

Aylesford School

and Sixth Form College



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ANTI-CORRUPTION POLICY

Written/updated: October 2019
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Lead: Finance Manager
Via: Finance and Premises

'from potential to reality'

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A charitable company registered in England and Wales, company number 7848367
Headteacher: Steven Hall BSc MA

Anti-Corruption Policy

This policy must be read in conjunction with the following policies; Whistle Blowing, Financial Procedure Manual, Financial Responsibilities and Schemes of Delegation and Gifts and Hospitality Policy. Reference should also be made at all times to the EFA 'Academies Financial Handbook 2019.'

Context

Whether small or large we recognise that:-

- schools are complex organisations and
- we have an unequivocal commitment to discharge, effectively, our responsibility to safeguard public and private funds. This is a pre-requisite for demonstrating the highest standards of integrity

Consequently the Governing Body, in consultation with the Headteacher and Senior Leaders, has agreed proportionate procedures to prevent and detect fraud and corruption. To this end we are intent on creating, embedding, developing and maintaining an anti-fraud and anti-corruption culture across all aspects of the school's activity.

This culture will support an ethos for:-

- Deterring corruption, fraud and bribery
- Preventing corruption, fraud and bribery that cannot be deterred
- Detecting corruption, fraud and bribery that cannot be prevented

We aim to create a framework for:-

- Investigating and facilitating recovery of losses
- Invoking staff disciplinary proceedings
- Applying sanctions against people who commit fraud or bribery offences including referral to the police
- Seeking redress for fraud, overpayment and losses
- Monitoring, publishing and updating our policy and procedures
- Evaluating the impact of policy and procedures on performance

NB: The showing of appreciation to staff through small gifts from parents and students is not affected by this policy since such gifts are not, in any way, a bribe.

School Strategy

- The Headteacher will identify a Lead Professional to take day-to-day responsibility for the oversight of the school anti-corruption policy (ACP). S/he will implement and enforce the school's anti-corruption policy.
- S/he will carry out a risk assessment covering bribery/corruption risks across the academy operating procedures (see also Academy Risk Register)
- S/he will provide advice, support and/or training on what is acceptable and what is not acceptable in terms of gifts, hospitality and acceptance of donations. S/he will maintain a register of gifts and donations received by the school/members of staff above an annually agreed threshold of £30.00.
- S/he will provide advice to appropriate school staff before contracting with or providing benefits to donors.

- S/he will ensure no gifts are provided for public officials, elected officials or private professionals /consultants.
- S/he will ensure due diligence is carried out on potential business partners or contractors before the academy enters into any business relationship or project.
- S/he will advise on financial/business links with parents.
- S/he will actively support leadership and governance in communicating zero tolerance of bribery and/or corruption.
- S/he will encourage and enable all staff to raise serious concerns.
- S/he will report regularly to the Head Teacher on the efficacy of school arrangements and annually to the Governing Body.

School Practice

To ensure all our practices are beyond reproach we require all staff members to support and cooperate with the Lead Professional responsible for our Anti- Corruption Policy (ACP).

We expect and encourage all staff members to raise any concerns they may have relating to fraud and corruption. Care, however, must always be taken to ensure such concerns are raised in good faith. In the first instance concerns can be raised with the individual's Line Manager or the Lead Professional ACP or directly with School Leadership or the Chair of Governors. The attention of all staff is drawn to our Whistle Blowing Policy.

All staff members are required to conform to guidance in the Gifts and Hospitality Policy which details what is acceptable and what is not acceptable in terms of gifts, hospitality and acceptance of donations. All staff members are required to be aware of the limit above which gifts and donations received by the school/members of staff must be declared and recorded.

All staff dealing with finance must undertake training to ensure the highest standards of accounting are maintained.

All staff involved in recruitment and appointment must adhere to the school's rigorous recruitment procedures.

School Community

This policy does not attempt to cover every aspect of theft, fraud corruption and bribery. It is intended to promote a framework whereby all members of the school community may work constructively together for the good of the school and all who work and learn here.

This policy will be reviewed at least annually and contributions from all categories of staff will be sought and welcomed. The most important aspect of our policy and practice is to demonstrate the highest standards of integrity in all we do.