



Partnership London SCITT

Anti-Fraud and Anti-Bribery Policy

Introduction

Partnership London SCITT is determined that the culture and tone of the SCITT meets the expectations of the Committee on Standards of Public Life and the Standards Board for England. It is committed to the ten principles of public life: objectivity, openness, stewardship, leadership, accountability, honesty & integrity, selflessness, personal judgement, the duty to uphold the law and respect for others.

PLS is committed to the highest standards of ethical conduct in its activities by ensuring that the affairs of the SCITT are conducted in accordance with the highest standards of probity and accountability

To this end, the SCITT has a framework of written procedures and controls that sets out best practice and aims to reduce the risk of fraud and bribery. In addition to this policy, these include:

- Financial Policy and scheme of deregulation
- Code of Conduct (Including Whistle Blowing)
- Risk Management

The purpose of this policy is to:

- Promote the prevention of fraud and bribery;
- Help people to detect fraud and bribery;
- Explain the procedures for investigating suspected cases; and
- Explain what we will do if we identify cases of fraud and bribery.

Scope of this policy

This policy applies to all employees, volunteers, committee members, temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the SCITT. PLS expects all staff and other representatives of the SCITT to demonstrate the highest standards of honesty and integrity in the discharge of their functions. All members of staff and other representatives of the SCITT are required to familiarise themselves with this Policy and are required to report any occurrence, or suspected occurrence, of fraud and bribery (see Reporting and Investigation section below for further details).

Definitions

For the purposes of this policy, the following meanings apply:

Fraud

The intentional distortion of financial statements or other records by persons internal or external to the organisation which is carried out to conceal the misappropriation of assets or otherwise for gain.

Fraud may involve:

- Falsification or alteration of accounting records or other documents
- Suppression or omission of the effects of transactions from records or documents



- Recording transactions which have no substance
- Wilful misrepresentation of transactions or of PLS's state of affairs

Bribery

The Bribery Act 2010 defines bribery as the offer or acceptance of a reward to persuade someone to act dishonestly and/or in breach of the law. Under the Act, a bribe is also defined as a financial or other type of advantage that is offered or requested with the:

- Intention of inducing or rewarding improper performance of a function or activity; or
- Knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A criminal offence will be committed under the Bribery Act 2010 if:

- an employee or associated person acting for, or on behalf of, the SCITT offers, promises, gives, requests, receives or agrees to receive bribes

Theft

The dishonest taking of property belonging to another person with the intention of permanently depriving the owner of its possession'.

Fraud

Indicators of fraud can be behavioural, financial or organisational. While it is important to recognise that any of the following behaviours, in isolation, are unlikely to be indicators of fraud, combined with other concerns they may present useful warning signs:

Behavioural indicators

- Increased stress for no obvious reason.
- Hesitancy, avoidance or confrontation when asked direct questions.
- Secretive or economical with the truth.
- Personal problems, including financial problems, alluded to but not shared.
- Reluctance to take holiday entitlement
- Constant complaints about the person from others.
- Person works late for no obvious reason.
- Lifestyle not equal to income.

Financial and organisational indicators

- Late or poorly presented accounts.
- Accounts and documents not circulated in advance.
- Accounts that do not balance.
- Financial inaccuracies that cannot be explained clearly.
- Poor records and minutes.
- Lack of openness and transparency, key decisions taken outside meetings.
- Poor forward planning.
- Final demands and 'red letters' received by the school.



Bribery

What is prohibited?

PLS prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or organisation. The bribe might be made to ensure that a person or the SCITT improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for the organisation in either obtaining or maintaining school business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors or other third parties.

Records

Employees and, where applicable, associated persons, are required to take particular care to ensure that the PLS Register of Business Interests is accurately maintained in relation to any contracts or business activities.

Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative. Employees and associated persons are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered by use of the 'Gifts and Hospitality Register' – see Appendix 1.

Corporate entertainment, gifts, hospitality and promotional expenditure

The SCITT permits corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken:

- For the purpose of establishing or maintaining good business relationships;
- To improve the image and reputation of the SCITT; or
- To present the SCITT's services effectively;

Provided that it is:

- Arranged in good faith, and
- Not offered, promised or accepted to secure an advantage for the SCITT or any of its employees or associated persons or to influence the impartiality of the recipient.

The SCITT will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure, as set out in its agreed fees and charges for each year.

Procedure

Employees and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure to the Finance Officer.

Employees are required to note



- The objective of the proposed client entertainment or expenditure;
- The identity of those who will be attending;
- The organisation that they represent; and
- The details and rationale of the proposed activity.

The SCITT will approve business entertainment expenditure proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. The SCITT will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence or a particular business benefit was being sought (for example, prior to a tendering exercise).

If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior written approval from the Co-Directors is required, together with details of the intended recipients, reasons for the gift and business objective.

Receipt of corporate entertainment, gifts and hospitality

Any gift or element of hospitality received above the value of £25¹ should be declared. Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers or other business contacts should be reported immediately to the Finance Manager. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers, chocolates or a bottle of wine, may be retained by employees.

In all cases (whether gifts and hospitality are given or received) employees and, where applicable, associated persons must supply records and receipts, in accordance with the school's financial procedures.

Charitable donations

If the SCITT makes charitable donations it will in all cases ensure that any organisation concerned can produce satisfactory evidence of charitable status.

Reporting and Investigating Fraud and Bribery

Anyone who has reasonable grounds to believe that an act of fraud or bribery has happened or is likely to happen must report it. As long as the disclosure is made in good faith, it does not matter if the person making the disclosure is mistaken².

¹ This limit does not apply to collections by parents for teacher's gift or tokens of appreciation. In such circumstances, any gift or token of appreciation where the total value exceeds more than £25 **per contributor** must be declared.

² However, any deliberate false or malicious accusations of fraudulent activity or bribery may result in disciplinary or other appropriate action.



The Management Board will investigate any allegations of fraud or bribery. Any suspicion of fraud or bribery should be reported to a member of the Senior Management Team. If it is considered more appropriate (for example, if a member of the Senior Management Team is implicated) the suspicions may be reported directly to the Management Board. Alternatively, any concerns may be reported by following the procedures set out in PLS's Whistleblowing policy.

Following a report, the Senior Management Team member will make any initial enquiries considered necessary to validate the report. In every case and as soon as possible after this initial investigation, he or she will pass the matter to the Chair of the Management Board.

Where there is a suggestion that an act of fraud or bribery had occurred, the Chair of the Management Board will set up an investigation panel. A designated panel member will collect all available evidence and present the findings to the panel. When fraud or bribery is identified, the panel will take action to:

- Limit the damage;
- If appropriate, seek reparation for losses incurred;
- Take appropriate action against the perpetrators; and
- If necessary, revise procedures to prevent any recurrence.

The SCITT will fully investigate any instances of alleged or suspected bribery or fraud. Employees suspected of bribery or fraudulent activity may be suspended from their duties while the investigation is being carried out. The SCITT will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. The SCITT may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, the SCITT who are found to have breached this policy.

In all cases (whether or not an act of fraud or bribery has occurred) the matter will be reported to the management Board with details of, and reasons for, the outcome.

The SCITT may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police. The SCITT will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

Review of procedures

The Finance Director will monitor and review the implementation of this policy and related procedures on a regular basis, including reviews of internal financial systems, expenses, corporate hospitality and giving or receiving of gifts.

The SCITT reserves the right to amend and update this policy as required. For the avoidance of doubt, this policy does not form part of employees' contracts of employment.

