

PARKSIDE HOUSE SCHOOL

ANTI FRAUD AND CORRUPTION
POLICY

July 2014

Anti Fraud and corruption policy

Introduction

1. In order to demonstrate its commitment to combating fraud and corruption, Parkside House School has its own robust anti- fraud anti – corruption policy.
2. Fraud and corruption have also been defined in the Fraud Bill 2006 as:
 - Fraud – “*the intentional distortion of financial statements or other records by persons internal or external to the organisation which is carried out to mislead or misrepresent*”.
 - Corruption (as stated elsewhere in these policies) - “the offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person.”
3. The Fraud Bill (as stated elsewhere in these policies) sets out a general offence of fraud as follows:

“A dishonest act where a perpetrator intends to make a gain for themselves or cause loss to another”
4. This policy statement outlines the organisation’s commitment to ensuring that risk of fraud and corruption is minimised and that its dealings and those of its employees, and its other partners are open and honest.
5. The policy also applies to such dishonest acts as deception, bribery, theft, forgery, extortion, corruption, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion.

Statement of Intent

6. Parkside House School will not tolerate fraud and corruption in the administration of its responsibilities, whether from inside or outside. It expects the highest standards of conduct from all that have dealings with including staff, members, contractors, and the public. It is committed to ensuring the risk of fraud and corruption and the potential losses that might result are minimised.

7. Parkside House School will do this by putting in place processes and procedures that will deter prevent and detect fraud, corruption, or illegality. In carrying out its functions and responsibilities, Parkside House School and its representatives will be open, honest, and fair and will adopt the highest standards of integrity, suitability, and accountability.
8. To demonstrate that it promotes a culture that opposes fraud and corruption, Parkside House School will be open honest and fair when carrying out its functions and responsibilities. It expects and encourages the same from directors, employees, and third parties, including sub-contractors and their employees, who work in partnership with them.
9. Parkside House School employees play an important role in creating and maintaining this culture. They are encouraged to raise concerns regarding fraud and corruption, immaterial of seniority, rank, status in the knowledge that such concerns will wherever possible be treated in confidence.

Prevention of fraud and corruption

10. Parkside House School has in place a framework of preventative measures, including controls, designated to prevent fraud and corruption occurring in the first instance.
11. Most significant among these are:
 - Codes of conduct
 - A register of interests
 - Registers of gifts and hospitality
 - Disciplinary procedures for employees
 - A public interest disclosure (Whistle blowing) Policy
 - Financial procedure rules

Detection and Investigation

12. It is the responsibility of trustees, directors and managers to promote the anti-fraud and anti-corruption policy within their areas. Managers are expected to actively deter, prevent and detect fraud by maintaining good control systems and ensuring that their staff are familiar with them.

13. There are clear routes by which such matters should be drawn to the attention of the organisation. Concerns must be reported initially to either the relevant director, or a designated senior manager, depending upon the nature of any alleged offence.

14. Directors are required to:

- ensure that all suspected irregularities are reported to the designated manager (significant confirmed cases will be reported to the Managing Director/Chief Executive)
- Instigate the organisation's disciplinary procedures where the outcome of an investigation indicates improper behaviour.

15. Parkside House School has a fraud response plan that outlines the actions that should be taken, and gives guidance to anyone undertaking or assisting in the investigation of fraudulent, corrupt, illegal or irregular activities. The response plan identifies who, based on qualifications and experience, will normally carry out investigations. It also outlines how investigations will be carried out to ensure compliance with relevant legislation.

16. Where sufficient evidence exists to indicate that a criminal offence has been committed, the Police will be notified in accordance with Parkside House School.

17. Where Parkside House School is working as a contractor to or on behalf of another organisation, it will maintain links and share information with the organisation and third parties including:

- Northumbria Police
- Department for Work and Pensions
- Other suppliers, agencies and appropriate bodies

Deterrence

18. Theft, fraud, and corruption are considered to be serious offences against Parkside House School its clients and customers. Parkside House School will not seek to cover up dishonest acts carried out against it. It will publicise its approach to prevention and detection of fraud of fraud and corruption, and will start appropriate disciplinary or legal action as considered necessary in each case.

19. Disciplinary action will be taken if it is shown that employees or directors have been involved in theft, fraud or corruption otherwise acted illegally. Criminal proceedings will also be considered in

addition or as an alternative, depending on the circumstances of each case.

20. Parkside House School in consultation with any appropriate partner organisations- will seek to optimise the publicity opportunities arising from the investigation and prosecution of criminal offences.
21. In all cases where Parkside House School, or any of its partner organisations, has suffered financial loss recovery action will be taken. Every effort will be made to ensure that maximum recovery is made where losses can be demonstrated.
22. Parkside House School recognises that the success and credibility of this strategy depends on effective training and the awareness of directors and employees throughout the organisation.
23. Awareness will be further raised through the display of posters and distribution of leaflets highlighting the types, causes, and consequences of fraud and corruption.