



Alleyne's School Policies & Procedures

Anti-Fraud Policy

Name of Policy	Anti-Fraud Policy
ISSR	N/A
Reviewed by	Claire Morgan
Author/SLT	Lara Akande Joseph (Legal Counsel)
Date of school review	September 2025
Date of next school review	September 2026

This policy applies to both Junior Schools and the Senior School.

Policy Overview

This document sets out the policy, procedures and commitment of Alleyne's School to preventing, detecting, and responding to fraud and other forms of dishonesty. As part of its duty to uphold high standards of integrity, transparency, and accountability, Alleyne's School adopts a zero-tolerance approach to fraud in all its forms.

Alleyne's School is committed to ensuring that all of our activities, financial, procurement and administrative, are conducted with integrity and reported honestly, accurately, transparently, and accountably. All decisions are to be taken objectively and free from personal interest. Any behaviour that falls short of these principles will not be condoned.

Staff and associated third parties must remain aware of the risk of fraud, corruption, theft, and other forms of dishonesty.

Alleyn's School requires staff, partners, and associated third parties to act honestly and with integrity at all times, ensuring that their activities, interests, and behaviours do not conflict with these obligations. Staff must report all suspicions of fraud and any breaches they discover.

About the Policy

1. The purpose of this policy is to:
 - a) Set out our responsibilities, and those working for and on our behalf, in observing and upholding our position on fraud and dishonesty.
 - b) Provide information and guidance to those working for and on our behalf on how to recognise and deal with instances of fraud.
2. This policy may be updated or amended at any time.
3. The eight key objectives of Alleyn's School's Anti-Fraud Policy are:
 - a) Establishment of an anti-fraud culture
 - b) Maximum deterrence of fraud
 - c) Active and successful prevention of fraud that cannot be deterred
 - d) Rapid detection of fraud that cannot be deterred
 - e) Professional investigation of detected fraud
 - f) Effective internal and external actions and sanctions against perpetrators, including legal action for criminal offences
 - g) Effective communication and learning in relation to fraud
 - h) Effective methods of seeking redress where fraud has occurred
4. This document sets out the School's policy and procedures for dealing with suspected cases of fraud and provides instructions about what to do and who to contact should concerns arise.

Scope of the Policy

5. This policy applies to all persons working for Alleyn's School, its subsidiaries, or on its behalf in any capacity, including employees at all levels, Trustees, directors, officers, workers, agency workers, secondees, volunteers, interns, agents, contractors, external consultants, and third-party contractors.

Definition of Fraud

6. "Fraud" is any activity that relies on deception or dishonesty to achieve a gain for oneself, Alleyn's School, or any of its subsidiary companies. Examples include:

- Theft or misuse of funds, assets, equipment, or donations
- Falsifying invoices or creating fictitious suppliers
- Payroll manipulation
- False accounting
- Cyber-enabled fraud
- Manipulation of academic or admissions-related processes for financial gain

7. Under the Fraud Act 2006, individuals can be prosecuted if they:

- Make a false representation
- Fail to disclose information
- Abuse their position

8. Fraud offences under section 1 of the Fraud Act 2006 include:

- a) Fraud by false representation
- b) Fraud by failing to disclose information
- c) Fraud by abuse of position
- d) Participation in a fraudulent business
- e) Obtaining services dishonestly
- f) Cheating the public revenue
- g) False accounting
- h) False statements by company directors
- i) Fraudulent trading

9. Under the Economic Crime and Corporate Transparency Act 2023, organisations may also be prosecuted for failing to prevent fraud.

Responsibilities

10. Board of Governors

- Hold ultimate responsibility for oversight of the School's risk and control environment
- Approve and review the Fraud Policy and Anti-Fraud Response Plan
- Ensure adequate resources for prevention, detection, and investigation
- Receive periodic reports on fraud risk, incidents, and controls

11. Senior Executive Team

- Establish and implement the Fraud Policy and fraud response plan
- Ensure effective controls to prevent and detect fraud
- Embed a culture of integrity through leadership and training
- Ensure arrangements are in place for reporting and investigating suspected fraud
- Take appropriate action against perpetrators, including recovery of losses and prevention measures

12. Staff and Association Persons

- Demonstrate honesty, probity, and integrity in all duties
- Act in accordance with School policies
- Remain vigilant to risks and indicators of fraud
- Promote an ethical, anti-fraud culture
- Report concerns in line with the School's Whistleblowing Policy
- Assist in investigations where necessary

Reporting Fraud

13. Alleyn's School has controls and processes to mitigate and detect fraud.
14. All staff and associated persons must report suspected fraud promptly to the Chief Financial Officer. Information will be treated confidentially, and safeguards will protect those raising concerns. Alleyn's School will not tolerate harassment or victimisation of whistleblowers.
15. Malicious, frivolous, or bad-faith allegations may result in disciplinary action.

Sanctions

16. Proven fraud will result in disciplinary action, up to and including dismissal. Alleyn's School will refer matters to the police and other relevant authorities where appropriate.
17. Fraud by third parties or contractors may result in termination of contracts.
18. Following any incident, a "lessons learned" exercise will be conducted to strengthen controls and prevent recurrence.

Creating an Ethical Culture

19. Alleyn's School promotes an ethical, anti-fraud culture across all activities:
 - a) Annual anti-fraud awareness training will be provided to all employees.
 - b) Role-specific training will be delivered to staff responsible for budgets, internal controls, or financial procedures.

Monitoring and Review

20. This policy will be reviewed annually, any updates will be communicated to all staff, contractors, and third parties.

Appendix A: Anti-Fraud Response Plan

This Response Plan sets out the procedures that must be followed when a suspected fraud is identified. It ensures that all cases are dealt with promptly, effectively, and consistently, while protecting the rights of individuals and the interests of Alleyn's School.

1. Objectives

- To ensure that suspected fraud is reported and investigated quickly.
- To ensure investigations are carried out professionally, objectively, and with due regard for confidentiality.
- To minimise losses and maximise recovery.
- To take appropriate disciplinary, civil, and/or criminal action against perpetrators.
- To implement lessons learned and strengthen internal controls.

2. Immediate Actions

When fraud or suspected fraud is identified:

- Do not confront the suspect directly.
- Preserve evidence – do not alter, remove, or destroy any documents, files, or equipment.
- Report immediately to the Chief Financial Officer (or to the Chair of Governors where a report to the Chief Financial Officer is not appropriate).
- Maintain confidentiality, share information strictly on a need-to-know basis.

3. Reporting Lines

Initial Report: Staff must report suspicions directly to the Chief Financial Officer (or to the Chair of Governors where a report to the Chief Financial Officer is not appropriate).

- Escalation: The Chief Financial Officer must notify the Chair of Governors without delay.
- Governance: The Board of Governors must be informed of significant fraud incidents and updated on progress.
- External Notification: Where applicable, fraud may be reported to:
 - Police
 - External auditors
 - Regulators (e.g., Charity Commission, HMRC, Education bodies)

4. Investigation Procedure

Investigations will be conducted in accordance with legal requirements, School policies, and the principles of fairness and proportionality.

4.1 Planning

- Appoint an investigating officer or external specialist if required.
- Define scope, objectives, and timescales of investigation.
- Ensure no conflict of interest.

4.2 Evidence Gathering

- Secure all relevant documents, financial records, and electronic data.
- Record chain of custody for all evidence.
- Conduct interviews with relevant staff, with HR oversight.

4.3 Findings & Reporting

- Prepare a written report summarising findings, evidence, and conclusions.
- Recommend actions, including recovery of losses, disciplinary measures, and process improvements.

5. Disciplinary and Legal Action

- If fraud is proven, disciplinary action will be taken in accordance with the School's Disciplinary Policy and Procedure.
- Where appropriate, the case will be referred to the police for criminal investigation.
- Civil action may be taken to recover losses.
- Contracts with external third parties found to be complicit in fraud may be terminated.

6. Communication and Confidentiality

- Information will be restricted to those directly involved in the investigation.
- All media or external communications will be managed by the Head (or delegated officer) in consultation with the Board.
- Whistleblowers will be protected under the Whistleblowing Policy.

7. Recovery of Losses

- Alleen's School will seek to recover any losses arising from fraud, using all available avenues (insurance claims, civil recovery, restitution, or salary deductions where legally permissible).

8. Lessons Learned and Prevention

- Following each fraud case, a "lessons learned" review will be conducted.

- Outcomes will be shared with the Senior Executive Team and Governors.
- Internal controls and staff training will be updated accordingly.

9. Roles and Responsibilities

- Board of Governors: Oversight, review, and sanctioning of response actions.
- Head and Senior Executive Team: Lead investigations, notify external authorities, implement controls.
- Investigating Officer: Gather evidence, conduct interviews, prepare findings.
- All Staff: Report suspicions, cooperate fully with investigations.

10. Record Keeping

- All fraud allegations, investigations, and outcomes will be recorded in a confidential register maintained by the Chief Financial Officer.
- Records will be retained in line with legal and regulatory requirements.