicion are treated as disciplinary offences.

Claims are, in the first instance, investigated by the headteacher to ascertain the basic facts. If the claim concerns the headteacher, the chair of the Governing Body ascertains the basic facts.

Subject to the findings, the matter is reported to the LA.

Suspects are not made aware that they are under investigation until agreed by the LA.

No information concerning suspicions of fraud or corruption are reported to the press, media or any other third party. Such disclosures may damage the investigation and any subsequent actions to be taken.

The LA has full right of access to examine any necessary documents and the contents of school property, including the examination of computers and related equipment, as well as to undertake interviews with staff members.

The investigation process includes:

- gauging the credibility of the allegation
- securing evidence and ensuring it is retained in the original format
- interviewing witnesses
- taking statements
- interviewing potential suspects
- liaising with the headteacher and Governing Body, as well as external agencies where necessary.

The anti-fraud team works closely with the headteacher and Governing Body in fraud related cases involving disciplinary investigation.

Cases of fraud are also reported to Action Fraud via their [website](#) or via their hotline: 0300 123 2040.

Where fraud is proven, this constitutes gross misconduct and cases are dealt with in accordance with the school's disciplinary procedures.

Where appropriate, the school refers cases to the police for them to consider taking criminal action.

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

## **8. Recovery of losses**

Where practicable, the school seeks to recover any losses incurred as a result of fraud or corruption.

The Governing Body is immediately informed of any potential loss and provided with details of the case and any recovery action being undertaken.

If an individual under investigation offers money in settlement of losses to the school, the monies are accepted without prejudice to any other action the school may wish to take. Money will only be accepted in respect of losses to date and the school will reserve the right to seek the recovery of further losses that may come to light in the future.

The school will only claim under insurance arrangements once all other avenues of recovery have been exhausted.

## **9. Gifts and hospitality**

It is not acceptable for employees to:

- give, promise or offer a payment, gift or hospitality with the expectation or hope that an advantage for the school will be received, or to reward an advantage already received
- give, promise or offer a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure
- accept payment from a third party if they know or suspect that it is offered with the expectation of a business advantage in return
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns regarding bribery.

The school does not prohibit normal and appropriate hospitality or gifts (both given and received) if the following requirements are met:

- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in exchange for favours or benefits
- it is given in the school's name, not an individual's name
- it complies with local law

- it is appropriate in the circumstances, e.g. the giving of small gifts at Christmas time
- the type and value of the gift is reasonable given the reason the gift is offered
- it is given openly, not secretly
- gifts should not be offered to, or accepted from, government officials or representatives without the prior approval of the headteacher.

Gifts of a value of £20 or less can be accepted from individual parents and pupils without approval from the headteacher (providing that these gifts do not satisfy the conditions outlined above).

The advice of the school is to, in all circumstances, consider whether the gift or hospitality is reasonable and justified, and to consider the intention behind the gift.

## **10. Charitable donations**

Charitable donations are part of the school's wider purpose. The school supports several carefully selected charities. The school may also support fundraising events involving employees. The school only makes charitable donations that are legal and ethical. No donation must be offered or made in the school's name without the prior approval of the headteacher.

## **11. Reporting suspected bribery**

Employees are encouraged to raise concerns about any suspicion of bribery or corruption at the earliest possible opportunity. Issues that should be reported include:

- any suspected or actual attempts at bribery
- any concerns that an employee may be in receipt of bribes
- any concerns that an employee may be offering or delivering bribes.

All concerns should be reported following the procedure set out in the school's Whistleblowing Policy.

All reports of bribery are investigated thoroughly and in a timely manner by the headteacher in the strictest confidence. Employees are required to assist in any investigation into possible or suspected bribery.

Employees who raise concerns in good faith are supported by the school and the school ensures that they are not subjected to any detrimental treatment as a consequence of their report. Any detrimental treatment against an employee for reporting a suspicion is treated as a disciplinary offence.

The school invokes disciplinary procedures where any employee is found guilty of bribery, and this may result in a finding of gross misconduct and immediate dismissal. The school may terminate the contracts of any associated persons, including consultants or other workers acting for, or on behalf of the school, who are found to have breached this policy.

Where appropriate, the school refers cases to the police for them to consider taking criminal action.

The school seeks to apply appropriate criminal, civil and disciplinary sanctions to all cases of proven bribery.

## **12. Confidentiality**

The school 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 is never tolerated.

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

## **13. Cybercrime and cybersecurity**

The school is vigilant of cybercrime and clear cybersecurity measures are in place, as outlined in the Data Protection Policy

The following measures are in place specifically relating to addressing the risk of fraud, theft and/or irregularity:

- firewalls, anti-virus software and strong passwords are used
- data is routinely backed up
- a restricted number of devices are used to access data.

Staff receive training to ensure 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 is done in person where possible, but at a minimum, staff must use another method other than the direct reply function
- understand the risks of using public Wi-Fi
- understand the risks of not following payment checks and measures.

Any suspected incidents of fraud, theft and/or irregularity relating to cybersecurity are reported and managed as outlined in [section 7](#).

## **14. Record keeping**

The school keeps financial records and has appropriate internal controls to provide evidence for business reasons and for making payments to third parties. Employees must make the headteacher aware of all hospitality or gifts received or offered over the value of £30 and, if received by the headteacher, the Chair of Governors – these are subject to managerial review.

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

No accounts are kept “off-book”.

## **15. Monitoring and review**

This policy is reviewed on an annual basis by the Governing Body, SBM and the headteacher.

## **Appendix 1: Indicators of potential fraud**

### **Personal motives for fraud**

- Personnel believe they receive inadequate compensation and/or rewards, e.g. remuneration, recognition, job security, holidays or promotions
- Expensive lifestyle, e.g. luxury cars and holidays
- Personal problems, e.g. gambling, alcohol, drugs or debt
- Unusually high degree of competition or peer pressure
- Related party transactions
- Conflicts of interest
- Disgruntled employees, 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 the 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 structures with defined lines of authority and reporting responsibilities

- Organisation lacks policies and communication relating to individual accountability and best practice, e.g. relating 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 Body
- 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, recording 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, and 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 2006, Charities Act 2011
- Specific problems and/or reportable conditions identified by prior audits or other means of oversight have not been corrected
- No mechanism exists 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 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 the end of the reporting period
- Transactions and accounts operating under time constraints
- Cost sharing, matching or leveraging arrangements where industry money or another 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 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 to deter auditors
- Trying to control the audit process
- Auditee/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" or "someone from the government 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
- Unreasonable levels of 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 and unable to provide an explanation for journal entries
- Transfer to or via any type of holding or suspension account
- Inter-fund company loads 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 an individual
  - Excessive or large cash transactions
  - Payroll cheques with unusual or questionable endorsements
  - Payees with 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 a director's loan account facility, e.g. deliberate miscoding of transactions in a director's loan account to gain personal advantage
- Materials goods and/or services fictitiously and 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

## Appendix 2: Fraud Reporting Form

If you have any concerns over fraud, corruption or bribery at the school, please contact the Chair of the Governing Body Finance Committee at [black@martinprimary.barnet.sch.uk](mailto:black@martinprimary.barnet.sch.uk). All information is treated in strict confidence.

**If you wish to remain anonymous, please leave the 'Your details' fields blank.**

### Your details

Name:	
Address:	
Contact number:	

### Details of the suspected fraud, corruption or bribery

Name of the person(s) you suspect to be involved in fraud, corruption or bribery:	
Address (if known):	
Department and job title (if known):	

Please use the space below to provide details of your suspicions. Please provide as much detail as possible including dates, times, locations, conversations and the names of any other parties involved. The more information you can provide, the better the chances of the issue being successfully resolved. If necessary, continue overleaf and attach any additional evidence you may have.

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