Kingsley Primary School

Anti-Fraud, Corruption, Theft and Bribery Policy

January 2026
To be reviewed January 2027

Policy Statement

Kingsley Primary School is committed to the prevention of fraud, theft, bribery and corruption and the promotion of an anti-fraud culture.

The culture is one of honesty and is opposed to fraud, theft, bribery and corruption. There is an expectation that all individuals and organisations associated with Kingsley Primary School will act with integrity, and that employees at all levels will lead by example in these areas.

The aim of this Policy is to:

- encourage the prevention of fraud, corruption, theft and bribery;
- promote the early detection of the above
- clarify the responsibilities of all Governors and employees including declaring of business and pecuniary interests,
- explain how suspicions can be reported,
- summarise the procedure for investigations.
- Summarise the procedures for accepting gifts and hospitality

This policy will endeavour to highlight all possible steps to prevent and eliminate fraud of any kind. It identifies a clear path for both Governors and employees to report any suspicion of fraud without any fear of discrimination.

Definitions of Fraud, Theft, Bribery and Corruption

Fraud

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.

Whilst the act does not provide a single definition of fraud, it may be described as,

'Making dishonestly a false representation with the intention to make a gain for oneself or another or to cause loss to another or expose him to a risk of loss.'

or

'Dishonest conduct with the intention to make gain, or cause a loss or the risk of a loss to another.'

Theft

Theft is dishonestly appropriating property belonging to another with the intention of permanently depriving the other of it.

Bribery

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.

A criminal offence will be committed under the Act if:

- An employee or associated person acting for, or on behalf of, the school offers, promises, gives, requests, receives or agrees to receive bribes.
- An employee or associated person acting for, or on behalf of the school, offers, promises or gives a bribe to a public official with the intention of influencing that official in the performance of their duties.
- And, in either case, the school does not have the defence that it has adequate procedures in place to prevent bribery.

Corruption

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.

Examples of what could constitute fraud and corruption include, but are not limited to, the following:

- Theft of cash
- Non-receipt of income
- Substitution of personal cheques for cash
- Travelling and subsistence claims for non-existent journeys or events, or inflating claims
- Manipulating documentation to increase salaries
- Payment of invoices for goods received by an individual rather than the school
- Unauthorised borrowing of equipment
- Failure to declare a conflict of interest
- Concealing a generous gift or reward
- Creation of false documentation
- Sending invoices for goods and services that weren't ordered or received
- Using the school's credit or debit card to make personal purchases
- Intercepting a school cheque and amending the name of the payee and/or the amount
  Submitting false claims for sickness or expenses

Key Responsibilities

The Governors of Kingsley Primary School will:

- Review the policy and ensure it remains effective and relevant to the needs of the School
- Ensure that staff recruitment is carried out in accordance with the Recruitment and Selection Policy to ensure that only honest employees are offered contracts of employment
- Declare any interests or offers of gifts or hospitality which are in any way related to the performance of their duties in relation to the School
- Supporting the concept of induction and training for employees/Governors

The Head Teacher is responsible for:

- Developing, implementing and maintaining adequate systems of internal control to prevent and detect fraud
- Monitoring compliance with internal controls and agreed policies and procedures
- Investigating all allegations of fraud and commencing disciplinary action where appropriate
- Notifying the Chair of the Governing Body of any indications of fraudulent activity
- Reporting to the Governing Body on all aspects of fraud risk management
- Declaring any interests or offers of gifts or hospitality which are in any way related to the performance of their duties in relation to the School.

Employees are responsible for:

- Familiarising themselves with the types of fraud and dishonesty that might occur within the School
- Ensuring that their School's reputation and assets are protected against fraud
- Reporting known or suspected fraud
- Complying with the School's policies and procedures
- Declaring any interests or offers of gifts or hospitality which are in any way related to the performance of their duties in relation to the School.

Any declarations of interests should be reported to the school office. Governors will declare interests prior to starting each Governor meeting and a yearly declaration form shall be complete at the start of the school year. Staff that deal with money or can be involved in ordering resources etc. will also complete a yearly declaration of interests form.

Reporting Suspicions

Any concerns regarding fraud, theft, corruption or bribery should be reported immediately to the Headteacher in the knowledge that such concerns will be treated in confidence and properly investigated. Kingsley Primary School follows Hartlepool Borough Council's Whistleblowing Policy and all employees/Governors are made aware of the policy when starting employment/term of office.

Investigating Allegations

The Governing Body and the Head Teacher are responsible for investigating allegations of fraud of any nature. Where offences are suspected, investigations are carried out to establish the facts in a fair and objective manner.

The investigation process will include the:

- screening of the allegations or information to gauge their credibility
- securing of all evidence which must be retained in its original format i.e. not written on or marked in anyway and stored securely
- interviewing of witnesses
- taking of statements
- interviewing of people suspected of being involved
- liaison with departments or other agencies (including the police).

The investigation will be conducted in accordance with legislation in conjunction with guidance from the LA Human Resources department.

Where evidence of fraud or irregularities is found this constitutes as gross misconduct and the School will consider taking further action. This may include:

- implementing the School's disciplinary procedures where an employee is involved
- referral to the police, where appropriate, in order for them to consider taking criminal action
- reporting the control weakness identified during the investigation to the Governing Body and advising them how these weaknesses have been addressed to prevent future irregularities. The effectiveness of controls are subject to cyclical review by the LA internal audit.
- seeking compensation for all losses incurred.

Unacceptable Practice

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 an 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 under this policy.
- Accept Lavish or extravagant gifts or hospitality.
- Engage in any activity that may lead to a breach of this policy.

If staff are unsure whether to accept a gift in any situation, they should speak to the Headteacher.

Acceptable Practice

This policy does not prohibit normal and appropriate hospitality (both given or 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 in the individual's.
- It complies with local law.
- It does not include cash or a cash equivalent, e.g. vouchers, gift certificates.
- 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.

School would, in all circumstances, consider whether the gift or hospitality is reasonable and justified and to consider the intention behind the gift. It is permissible for staff to accept gifts from parents and pupils, for example, before Christmas and at the end of term/year.

Charitable donations

Charitable donations are considered to be part of the school's wider purpose. The school supports a number of charities. The school may also support fundraising events involving employees. The school only makes charitable donations that are legal and ethical.

Gifts to staff from the school

The school may, at the headteacher's discretion, provide staff with token gifts to reward efforts beyond their duties such as significant contributions towards extra-curricular activities. These gifts will be non-monetary and not excessive.