

# ANTI-FRAUD, BRIBERY AND CORRUPTION POLICY AND STRATEGY



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| <b>Summary</b>  | Anti-Fraud, Bribery and Corruption Policy and Strategy        |  |   |
| <b>Responsible Person/Author:</b>                           | Head of Governance and Compliance                             |  |   |
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## Introduction

1. This document sets out the Rodillian Multi Academy Trust (“the Trust”) policy for dealing with fraud, bribery, or corruption or suspected fraud, bribery or corruption. The policy details the arrangements for the Trust for such concerns or suspicions to be raised by (“members of Trust Governance”) including Members, Trustees, Local Review Board (“LRB”) members; Trust employees; or members of the public.

## Scope and Purpose of this policy and who it applies to

2. The Trust is committed to improving its financial efficiency and effectiveness demonstrating strong financial controls and high performance against School Trusts of a similar size.
3. The purpose of this policy is to provide control over the Trust’s resources and provide the Board of Trustees with assurances that resources are being applied to the achievement of the Trust’s strategic plan and the following objectives of the Trust:
  - That the Trust remains financially viable on a going concern basis.
  - That the Trust achieves value for money.
  - That the Trust fulfils its responsibility for the provision of effective financial controls over the use of public funds.
  - That the Trust complies with all relevant legislation.
  - That the financial responsibilities of the Trust are managed efficiently, effectively and economically.
4. The purpose of this policy is also:
  - To confirm the commitment of the Trust to preventing and detecting fraud, bribery and corruption.
  - To identify the stance of the Trust to fraud, bribery and corruption.
  - To minimise the risk of fraud, bribery and corruption and any losses it experiences from the same.
  - To embed the management of the risk of fraud, bribery and corruption within the culture of the Trust.
5. This policy applies to all members of Trust Governance, Trust employees as well as consultants, vendors, contractors and any other party who has a financial relationship with the Trust. The policy will be brought to the attention of all employees as part of their induction.
6. Non-compliance with this policy by employees may lead to disciplinary action being taken against them. The Trust is also the sole shareholder in the company known as Southway at the Rodillian Academy Limited (Company number 08492483) (“Southway”) which operates the Southway Key Stages 3 and 4 extended educational provision. This policy applies to Southway (an Independent School), its employees, directors, consultants, vendors, contractors or any other party who has a financial relationship with Southway as if it was an Academy of the Trust.

### Publication of this policy

7. This policy will be brought to the attention of all staff and members of Trust Governance and will be available to them to read as needed. Following any amendment or replacement of this policy, an updated version will be made available to all staff and they will be advised by email where they may access the amended or replaced policy.
8. Guidance on any aspect of this policy can be obtained from the Head of Governance and Compliance. [amarham@rodillianacademy.co.uk](mailto:amarham@rodillianacademy.co.uk)

### Responsibility for this policy

9. The Trust Board has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory or Trust framework. The Trust has delegated day to day responsibility for operating this policy to the Trust Executive.
10. The Trust Board has a duty to ensure it provides a secure environment for the Trust employees to work in where concerns can be raised without it reflecting badly on them. This extends to ensuring staff feel protected when carrying out their duties and not placed in a vulnerable position
11. The Trust Board has a duty to ensure staff who have concerns about any procedures or processes that they are asked to be involved in are listened to and those concerns are addressed.
12. In implementing this policy, the Trust Executive must ensure that all staff are treated fairly and within the provisions and spirit of the Trust's Equal Opportunities policy. Special attention should be paid to ensure the policy is understood where there may be any barriers to understanding caused by the individual's circumstances, where the individual's literacy or use of English is weak or where the individual has little experience of working life.

### Aims of this Policy

13. To allow breaches of the policy to be notified to the Trust or for the same to be reported in accordance with the Trust's Whistleblowing policy.
14. To encourage openness and for the Trust to support anyone who raises genuine concerns in good faith under the policy even if they turn out to be mistaken.
15. To show the Trust's commitment that no one who reports suspected fraud, corruption or bribery suffers detrimental treatment as a result of reporting in good faith their suspicion that the terms of this policy have been breached. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment you should escalate the matter within the Academy, or, if this is not possible raise the same with the Head of Governance and Compliance, the Finance Director or the Human Resources ("HR") Director or follow the procedure set out in the Trust's whistleblowing policy.
16. To eliminate fraud, bribery and corruption in order to maintain an honest, open and well intentioned atmosphere to allow the Trust to fulfil its objectives.

17. To aid the elimination of fraud, bribery and corruption by showing how the Trust will investigate allegations against those in the Trust who are involved in such acts to allow the Trust to take appropriate action including possible criminal prosecution and civil recovery proceedings.

## Fraud

18. The Fraud Act 2006 created a single offence of fraud and referred to 3 occasions where it could potentially happen in respect of the Trust: -

- False representation where someone dishonestly makes an untrue or misleading statement with the intention of making a gain.
- Failure to disclose information where there is a legal duty to disclose information. This includes in respect of contracts entered into, where a Trustee or employee fails to disclose information that they will benefit from a contract.
- Abuse of position where a person holds a position to safeguard the financial interests of the Trust and they dishonestly abuse that position to make a gain from themselves or another such as distorting financial statements or records to conceal misappropriation of assets or other financial gain.

19. Other examples of fraud in the Trust could include: -

- Substitution of personal cheques for cash;
- Travelling and subsistence claims that are either inflated or for non-existent journeys or events;
- Manipulating documentation to increase sums received, e.g. false overtime claims;
- Failure to observe or a breach of the Trust's financial regulations;
- Unauthorised borrowing of equipment;
- Breach of confidentiality;
- Failure to declare a pecuniary or otherwise conflicting interest;
- Creating false documents and
- Deception

The above list is not exhaustive. If in doubt about any matter, seek clarification from the Head of Governance and Compliance or the Finance Director.

## Bribery

20. Bribery is the 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.

21. Bribery offences include: -

- Offering or accepting a bribe;
- Bribing or attempting to bribe a foreign official;
- Being a commercial organisation such as the Trust which fails to prevent bribery.

## Corruption

22. Corruption is the dishonest or fraudulent conduct of those in power, typically involving Bribery. It can include offering or acceptance of

- Inducements;
- Gifts;
- Favours;
- Payment; or
- Benefit(s) in Kind

Which may influence the action of any person. Corruption does not always result in loss. The corrupt person may not benefit directly from their deeds; but may use their position to advance another.

## Public Service Values

23. The three fundamental values of public service are:

|                       |   |
|-----------------------|---|
| <b>Accountability</b> | Everything done by those who work in the Trust must be able to stand the test of parliamentary scrutiny, public judgement on propriety and professional codes of conduct. |
| <b>Probity</b>        | Absolute honesty and integrity should be exercised in dealing with assets, employees, suppliers and the public.   |
| <b>Openness</b>       | The Trust's actions should be sufficiently public and transparent to promote confidence between the Trust, its employees and the public.                                  |

24. In addition, all those involved in the Trust including those who contract with the Trust should follow the 7 Nolan Principles of Public life

|                       |   |
|-----------------------|---|
| <b>Selflessness</b>   | They should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family or their friends.      |
| <b>Integrity</b>      | They should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties. |
| <b>Objectivity</b>    | They should in carrying out the business of the Trust including making appointments, awarding contracts or recommending individuals for rewards and benefits make choices on merit.     |
| <b>Accountability</b> | Be accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.  |
| <b>Openness</b>       | Be open as possible about all decisions and actions that are taken. Give reasons for their decisions and restrict information only when the wider public interest demands.              |

**Honesty** Be truthful and declare any private interests relating to their duties with the Trust and to take steps to resolve any conflict of interest arising in a way that protects the public interest.

**Leadership** Promote and support these principles by leadership and example.

### Responsibilities under this policy

25. All involved in the Trust have a responsibility to protect the Trust from fraud, bribery or corruption.
26. They demonstrate this responsibility by taking steps to prevent and help detect fraud by complying with the Trust's financial controls and when in a position of leadership such as the Trust Board, the Chief Executive, the Trust Executive, LRB's and Academy Principals by applying controls aimed at preventing and detecting fraud, bribery and corruption.

#### (1) Those that discover suspected fraud, bribery or corruption

27. Those involved in the Trust that suspect fraud, bribery or corruption should make an immediate note of all relevant details including the date and time of any event, details of conversations heard including telephone conversations and names of persons involved or a description where their name is not known.
28. Report your suspicions at the earliest possible opportunity with the relevant details to an appropriate level of authority such as your line manager, the Academy Principal, the Finance Director, the Chief Executive, the Head of Governance and Compliance or the Chair of the Trust Board.
29. If it is not possible for an employee to report their suspicions to their line manager, the Academy Principal, the Finance Director, the Chief Executive, or the Head of Governance or Compliance because one or more of the individuals mentioned may be involved the matter should be reported to one or both of the Chair of the Board of Trustees or the Chair of the Audit and Risk Committee.
30. The Trust would prefer information not to be provided anonymously but any anonymous information will be investigated. All reported suspicions will be dealt with sensitively and confidentially.
31. Those that discover suspected fraud, bribery or corruption should **Not:**
  - Confront or accuse anyone directly;
  - Try to investigate the matter yourself;
  - Discuss your suspicions with anyone other than those you report them to unless asked to by the person you have reported them to;
  - Be afraid to report a matter on the basis that their suspicions are groundless. All reports will be treated on the basis that they are made in good faith.



## **(2) The Trust Board**

32. The Trust Board is liable to be called to account for failing to prevent fraud, bribery or corruption. To prevent this, it is responsible for receiving assurance from the Trust Executive Team that all employees receive adequate training and support to carry out their responsibilities.
33. The Trust Board will give clear support to the Trust's anti-fraud, bribery and corruption policy by advocating the Trust's arrangements and supporting strong action when these are ignored.
34. The Trust Board is responsible for the governance of the risk of fraud, bribery and corruption and ensuring the Trust's interests are safeguarded including its reputation.
35. The Trust Board will promote an organisational culture which accords with the 7 Nolan Principles of Public life.
36. The Trust Board will promote and maintain high standards of conduct.
37. Trustees will complete an annual Declaration of Interest form and bring to the attention of the Head of Governance and Compliance in good time any specific item of interest on an Agenda, where they may be conflicted. Members of the Trust and LRB members should also do this.
38. The Trust Board must notify the Education and Skills Funding Agency ("ESFA") of any fraud, theft or other irregularity (including Bribery and Corruption) exceeding £5,000 individually or more than £5,000 cumulatively in any financial year. Unusual or systemic fraud regardless of value must be reported. In order to make a report, the Trust Executive will have to provide the Trust Board with:
  - 
  - Full details of the event(s) with dates;
  - The Financial value of the loss;
  - Measures taken to prevent recurrence;
  - Whether the matter has been referred to the Police (and if not why) and
  - Whether any loss has been offset by the Risk Protection Arrangement or any other insurance product.
39. The Trust Board will ensure that the Trust and its employees will comply with any investigation into Fraud, Bribery or Corruption conducted or commissioned by the ESFA or any other lawful authority including the Police.

## **(3) The Audit and Risk Committee**

40. The Audit and Risk Committee will regularly review this policy.
41. The Audit and Risk Committee will report such instances of suspected fraud, bribery or corruption to the Trust Board as it thinks fit.
42. The Audit and Risk Committee will review all reports of fraud, bribery or corruption reported to it and if appropriate they will: -

- Gather further factual information and reach a view as to whether further action is required.
  - Determine whether the findings, conclusions and any other investigation should be reported to the Trust Board.
  - If further investigations are required, they will determine which outside agencies should be involved.
43. The Audit and Risk Committee will ensure that the Trust’s external and internal audit processes are used to identify and manage the risk of fraud, bribery and corruption.
44. The Audit and Risk Committee will ensure that controls are put in place that minimises the risk of fraud and corruption.

**(4) The Chief Executive as Accounting Officer**

45. The Chief Executive will notify the Audit and Risk Committee and as necessary the Trust Board of any serious financial irregularities at the earliest possible opportunity following initial investigations and will keep the Chair of the Audit and Risk Committee and the Chair of the Trust Board fully informed between meetings of any developments and control weaknesses identified.

**(5) The Head of Governance and Compliance**

46. The Head of Governance and Compliance is responsible for the implementation of this policy, monitoring compliance and reporting violations of this policy. The Head of Governance and Compliance will review the suitability, adequacy and effectiveness of the Trust’s Anti-Fraud, Bribery and Corruption arrangements and implement improvements where appropriate. In this regard, he will keep himself updated of ESFA reports about its investigations and financial management and governance reviews of Academy Trusts and recommend any improvements together with any published ESFA guidance.
47. The Head of Governance and Compliance will decide whether there is sufficient cause to investigate a suspicion of fraud, bribery or corruption and whether the Police and other external agencies need to be informed. Where sufficient evidence exists, they will inform the Police that a criminal offence may have been committed.
48. The Head of Governance and Compliance can consult and take advice from the Finance Director, the HR Director, the Chief Executive, the Chair of the Trust Board and/or the Audit and Risk Committee of the Trust Board to decide whether someone involved in the Trust should be investigated on suspicion of fraud, bribery or corruption. The Head of Governance and Compliance will not conduct a disciplinary investigation but a disciplinary investigation under the Trust’s disciplinary policy may take place separately.
49. The Head of Governance and Compliance will report all allegations of Fraud, Bribery or Corruption to the Audit and Risk Committee regardless of the lack of evidence in respect of the allegation.
50. The Head of Governance and Compliance will keep a log of all reported incidents of suspected fraud, bribery or corruption regardless of scale.

51. Depending on the outcome of the investigations (whether on an interim/ongoing or concluding basis) and/or on the potential significance of suspicions that have been raised, inform the Chair of the Trust Board and the Trust's Auditors of cases, as may be deemed appropriate or necessary.
52. The Head of Governance and Compliance will liaise with the Police and the HR Director to ensure any parallel sanctions such as criminal and disciplinary are applied effectively and in a co-ordinated manner
53. The Head of Governance and Compliance will ensure that all Members of the Trust, Trustees and LRB members have sufficient information to ensure that members of Trust Governance are aware of the Trust's arrangements for managing the risk of fraud, bribery or corruption and their financial responsibilities are being properly discharged.
54. The Head of Governance and Compliance will arrange for legal advice to be obtained on any civil recovery proceedings including the recovery of assets and losses in appropriate cases.

#### **(6) The Finance Director**

55. The Finance Director will maintain adequate internal control arrangements
56. The Finance Director will ensure that all suspected financial irregularities are reported to the Head of Governance and Compliance.
57. The Finance Director will support the Finance Team and other employees in preventing fraud, bribery and corruption.
58. The Finance Director will provide assurance on the appropriateness and effectiveness of systems and procedures including that financial considerations are fully taken into account in reaching decisions
59. The Finance Director will support the investigation of serious suspected financial irregularity and liaise with Trustees to recommend changes in procedures to prevent further losses to the Trust.

#### **(7) Internal and External Auditors**

60. Any incidence of Fraud, Bribery or Corruption that comes to the attention of the Trust's Internal or External Auditors should immediately be brought to the attention of the Trust Board Chair, the Audit and Risk Committee Chair, the Chief Executive, the Finance Director and the Head of Governance and Compliance.
61. The Trust's Internal and External Auditors should carry out reviews that are designed to test the Trust's internal financial and other controls and arrangements for preventing and detecting fraud and irregularity.
62. The Trust's External Auditors should review the Trust's accounts to ensure they are free from significant fraud.

## **(8) HR Director**

63. The HR Director should be informed of any allegation of fraud, bribery or corruption involving an employee and should advise the appropriate line manager on the use of the Trust's disciplinary procedure.
64. The HR Director will advise the Head of Governance and Compliance on any matters of employment law or other procedural matter including the disciplinary procedure.
65. The HR Director will ensure that the Trust's recruitment policy and procedure establishes the record of potential employees as well as the veracity of required qualifications and membership of professional bodies in respect of propriety and integrity. Such policy and procedures apply to all potential employees including temporary and fixed term employees.
66. The HR Director will ensure that all applicants are vetted before they are employed to ascertain as far as is reasonable that they are people who will comply with this policy.
67. The HR Director will ensure that all Trust employees have sufficient induction and training to ensure that staff are kept up to date on the Trust's arrangements for managing the risk of fraud, bribery or corruption.
68. All new joiners will be bound by a contractual obligation not to engage in Bribery, Corruption or Fraud as defined in this policy.

## **(9) The Director of ICT and Data**

69. The Director of ICT and Data will contact the Head of Governance and Compliance immediately in all cases where there is suspicion that Information Technology is being used for Fraud, Bribery or Corruption. This includes inappropriate use of the internet, e-mail, telephones and personal digital assistants.

## **(10) Line Managers**

70. All line managers are expected to provide strong leadership and advocacy of this policy and support strong action when the policy is ignored.
71. Line managers at all levels of the Trust have a responsibility to ensure that an adequate system of internal controls exist within their area of responsibility and that the controls operate effectively. The responsibility for the prevention and detection of Fraud, Bribery and Corruption primarily rests with managers but requires the co-operation of all employees.
72. In demonstrating the exercise of that responsibility, line managers should:
  - Inform staff of the Trust's Expenses, Gifts and Hospitality policy, Conflict of Interest policy including the Declaration of Interests, the Trust's Financial Regulations and this policy.
  - Ensure that all Employees for whom they are responsible for are made aware of the requirements of this policy and that they themselves are aware of the requirements of this policy.
  - Assess the types of risk involved in the operations for which they are responsible.

- Ensure adequate control measures are put in place to minimise the risk of Fraud, Bribery or Corruption including clear roles and responsibilities, supervisory checks, staff rotation in key posts, separation of duties wherever possible so that control of a key function is not invested in 1 individual and regular reviews, reconciliations and test checks to ensure that control measures continue to operate effectively.
  - Identify sensitive posts or those posts where there is an increased risk of fraud, bribery or corruption.
  - Ensure that controls are being complied with.
  - Contribute to the assessment of the risks and controls within their business area, which feeds into the Trust's statements of accountability and internal control.
  - Follow Trust Recruitment policies and procedures aimed at recruiting honest high quality staff.
73. All instances of actual or suspected fraud, bribery or corruption which come to the attention of a Line Manager must be reported immediately to the Head of Governance and Compliance and the Academy Principal. It is appreciated that some employees will initially raise concerns with their manager. The Line Manager should not attempt to investigate the allegation themselves and has a responsibility to refer the matter to the Head of Governance and Compliance as soon as possible.
74. Line Managers when requested should complete and return a Declaration of Interest Form and raise any interest in a meeting when their own interest may conflict with the interest of the Trust. If Line Managers require any assistance with this, they should contact the Head of Governance and Compliance in confidence to discuss the same.
75. Trust Leaders should comply with the Trust Leadership Protocol.

**(11) Employees (Including Members, Trustees and Local Review Board members)**

76. Staff at all levels should lead by example in acting with the utmost integrity and ensuring adherence to all relevant legislation including the Bribery Act 2010, regulations, policies and procedures.
77. Staff must act in accordance with the Trust's Expenses, Gift and Hospitality policy which includes guidance on the receipt of gifts or hospitality and the Conflicts of Interest Policy which includes when Declarations of Interest should be made.
78. Staff must not request, receive or offer a bribe from/to anybody, nor imply that such an act would be considered. This includes any suggestion that the receipt of a financial or other advantage from any party would result in an incentive or reward to the other party.
79. Employees who are subject to their own professional codes of practice and professional body codes of conduct should make themselves aware of the same. All employees should familiarise themselves with and comply with the Trust's Personal Professional Conduct of Staff policy.

80. Employees should uphold a positive anti-fraud, bribery and corruption culture and remain alert to the possibility of theft, fraud and corruption occurring in the workplace and be aware of this policy and the mechanisms that can be engaged to report suspected fraud, bribery or corruption.
81. Employees should comply with the Trust's Financial Regulations. Off the book accounts and false or deceptive accounting entries are strictly prohibited.
82. Employees should be aware that fraud, bribery and corruption may well be regarded as gross misconduct under the Disciplinary policy which may lead to summary dismissal and criminal prosecution.

### Procurement Process

83. The Trust's Procurement processes will be conducted in a fair, ethical and transparent manner and not deal with contractors or suppliers known or reasonably suspected to be paying bribes or otherwise involved in fraud and/or corruption. Before engaging contractors and suppliers the Trust will undertake properly documented due diligence. Unless prospective contractors and suppliers have effective anti-fraud, bribery and corruption programmes in place, the Trust will contractually require them to comply with this policy. Agreements with contractors and suppliers shall, at all times, provide for the necessary contractual mechanisms to enforce compliance with the Trust's Anti-Fraud, Bribery and Corruption arrangements. The Trust will monitor performance and, in the case of non-compliance, require the correction of deficiencies, apply sanctions or eventually terminate the agreement.
84. The Trust will procure goods and services with quality, price and value for money determining the successful supplier or contractor. The Trust will not procure goods and services by the Trust or Trust personnel receiving or offering improper benefits.
85. The Trust will not engage in any form of Bribery or Corruption either in the United Kingdom or abroad or use intermediaries to engage in the same.
86. Any intermediary instructed by the Trust will be selected with care and any agreement with them will be concluded in accordance with this policy with a contractual obligation on the intermediary to comply with this policy and to keep proper books and records available for inspection by the Trust, its auditors or any other appropriate authority.
87. The Trust will not make payment of any facilitation payments being a payment to secure or expedite the performance of a routine action to which the Trust has a legal or other entitlement. Facilitation payments are prohibited under the Bribery Act and will not be made by the Trust or its employees or intermediaries in the UK or any other country.

### Political and Charitable Donations

88. The Trust will not make any contributions to politicians or political parties.
89. At the discretion of the Trust Board, the Trust may make a charitable donation. Any such payment cannot be made upon a suggestion that it will induce another person or other organisation to perform improperly the function or activities which they are expected to perform in good faith, impartially or in a position of trust or to reward such a person for their improper performance or function.

90. Any donations or contributions must be ethical and transparent. The recipient's identity and planned use of the donation must be clear, and the reason and purpose for the donation must be justifiable, documented and minuted. All charitable donations will be publicly disclosed.

### Sponsorship

91. Sponsorship in this policy means any contribution in money or in kind by the Trust towards an event organised by a third party in return for the opportunity to raise the Trust's profile. All sponsorship contributions must be transparent, pursuant to a written agreement, for legitimate business purposes, and proportionate to the consideration offered by the event host. They may not be made towards events organised by individuals or organisations that have goals incompatible with the Trust's ethical standards or that would damage the Trust's reputation. All sponsorships will be publicly disclosed.
92. Where commercial sponsorship is used to fund the Trust's training events, training materials and general meetings, the sponsorship must be transparent, pursuant to a written agreement, for legitimate business purposes, and proportionate to the occasion. When meetings are sponsored by external sources, then that fact must be disclosed in the papers relating to the meeting and in any published minutes.
93. Where sponsorship links to the development of guidelines and advice, this should be carried out in consultation with the Head of Governance and Compliance in conjunction with the appropriate Trust's working group independent of the sponsors. While it is recognised that consultation with industry may be necessary when developing a guideline, the overall decision on what is included should lie with the Trust personnel working on the guideline.

### The Trust's Anti-Fraud, Anti-Bribery and Anti-Corruption Processes

94. The Trust aims to have in place sufficient systems of control that prevents those that would engage in fraud, bribery or corruption succeeding. This includes the Trust's Financial Regulations and the Trust's Internal and External Audit processes. It also includes: -
- This policy as a demonstration of a Trust culture that will not tolerate fraud, bribery or corruption.
  - Compliance with the Trust's Governance Code of Conduct.
  - The Trust's Register of Interests to record interests that may bring about a conflict of interest with Trust business.
  - The Trust's Register of Gifts and Hospitality which allows the recording of information about any gifts given, attempted to be given or hospitality offered.
  - The Trust's Register of Interests and Register of Gifts and Hospitality will be retained and archived in accordance with the Trust's Records Management policy.
  - The Trust's Whistleblowing policy and procedure which allows confidential information to be provided in an effective manner.
  - The Trust's Recruitment policy and procedure.

- The Trust's Disciplinary policy and procedure.
  - The Trust's willingness to impose sanctions on those who commit fraud, bribery and corruption by co-operating with Criminal Prosecutions and taking civil recovery proceedings.
95. The Trust's culture will be to apply public standards and supporting policies and procedures which allows the maintenance of a positive anti-fraud, anti-bribery and anti-corruption culture which includes robust action to help build the right underpinning culture and be a positive impact on the Trust.

### External Communication

96. Individuals (be they employees, agency staff, locums, contractors or suppliers) must not communicate with any member of the press, media or another third party about a suspected act of bribery as this may seriously damage the investigation and any subsequent actions to be taken. Anyone who wishes to raise such issues should discuss the matter with either the Head of Governance and Compliance or the Chair of the Trust Board.

### Referral to the Police

97. Any referral to the Police should only be made after consultation with the Head of Governance and Compliance, the Chief Executive, the Finance Director and the Chair of the Trust Board. Any matters should be first raised with one of these before a referral is made to the Police.

### Working with others to prevent and fight fraud and corruption

98. The Trust will exchange information with other local and national agencies in order to identify and prevent fraud and corruption. Any employee who is found to be perpetrating a fraud on another local or national agency could be subject to disciplinary action where it calls into question the Trust's confidence and trust in the employee. As fraud and corruption can be committed against a variety of organisations, the Trust will liaise with other bodies to prevent and detect fraud, bribery or corruption including (this list is not exhaustive):

- The ESFA
- The Police;
- The National Fraud Authority;
- National Anti- Fraud Networks;
- The Trust's Internal and External Auditors;
- The Student Loan Company;
- The Department for Works and Pensions;
- Her Majesty's Revenue and Customs;
- Other public and Investigatory bodies.

99. The Trust expects that the individuals and organisations with which it deals (e.g. suppliers, contractors and service providers) will act with integrity and without thought or effort to engage in fraud, bribery or corruption.



## Other Documents

100. This policy should be read in conjunction with other Trust documents and policies which are detailed in Appendix 1.
101. A diagram setting out the Trust's Anti-Fraud, Bribery and Corruption policy and Strategy in Appendix 2.
102. Key Contacts in respect of the Trust's Anti-Fraud, Bribery and Corruption policy and Strategy are listed in Appendix 3.

## Monitoring

103. The Head of Governance and Compliance will monitor the implementation and effectiveness of the policy by monitoring reports made under the policy.
104. The Head of Governance and Compliance will monitor the relevant legislation, guidelines, and information forthcoming from the relevant statutory bodies for any recommendation or changes. Where a gap, potential inequality or shortfall in performance is identified within the policy, the Head of Governance and Compliance will advise the Board of Trustees of any changes that are needed and a proposal will be submitted to the Trust Board within an appropriate timescale. There will be a full review of the policy by the Head of Governance and Compliance prior to the stated review date where recommendations will be made for consideration by the Trust Board.

## Diversity

105. The Rodillian Multi Academy Trust is committed to a policy of celebrating diversity, promoting equality of opportunity, providing an inclusive workplace, and eliminating any unfair treatment or unlawful discrimination. This overriding objective applies to all policies and procedures relating to staff and students. The Trust will always comply with the requirements of the Equalities Act 2010 and associated guidance produced by the Department for Education.

## Appendix 1: Linked Documents to the Anti-Fraud, Bribery and Corruption Policy and Strategy

### **Finance Related Documents**

The Trust Financial Regulations

### **Other Trust Policies and Documents**

Conflicts of Interest Policy  
Disciplinary Policy and Procedure  
Expenses, Gifts and Hospitality Policy  
Records Management Policy  
Register of Gifts and Hospitality  
Register of Interests  
Trust's Professional Conduct of Staff Policy  
Whistleblowing Policy

### **Governance Documents**

Scheme of Delegation  
Terms of Reference of the Audit and Risk Committee

### **Other Documents**

[ESFA Financial Handbook](#)  
[Academy Trust Guide to reducing fraud](#)

Appendix 2: Diagram setting out the Trust's Anti-Fraud, Bribery and Corruption policy and Strategy



### Appendix 3 – Key Contacts in this Policy

|  |                    |   |
|--|--------------------|---|
| Chair of the Trust   | Annette Hall       | ahall@rodillianacademytrust.co.uk   |
| Chair of the Audit and Risk Committee and Whistleblowing Trustee | Stewart Harper     | sharper@rodillianacademytrust.co.uk   |
| Chief Executive and Accounting Officer                           | Andy Goulty        | <a href="mailto:agoulty@rodillianacademy.co.uk">agoulty@rodillianacademy.co.uk</a><br>Tel: 07891 277919 |
| Head of Governance and Compliance                                | Adam Marham        | <a href="mailto:amarham@rodillianacademy.co.uk">amarham@rodillianacademy.co.uk</a><br>Tel: 0781 0894537 |
| Finance Director   | Neville Lawson     | <a href="mailto:nlawson@rodillianacademy.co.uk">nlawson@rodillianacademy.co.uk</a><br>Tel: 07939 368342 |
| HR Director  | Denise Kriens      | <a href="mailto:dkriens@rodillianacademy.co.uk">dkriens@rodillianacademy.co.uk</a><br>Tel: 07903 842811 |
| Action Fraud   | Anti-Fraud Charity | Tel: 0300 123 2040  |

## Appendix 4 - Equality Impact Assessment

### Equality Impact Assessment

Equality, Diversity, Cohesion, and Integration Screening.

As a public authority, the Rodillian Multi Academy Trust needs to ensure that all our strategies, policies, service, and functions, both current and proposed have had proper consideration of equality, diversity, cohesion, and integration.

A **screening** process can help judge relevance and provides a record of both the **process** and **decision**. Screening should be a short, sharp exercise that determines relevance for all new and revised strategies, policies, services, and functions. Completed at the earliest opportunity it will help to determine:

- the relevance of proposals and decisions to equality, diversity, cohesion, and integration.
- whether or not equality, diversity, cohesion, and integration is being/has already been considered, and
- whether or not it is necessary to carry out an impact assessment.

|  |  |
|--|--|
| <b>Organisation:</b><br>The Rodillian Multi- Academy Trust | <b>Department responsible for the Policy:</b><br>Head of Governance and Compliance |
| <b>Lead Person:</b><br>Adam Marham                         | <b>Contact Number:</b>   |

**1. Title:** Anti-Fraud, Bribery and Corruption Policy

|  |
|--|
| <b>2. Please provide a brief description of what you are screening</b> |
| The Policy   |

|  |            |           |
|--|------------|-----------|
| <b>3. Relevance to equality, diversity, cohesion, and integration</b>                          |            |           |
| <b>Questions</b>   | <b>Yes</b> | <b>No</b> |
| Is there an existing or likely differential impact for the different equality characteristics? |            | x         |
| Have there been or likely to be any public concerns about the Policy or proposal?              |            | x         |
| Could the proposal affect how services are organised, provided, located and by whom?           | x          |           |
| Could the proposal affect our workforce or employment practices?                               | x          |           |
| Does the proposal involve or will it have an impact on: -                                      |            |           |
| • Eliminating unlawful discrimination, victimisation, and harassment                           |            | X         |
| • Advancing equality of opportunity  |            | X         |
| • Fostering good relations   | x          |           |

|  |
|--|
| <p><b>4. Considering the impact on equality, diversity, cohesion, and integration</b></p> <ul style="list-style-type: none"> <li>• <b>Scope of the proposal:</b> Staff</li> <li>• <b>Who is likely to be affected?</b> Staff</li> <li>• <b>Consultation and engagement activities with those likely to be affected?</b> Ongoing feedback from staff. The Policy is available through the Trust and Academies websites and a written copy can be provided on request.</li> </ul> <p>• <b>Key findings</b><br/> We have considered the potential positive and negative impact on different equality characteristics in relation to the Policy and do not believe that any groups will be adversely affected. The Trust is vigilant in adhering to the appropriate legislation in relation to protected characteristics and to preventing discrimination. Managers are supported and trained in relation to these areas. The Policy has considered religious, racial and gender-specific clothing requirements and those of staff with disabilities in line with the Equality Act.</p> <p>We have considered the perception that the proposal could benefit one group at the expense of another and we do not believe that the Policy could be perceived to be discriminatory with regards to its wording or format.</p> <ul style="list-style-type: none"> <li>• <b>Actions</b><br/> The Trust will continue to promote positive impact and remove/reduce negative impact through the application of this Policy within the organisation.</li> </ul> |
|--|

|  |                                   |             |
|--|-----------------------------------|-------------|
| <p><b>5. Governance, ownership, and approval</b><br/> Please state here who has approved the actions and outcomes of the screening</p> |                                   |             |
| <b>Name</b>  | <b>Job title</b>                  | <b>Date</b> |
| Adam Marham  | Head of Governance and Compliance | 30.03.2021  |
|  |                                   |             |

|   |            |
|---|------------|
| <p><b>6. Publishing</b><br/> This screening document will act as evidence that due regard to equality and diversity has been given.</p> |            |
| <b>Date screening completed</b>   | 30.03.2021 |
| <b>Date agreed at Trust Board</b>   | 28.04.2021 |