

# Anti-Fraud Policy

<b>Date to be reviewed</b>	January 2026
<b>Policy Status</b>	Recommended
<b>Responsible member</b>	Headteacher

This policy applies to all schools and stakeholders within Poppy Hill Academy Trust

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## Introduction

The aim of this Policy is to set out the School's arrangements for preventing and dealing with any irregularities in the following areas:

<b>Fraud</b>	The intentional distortion of financial statements or other School records which is carried out to conceal the misappropriation of assets
<b>Corruption</b>	The giving or acceptance of an inducement or reward which may influence the action of a person.
<b>Theft</b>	The dishonest appropriation of property with the intention of depriving the owner permanently of the possession.
<b>Breaches of Regulations</b>	Failure to observe School Financial procedures or Codes of Conduct.

## Policy Statement

Poppy Hill Church of England Multi Academy Trust values its reputation for financial probity. We recognise that over and above any financial damage that may be caused, any fraudulent activity will reflect adversely on the school's reputation in both the local and wider community, and ultimately the education of the pupils. Our aim is to limit the school's exposure to fraud.

All staff, Trustees and Members of the school are expected to:

- Act with integrity at all times.
- Comply with the seven principles of public life developed by the Nolan Report and incorporated in the Code of Conduct for Board Members of Public Bodies.
- Lead by example in adhering to financial regulations as set out in the Academies Handbook issued by the Education & Skills Funding Agency (ESFA), the Funding Agreement approved by the DFE and the trusts schools own Finance Manuals.
- Complete a disclosure of related party interests annually and be given the opportunity to declare any conflict of interests at any meeting attended.
- Raise any concerns as soon as they are suspected.

The Academy will:

- Encourage our employees, Trustees and Members to be vigilant and report any suspicion of fraud or irregular activity (please refer to the School's Whistleblowing Policy).
- Ensure a 'zero tolerance' culture is promoted within the school, for example through financial regulations, disciplinary procedures, checks on new staff, induction process, staff training, vetting of contractors.
- Ensure the Anti-Fraud Policy is available to Trustees and staff alike, alongside the Audit Commission publication 'Fraud risks in schools, advice for school governors'.
- Provide suitable channels of communication, ensuring sensitive information is treated as such.
- Investigate alleged fraud thoroughly and contact external advisers or bodies if appropriate. The ESFA must be informed if losses of £5,000 individually or cumulatively arise in a financial year. Unusual or systematic fraud, regardless of value, must also be reported.
- Assist police and other appropriate authorities in the investigation and potential prosecution of those suspected of fraud.

## **Systems of Controls**

### **1. Qualified Personnel**

- Appointment of appropriately qualified members of staff to undertake financial management roles within the school.

### **2. Segregation of Duties**

- To provide adequate segregation of duties to ensure compliance with recommended financial practice.
- Where possible, purchase orders, invoice authorisation and cheque signing are undertaken by different members of the Senior Management Team to prevent one person having overall control.

### **3. Adequate Reporting**

- The Finance Officer will undertake monthly reconciliations of the bank statements to the accounting system and report any discrepancies to the Accounting Officer, CFO and/or Responsible Officer.
- Monthly reports will be prepared by the CFO. The reports will detail actual income and expenditure against budget, with a clear explanation of notable variances given. These reports will be presented to the Trustees.

- As part of the annual business cycle, the School's Budget will be presented for review, consideration and approval by the Trustees.

#### **4. External Checks & Audit**

- The Internal Auditor will undertake a series of termly and spot checks which have been approved by the Trustees. The Internal Auditor will write up their findings and report these to the Accounting Officer. This report will be presented to the Trustees on a termly basis.
- External Auditors have been appointed and will audit the school on an annual basis, and at any other time as necessary.

#### **Raising Concerns Procedure**

The Governing Body is committed to the highest possible standard of operation, probity and accountability. In line with that commitment, employees and others with serious concerns about any aspect of the school's work are encouraged to come forward and voice those concerns. The school's "Whistleblowing Policy" makes it clear that employees can do so without fear of reprisals; it is intended to encourage and enable employees to raise serious concerns within the school rather than overlooking a problem or blowing the whistle outside in an inappropriate way.

#### **Contacts**

Responsible Officer – Mrs Susan Baker - [suebaker.shefford@ntlworld.com](mailto:suebaker.shefford@ntlworld.com)

Accounting Officer – Mrs Caren Earp – [cearp@henlowacademy.org.uk](mailto:cearp@henlowacademy.org.uk)

Chair of Governors - Mr Perry Huntley – [phuntley@poppyhill.org.uk](mailto:phuntley@poppyhill.org.uk)

Chief Financial Officer – Mrs Mandy Salzen – [msalzen@henlowacademy.org.uk](mailto:msalzen@henlowacademy.org.uk)

External Auditor – Mrs India Payne – [india.payne@pricebailey.co.uk](mailto:india.payne@pricebailey.co.uk)