



The Holy Family of Nazareth Catholic Academy Trust

Anti-Fraud and Corruption Policy

Date of policy: **October 2020**

Date last review adopted by HFNCAT Board: **December 2020**

Frequency of review: **Annual**

Date of next review: **October 2021**

This Policy should be read in conjunction with the Code of Conduct applying to employees. The Code relates to Conduct with regard to both financial and non-financial matters. Breaches of the Code by employees may result in disciplinary action being taken in accordance with the various Conditions of Service.

The Trust expects all employees to conduct themselves at all times having regard to the very highest standards of conduct, probity and confidentiality. The Trust has taken reasonable steps to ensure that there are appropriate financial and management controls in place to safeguard Trust funds and assets and to prevent and detect fraud and corruption.

The Trust will fully investigate any allegations of fraud and corruption as soon as the allegation is notified in accordance with the procedures detailed below. If an employee suspects that improper, fraudulent or corrupt behaviour has occurred within the Trust, the following procedures should be undertaken (it is to be emphasised that the identity of the individual will be kept confidential so long as it does not hinder any subsequent investigation).

An immediate note should be made by the employee of the concerns; all relevant details of conversations, dates, times and names should be noted.

Other than in the circumstances noted below, in order to ensure that the Trust does not suffer any loss of any nature, full details of the matter, including notes, should be reported without delay to the CEO. He/she will decide on the appropriate investigation or action that should be taken.

Any allegations of wrongdoing made against an employee or employees of the Trust will be investigated and dealt with under the established disciplinary procedures.

Any allegations relating to an individual's financial conduct will be reported without delay to the CEO. He/she will then decide on the most appropriate action to be taken in order to reduce the possibility of any financial loss to the Trust. He/she will also instruct the Trusts Internal Auditors to carry out an investigation and to report subsequently to the Audit Committee.

Where for whatever reason the employee making an allegation considers it inappropriate to follow the procedure above, the matter should be reported directly to the Chair of Governors as appropriate. Such allegations might be in respect of the behaviour of a senior officer of the Trust, a lay member of the governing body or about the propriety of a committee or other collective decision. An employee may use this route if they are concerned that use of the above procedures may jeopardise their position within the Trust.

In any case where an allegation has been made, the person to whom the allegation is reported should make a record of its receipt and of what subsequent action is taken. Any allegation made under this procedure will be the subject of a preliminary investigation either by the person to whom the allegation is made, or more usually by a person or persons appointed by him/her. The allegation shall be reported in confidence to the Audit Committee at the commencement of the investigation and the results reported to them at its conclusion.

Where no investigation is carried out, and the allegation is effectively dismissed, the person making the allegations shall be informed and given the opportunity to remake the allegation to some other person or authority within the Trust, if he or she is unsatisfied with the decision.

Where an allegation is dismissed after an investigation, the person or persons against whom the allegation is made will be told of the allegation, the evidence supporting it and be allowed to comment before the investigation is concluded and a report made to the Audit Committee. The Audit Committee should satisfy itself that there is no case to answer and report their findings and reasons to the complainant.

Any person making any allegation shall be guaranteed that the allegation shall be regarded as confidential to the receiver and, in some cases, the Director of Finance, until an investigation is launched. Thereafter the identity of the person making the allegation may be kept confidential, if requested, unless this is incompatible with a fair investigation, or if there is an overriding reason for disclosure (for example, if police involvement is required).

Provided the allegation has been made lawfully, without malice and in the public interest, the employment position of the person will not be disadvantaged for reasons of making the allegation.

The Trust Board **must** notify [ESFA](#), as soon as possible, of any instances of fraud, theft and/or irregularity exceeding £5,000 individually, or £5,000 cumulatively in any financial year. Unusual or systematic fraud, regardless of value, **must** also be reported. The following information is required:

- full details of the event(s) with dates
- the financial value of the loss
- measures taken to prevent recurrence
- whether it was referred to the police (and if not why)
- whether insurance or the RPA have offset any loss.

Please also see the Trust's whistle-blowing policy and procedures.

