

NORTHERN EDUCATION TRUST

ANTI FRAUD, CORRUPTION and BRIBERY POLICY

Approved: ARC November 2015

**ANTI FRAUD AND CORRUPTION POLICY NORTHERN
EDUCATION TRUST ACADEMIES**

This policy is applicable to all employees of Northern Education Trust (NET). The specific arrangements which the Trust expects to be in place to effectively deliver the Policy's aims are outlined in the Trust Financial Regulations.

The NET Academies have an important part to play as part of the implementation of the Policy. The adoption of a Anti Fraud and Corruption Policy by each Academy and the maintenance of effective arrangements within Academies in this area will help to ensure the Academy maintains high standards and an anti fraud culture, ensures that the Academy's policy reflects current good practice and remains fit for purpose, and provides a clear message as to its attitude toward fraud, corruption and other impropriety which is consistent with that of the rest of the Trust.

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Background

Northern Education Trust (NET) maintains high standards of probity and has a good reputation for protecting public monies. Our Academies and their Governing Bodies share these high standards and reputation and is committed to protecting the public funds entrusted to it so that the maximum amount of resources can be used for their intended purpose.

As part of the Trust's commitment to protecting public funds, and to make the most efficient and effective use of the resources it is responsible for, it is essential that the risk to the Trust and the Academies of financial losses due to fraud, corruption and financial impropriety are minimised.

Commitment

NET is committed to ensuring that the citizens of the United Kingdom have complete confidence that the affairs of the NET Academies are conducted in accordance with the highest standards of probity and accountability. As part of this commitment the Trust and Governing Body is committed to combating fraud, corruption and other financial impropriety (e.g. theft) wherever it may arise in relation to any of the Academy's activities or services and, in achieving this aim, realises this involves any Governor or Academy appointed worker, central NET employee or member of the public or any other third party associated with the Academy's activities.

Standards

NET expects Academies, their Governors and appointed workers to demonstrate the highest standards of honesty, probity, openness and integrity in the discharge of their functions. This includes:

- compliance with appropriate legislation, Codes of Conduct, Scheme of Delegation, Conditions of Service, standards of appropriate professional bodies, and any other standards, guidelines or instructions which are relevant to the particular service or activity,
- providing a framework within which counter fraud arrangements will flourish, and
- promoting an anti fraud and corruption culture within the Academies

Likewise the Academies and their Governing Bodies expect that all external individuals and organisations that they deal with, e.g. suppliers, contractors, partners, service providers, parents and members of the public etc., will act with honesty and integrity and without thought or actions involving fraud, corruption or financial impropriety. In such relationships the principles outlined in this Policy must be applied. Where external third parties become aware of any fraud and corruption they should report their concerns promptly to the Trust.

Implementation

NET is committed to establishing and maintaining effective arrangements to prevent fraud, corruption and financial impropriety. NET recognises, however, that these cannot always be prevented and so effective arrangements have been established to detect, report and investigate all incidents or situations where they are suspected.

NET is committed to creating and maintaining an anti fraud and corruption culture which promotes the highest standards of conduct and which enables Governors, Academy appointed workers and other external parties to express concerns and suspicions without fear of repercussion or intimidation and in the knowledge that the information will be treated confidentially and will be investigated fully and rigorously. This includes established reporting arrangements through the Trust's Whistle-blowing Policy.

NET will not tolerate dishonesty on the part of any Governor, Academy appointed worker or any person or organisation involved in any way with the Academy. Where fraud or corruption is detected the Academy and Trust will rigorously pursue appropriate action against the persons concerned including legal and/or disciplinary action, and wherever possible and deemed appropriate, will take action to recover any losses suffered.

NET and their Academies are committed to working constructively with the police and other relevant agencies in relation to combating fraud, corruption and financial impropriety within the Academies or within the wider Trust.

Bribery

The Bribery Act 2010 allows prosecutors to respond more effectively to the following offences:

- To make or receive a bribe
- Bribery of a foreign public official
- Corporate offence of failing to prevent bribery

Bribery is defined as: the offering, promising, giving, accepting or soliciting of money, gifts or other advantage as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organisation's activities.

NET principles supporting the Bribery Act;

- NET commits to a policy of zero-tolerance of bribery in any form.
- NET will implement policies to counter bribery, including:

1. High-level commitment

The Board of Trustees and senior management should commit to and oversee the implementation of a policy of zero-tolerance, recognising that bribery is contrary to fundamental values of integrity, transparency and accountability and undermines organisational effectiveness.

2. Risk assessment

Bribery risk assessment should form part of each organisation's overall and ongoing risk management process.

3. Devise and implement robust anti-bribery procedures

Organisations should devise, implement and maintain robust procedures, which are proportionate to the risks and to the size, resources and complexity of the organisation.

A "financial advantage" could include corporate hospitality. The statutory guidance suggests that it will not amount to a bribe provided that the hospitality: has a legitimate business aim (including developing relationships) is reasonable, proportionate and appropriate in the circumstances (including with reference to what is normal in the particular industry).

4. Due-diligence assessment of partners, agents and contractors

Assess the bribery risk associated with entering into partnership or contracting arrangements with other entities and then carry out periodic due diligence based on that risk assessment. Partnership or contractual arrangements should check that these organisations have policies and procedures which are consistent with these Principles and Guidance.

5. Dissemination and communication

To establish effective internal and external communication of its policy and procedures. NET will undertake training and awareness programmes to ensure staff, agents and partners are aware of the potential risks, how bribery might affect them, what they should do if they are offered a bribe, and the consequences should they be found to have made or received a bribe.

6. Monitoring and evaluation

Implementation of anti-bribery procedures should be monitored as part of overall risk management and internal control processes. Periodic reviews of anti-bribery procedures should be made and reported as part of governance and accountability processes.

7. Collective action

The organisation should commit to sharing information and strengthening collective action to prevent bribery.