



Anti-Fraud and Corruption Policy

Introduction

Inspire Partnership Multi-Academy Trust aims to be an honest and ethical institution. As such, it is opposed to fraud and seeks to eliminate fraud by the way it conducts business. This document sets out the MAT's policy and procedures for dealing with the risk of significant fraud or corruption. In order to minimise the risk and impact of fraud, the MAT's objectives are, firstly, to create a culture which deters fraudulent activity, encourages its prevention and promotes its detection and reporting and, secondly, to identify and document its response to cases of fraud and corrupt practices.

In order to achieve these objectives, the MAT has taken the following steps:

1. The development and publication of a formal statement of its expectations on standards of personal conduct, propriety and accountability;
2. The establishment of adequate and effective systems of internal financial and management control (and a clear requirement to comply with them), and an internal audit peer review with an ongoing responsibility to review and report on these systems;
3. The development and publication of a formal statement of the procedures to be followed by employees who have a suspicion of, or concern about, possible or actual malpractice within the Academy and a fraud response plan which sets out the Academy's policies and procedures to be invoked following the reporting of possible fraud or the discovery of actual fraud.

These three steps are described in greater detail in the following sections.

Personal Conduct

The MAT aims to promote an organisational culture which encourages the prevention of fraud by raising awareness of the need for high standards of personal conduct. To help ensure that all employees are fully aware of the MAT's expectations regarding standards of personal conduct, appropriate guidance is provided by the following key statements:

- These regulations are binding on all governors, members of staff, students and constituent parts of the MAT. Refusal to observe them will be grounds for disciplinary action.
- In disbursing and accounting for all funds, the MAT must demonstrate that it is adopting high standards of financial probity. Implicit within this regime is the requirement that governors and employees of the MAT must at all times conduct financial affairs in an ethical manner.
- All members of staff, trustees and governors of MAT are responsible for disclosing any personal, financial or beneficial interest in any transaction with respect to the Academy or its related companies, minority interest companies and trading areas.
- Any person who is responsible for placing an order with a supplier (whether a contractor or not) with whom he has a personal interest must disclose this to the Head of School or the Business Manager/Office Manager.
- Governors or employees of the MAT shall never use their office or employment for personal gain and must at all times act in good faith with regard to the Academy's interests.

- Heads of Department/Budget Holders are expected to adhere to the Financial Regulations at all times and to use their best efforts to prevent misuse or misappropriation of funds and other MAT property.
- Taken together, these represent a statement of the framework within which governors and employees are expected to conduct themselves.

Systems of Internal Control

The next line of defence against fraud is the establishment of operational systems which incorporate adequate and effective internal controls designed to minimise the incidence of fraud, limit its impact and ensure its prompt detection. These controls include high level management controls such as budgetary control (designed to identify fraud which results in shortfalls in income or overspendings against expenditure) and organisational controls such as separation of duties, internal check and staff supervision. Personnel policies are also a key part of setting the culture and deterring fraud. This includes seeking to reduce the risk of employing dishonest staff by checking information supplied by employees and references obtained during the course of the recruitment process, including CRB checks.

The general framework of responsibilities for financial management and the policies relating to the broad control and management of the MAT are documented in the Financial Management and Governance Policy. The Financial Procedures are issued and updated periodically by the Chief Financial Officer. They are binding on all governors, members of staff, students and constituent parts of the MAT and are distributed to the Head of School/Headteacher, the Senior Leadership Team, Heads of Department and staff in the academies finance offices.

The MAT has also established a Finance & Audit Committee, has appointed an external auditor and the Chief Financial Officer performs a peer review type function which provides advice to management in respect of control matters and which conducts a cyclical programme of reviews of the adequacy and effectiveness of the systems which have been put in place (including those intended to minimise the potential exposure to fraud and corruption).

Fraud Response

This document sets out the MAT's policies and procedures for ensuring that all allegations and reports of fraud or dishonesty are properly followed-up are considered in a consistent and fair manner and that prompt and effective action is taken to:

- minimise the risk of any subsequent losses;
- reduce any adverse operational effects;
- improve the likelihood and scale of recoveries;
- demonstrate that the Academy retains control of its affairs in a crisis; and
- make a clear statement to employees and others that it is not a soft target for attempted fraud.

The plan includes both statements of general policy and specific steps to be taken when circumstances dictate and is necessary in order to reduce the following risks:

- inadequate communication so that action is late or inappropriate;
- lack of leadership and control so that investigators are not properly directed and waste time and effort;
- failure to react fast enough so that further losses are incurred or the evidence required for successful recovery or prosecution is lost;
- adverse publicity which could affect confidence in the MAT; and
- creation of an environment which, because it is perceived as being ill-prepared, increases the risk of fraud.

The main elements of the MAT's policy are in line with the Whistleblowing Policy and are outlined below:

1. All governors, members of staff, students and constituent parts of the MAT are required to notify immediately the Head of School/Headteacher and/or the Business Manager/Senior Office Manager of any financial irregularity, or any circumstance suggesting the possibility of irregularity, affecting the financial procedures, cash, stores or other property of the MAT. The Head of School/Headteacher and/or Business Manager/Senior Office Manager should bring this to the attention of the Chair of the Finance & Audit Committee and the Inspire Partnership Multi-Academy Trust Chief Financial Officer immediately.
2. The Head of School/Headteacher/Business Manager/Senior Office Manager will ascertain whether or not the suspicions aroused have substance. He/she will if appropriate, conduct a preliminary investigation to gather factual information and reach an initial view as to whether further action is required. The findings, conclusions and any recommendations arising from the preliminary investigation will be reported to the Chair of the Finance & Audit Committee and the Chair of Governors of the individual Academy concerned.
3. The Head of School/Headteacher will have the initial responsibility for coordinating the individual Academy's response. In doing this he/she will consult with the Academy's Human Resources Advisor regarding potential employment issues. The Head of School/Headteacher will also seek expert legal advice from the Academy's Legal Advisor on both employment and litigation issues before taking any further action.
4. The Head of School/Headteacher is required to notify the Local Governing Body and the Board of the MAT of any serious financial irregularity. This action will be taken at the first opportunity following the completion of the initial investigations and will involve, among other things, keeping the Chief Financial Officer, the Chair of Finance & Audit Committee and the Chair of Governors fully informed between committee meetings of any developments relating to serious control weaknesses, fraud or major accounting breakdowns.
5. If evidence of a fraud is forthcoming then the Board will inform the DfE as required by the Funding Agreement and will consider whether or not to refer the matter to the Police.

Chief Executive Officer:		Date:	09.01.2018
Chair of the Board:		Date:	09.01.2018