Anti-fraud Policy

Responsibility for Review: School and college trust leader: finance
Date of Last Review: September 2026

Anti-fraud policy: document provenance

Approver	Audit and risk committee
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Policy owner	School and college trust leader: finance
Policy authors	School and college trust leaders Finance centre of excellence
Version	1.0
Date of next review	September 2028
Summary of changes in this review	• This is a new policy
Related policies and documents	• Whistleblowing policy • Finance policy • Tendering and procurement policy • Gifts and hospitality policy • Financial scheme of delegation • Scheme of delegation • Academy Trust Handbook (ATH) • Disciplinary policy • Professional conduct policy • Risk management policy

Unless there are legislative or regulatory changes in the interim, the policy will be reviewed as per the review cycle. Should no substantive change be required at this point, the policy will move to the next review cycle.

Contents

1.0 Policy statement

1.1 This policy outlines how our trust prevents, identifies, and responds to suspected or actual fraud, corruption, or financial irregularity. Robust fraud prevention arrangements are embedded within our trust's governance framework and a range of other established policies and procedures. These policies collectively provide a strong system of internal control designed to safeguard public funds and ensure financial integrity across all academies within our trust.

1.2 Our trust is committed to maintaining the highest standards of accountability, transparency, and ethical conduct in the management of public funds. The approach to fraud prevention and response aligns with the expectations of the Department of Education and the requirements set out within the Academy Trust Handbook (ATH). Our trust board recognises its responsibility to ensure that appropriate systems and procedures are in place to minimise the risk of fraud and to respond effectively where concerns arise.

1.3 Our trust recognises the requirements of the Economic Crime and Corporate Transparency Act 2023, including the offence of failure to prevent fraud.

2.0 Scope and purpose

2.1 The purpose of this policy is to set out how our trust prevents, identifies and responds to suspected or actual fraud, corruption or financial irregularity.

2.2 This policy also sets out our approach to preventing or minimising the risk of fraud.

2.3 This policy applies to:

- all academies and sites within our trust including all assets
- all staff, students, visitors and other adults using our trust sites, assets or networks

3.0 Definitions

3.1 Fraud is generally defined as an intentional act or omission designed to secure an unfair or unlawful financial gain. Within the context of our trust, fraud may involve the misuse of trust funds, assets, or information for personal benefit or for the benefit of others. Examples may include the theft or misappropriation of trust funds or property, falsification of financial records, deliberate manipulation of financial information, procurement irregularities, misuse of trust credit cards, false expense claims, payroll fraud, bribery, corruption, or abuse of position for personal gain.

3.2 Fraudulent activity may be committed by employees, trustees, contractors, suppliers, or other third parties who interact with our trust. Our trust expects all individuals associated with its operations to act with honesty and integrity and to support the prevention and detection of fraud.

4.0 Principles

4.1 Our trust will respond to all allegations of fraud in accordance with the following principles:

- allegations will be treated seriously and confidentially
- investigations will be objective and proportionate
- individuals will be treated fairly and in accordance with employment law
- evidence will be preserved
- appropriate authorities will be notified where required
- lessons learned will be implemented promptly to strengthen internal controls

5.0 Governance and oversight

5.1 Responsibility for fraud prevention ultimately rests with our trust board, which ensures that appropriate governance arrangements and internal controls are in place across our trust. Oversight is supported through the work of the finance committee and audit and risk committee, which monitor financial management, internal control systems, and risk management processes.

5.2 Our trust also operates an internal scrutiny function that provides independent assurance to the board regarding the effectiveness of financial controls and governance arrangements. In addition, external auditors provide annual independent assurance regarding our trust's financial statements and internal control environment. These combined layers of oversight help ensure that risks relating to fraud or financial irregularity are identified and addressed appropriately.

6.0 Fraud prevention and training

6.1 Fraud prevention within our trust is supported by a comprehensive framework of policies that collectively establish clear rules, responsibilities, and financial controls.

6.2 Our trust's scheme of delegation (and financial scheme of delegation) sets out the governance structure of the organisation and clearly defines the roles, responsibilities, and authority levels of trustees, committees, senior leaders, and academy leaders. By establishing clear lines of accountability and appropriate approval thresholds, the scheme of delegation ensures that no individual has unrestricted control over financial decisions, thereby reducing the risk of fraud or misuse of resources.

6.3 Our trust's finance policy provides the primary framework for financial management and internal control. These procedures establish clear authorisation requirements for expenditure, ensure the segregation of key financial duties, and require regular financial monitoring and reporting. Financial reconciliations, budget monitoring processes, and payment approval controls are designed to ensure that financial transactions are appropriately reviewed and verified.

6.4 Procurement and tendering arrangements also play an important role in mitigating fraud risk. Our trust's tendering and procurement policy requires competitive procurement processes for higher value purchases and ensures transparency in supplier selection. The policy also requires the declaration of conflicts of interest and appropriate approval processes for contracts and purchasing decisions. These measures reduce the risk of bribery, collusion, or favouritism in procurement activities.

6.5 Our trust's credit card policy establishes clear expectations regarding the use of trust credit cards, including restrictions on authorised cardholders, spending limits, and the requirement to provide supporting documentation for all purchases. Transactions are subject to independent review and reconciliation to ensure that expenditure is legitimate and properly authorised.

6.6 Similarly, the staff expenses policy ensures that any claims for reimbursement relate solely to legitimate trust business and are submitted via TOPdesk. Claims must be supported by receipts and approved by an appropriate manager before payment is processed. This process helps ensure transparency and reduces the risk of fraudulent or inappropriate expense claims.

6.7 Our trust also maintains a whistleblowing policy which encourages staff and stakeholders to report concerns about fraud, financial malpractice, or unethical conduct. The policy provides a confidential mechanism through which concerns can be raised without fear of retaliation, ensuring that potential issues can be identified and addressed at an early stage. The policy is always available on our trust website.

6.8 All staff will receive annual anti-fraud training in order to support in their knowledge and understanding of how to support in the prevention of fraud.

6.9 Members of staff who work in the finance team will receive additional regular training regarding the prevention, detection and reporting of fraud through team meetings, 1:1s, CPD and coaching. All members of the finance team will be notified of any updates received through the DfE fraud alerts in order to be aware of education specific concerns. These updates will be shared with other staff where relevant.

7.0 Detection and reporting of fraud

7.1 Our trust recognises that effective fraud prevention also relies on the timely detection of potential irregularities. Fraud may be identified through several mechanisms, including routine financial monitoring, internal scrutiny reviews, external audit findings, whistleblowing disclosures, or concerns raised by staff or third parties. Regular financial reconciliations and management oversight provide additional opportunities to identify unusual transactions or inconsistencies that may require further investigation.

7.2 All employees are expected to remain vigilant and to report any concerns relating to potential fraud or financial irregularity as soon as they arise.

7.3 Any suspicion of fraud or financial irregularity must be reported immediately to an appropriate senior officer within our trust. In most circumstances this will be the chief financial officer or the accounting officer. Where the concern relates to one of these individuals, the matter should be reported directly to the chair of trust board through the whistleblowing process. Concerns may also be raised with the chair of trust board or the chair of the finance and / or audit committee by any employee through the whistleblowing process.

7.4 Prompt reporting ensures that concerns can be reviewed quickly and that appropriate steps can be taken to protect trust assets and investigate the matter.

7.5 Near misses will be recorded by the finance team in a register and these will be reported to the finance committee and audit and risk committee on annual basis.

8.0 Response to and investigation of fraud

8.1 When a concern relating to potential fraud is reported, our trust will take appropriate steps to assess the situation and determine whether further investigation is required. Initial actions may include recording the allegation, securing relevant documentation or financial records, and conducting a preliminary review of the information available. Where necessary, steps may also be taken to reduce further risk, such as restricting access to financial systems or assets.

8.2 Immediately upon becoming aware of suspected fraud our trust will take appropriate action to preserve evidence which may include:

- securing accounting records
- preserving electronic files and emails
- retaining CCTV where available
- protecting audit trails within finance systems
- securing payroll records
- preserving procurement documentation
- taking copies of system logs
- restricting access to prevent alteration or destruction of records

8.3 No documents relating to an investigation may be destroyed until the investigation has concluded and all statutory reporting requirements have been completed.

8.4 Investigations may be conducted internally by senior leadership, including the chief financial officer, or through our trust's internal scrutiny arrangements. In more complex or significant cases, the trust may seek support from external auditors or professional advisers to ensure that the matter is investigated thoroughly and independently.

8.5 The purpose of the investigation is to establish the facts, determine the extent of any financial loss, identify any weaknesses in internal controls, and recommend appropriate corrective actions.

8.6 The investigation lead should prepare a report including the following items which will be shared with the finance committee:

- background
- allegation
- methodology
- evidence reviewed
- findings
- financial impact
- control weaknesses
- recommendations
- recovery actions
- disciplinary outcome
- lessons learned

8.7 Our trust will retain all investigation documentation, evidence, interview notes, correspondence, reports and outcomes in accordance with our trust's date protection policy.

8.8 Where legal proceedings are anticipated, documentation will be retained until all proceedings have concluded, regardless of normal retention periods.

8.9 Access to investigation records will be restricted to authorised officers only.

9.0 External investigation reporting

9.1 Where fraud or financial irregularity is confirmed or reasonably suspected, our trust will comply with its reporting obligations to the Department for Education in accordance with the requirements of the Academy Trust Handbook. Depending on the circumstances, our trust may also report the matter to the police, external auditors, insurers, or other relevant regulatory bodies.

10.0 Disciplinary action and recovery of losses

10.1 Where an investigation determines that an employee has been involved in fraudulent activity, the matter will be addressed through the trust's disciplinary procedures. Disciplinary action may include suspension during investigation, formal disciplinary proceedings, or dismissal for gross misconduct where appropriate. Our trust will also consider appropriate measures to recover any financial losses incurred as a result of the fraudulent activity.

10.2 Where third parties are involved, our trust may pursue recovery through contractual or legal routes.

11.0 Lessons learned

11.1 Following any confirmed fraud or significant irregularity, our trust will review its internal controls and governance arrangements to identify any weaknesses that may have contributed to the issue. Lessons learned from investigations will be used to strengthen procedures, update policies where necessary, and provide additional training or guidance to staff.

11.2 The outcomes of any investigation and subsequent control improvements will be reported to the finance committee and audit and risk committee and the trust board to ensure appropriate oversight and continuous improvement of our trust's control environment.

12.0 Internal annual reporting

12.1 The chief financial officer will present an annual summary report to the audit and risk committee detailing:

- the number of fraud allegations received
- investigations completed
- confirmed frauds
- financial losses and recoveries
- emerging fraud risks
- actions taken to strengthen controls

12.2 Where there are no cases during the year, a nil return will be reported.

13.0 Monitoring and review

13.1 This policy will be reviewed every two years and will be approved by the audit and risk committee.