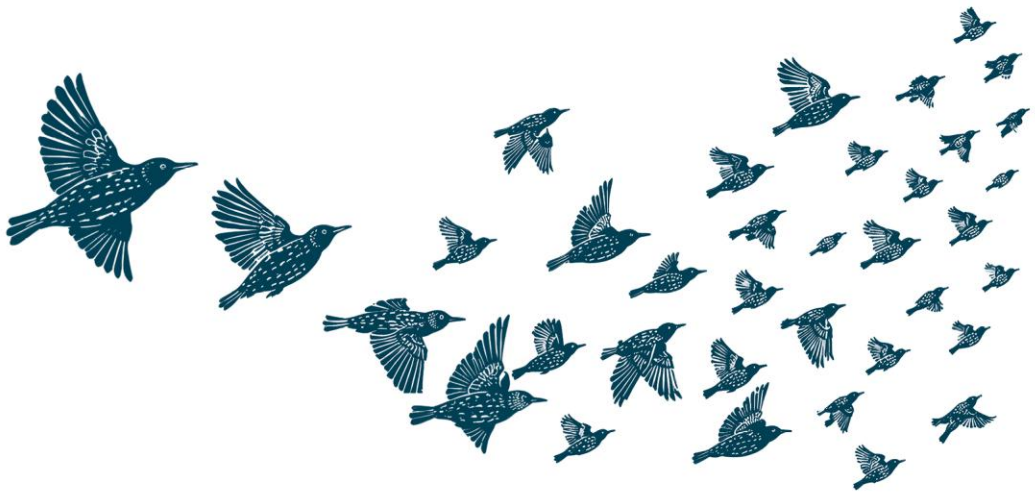
TPAT
Truro and Penwith Academy Trust

Anti-Fraud and Corruption Policy

Review Summary

Approved By:	**Trustees**
Approval Date:	**September 2026**
Next Review Date:	**September 2029**



ANTI-FRAUD AND CORRUPTION POLICY

1. Introduction

1.1 One of the basic principles of public service organisations is the proper use of public funds. It is vital, therefore, that all those working or otherwise involved in the public sector are aware of the risks of and means of enforcing the rules against wrongdoing. This document sets out the Trust's policy in relation to fraud and corruption.

1.2 The Trust already has procedures in place to reduce the likelihood of illegal acts occurring. These include financial regulations and procedures; a Code of Conduct for Governance individuals; a register of financial interests for Governance individuals; and systems of internal control and compliance auditing.

1.3 This policy is intended to provide advice and direction and help staff, managers and those undertaking governance roles who may find themselves having to deal with suspected cases of theft, fraud or corruption.

2. Basic Requirements

2.1 As part of all public sector activity, everyone is expected at all times to observe the fundamental precepts of the Seven Principles of Public Life:-

a. Selflessness

Holders of public office should act solely in terms of the public interest.

b. Integrity

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

c. Objectivity

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

d. Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

e. Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

f. Honesty

Holders of public office should be truthful.

g. Leadership

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

3. The Trust's Policy

3.1 The Board of Trustees is totally committed to maintaining an honest, open and well intentioned atmosphere within the Trust. It is equally committed to the elimination of any wrongdoing within the Trust, and to the rigorous investigation and punishment of any such cases.

3.2 For purposes of clarity, fraud is taken to mean the intentional distortion of financial statements or other records by persons internal or external to the Trust which is carried out to conceal the misappropriation of assets or otherwise for gain or unfair advantage. Corruption covers the offering, giving, soliciting or acceptance of any inducement or reward which may influence the action of any person.

4. Awareness of Risks

4.1 It is vital that everyone involved is aware of the risks and the need for vigilance at all times.

4.2 The range of potential acts of wrongdoing are many and various, but would certainly include such instances as:

- theft of cash or cash equivalents (eg fraudulent conversion of cheques)
- theft of Trust property or wilful damage there to
- all frauds with potential for direct pecuniary loss to the Trust (eg submission of invalid travel claims, illicit use of Trust or other official stationery)
- all frauds involving inappropriate use of Trust property (including intellectual property) and resources (including time for which staff are being paid) for personal gain
- any examples of accepting inappropriate gifts or hospitality from a contractor, potential contractor, employee or any other person (see Section 8)
- any examples of failing to declare a direct pecuniary or otherwise conflicting interest in a contractor or potential contractor, or relationship with a potential employee
- any example of providing inappropriate gifts or hospitality in order to influence the actions of any third party in their relationship with the Trust

5. Staff Concerns

5.1 In the event of any member of staff becoming aware of an irregular occurrence, he or she should act in the knowledge that they are able to report the matter in confidence to their line manager, a member of the academy's senior leadership team or Headteacher. If this line of reporting is not considered appropriate in a particular case or the staff member feels the line manager has failed to take appropriate action, staff will be free to approach the Trust Chief Financial Officer or Chief Executive or, the Chair of Trustees.

5.2 Staff will be protected from any disciplinary action or other detriment in raising a genuine concern about fraud or corruption regardless of whether the subsequent investigation substantiates that concern.

6. Reporting of Incidents

6.1 Any line manager must pass on incidents reported to them by staff, from outside the Trust or following an initial investigation to the Trust Chief Financial Officer within one working day. In view of the important rules surrounding collection of evidence, line managers must on no account carry out detailed investigations themselves.

6.2 It is essential to remember that a separate Trust Complaints Procedure exists for 'service complaints' and to recognise which action route to take in specific cases.

7. Action

7.1 Following each reported incident, the Trust Chief Financial Officer will as necessary liaise with other senior managers, the Chair of the Audit and Risk Committee and Chair of the Board of Trustees. The Board of Trustees must notify DfE as soon as possible of all instances of fraud, theft or irregularity exceeding £5,000 individually, or £5,000 cumulatively in any financial year, and of any unusual fraud regardless of value. The Trust Chief Financial Officer will prepare the notification on the Board's behalf, after informing the Chair of Trustees and the Chair of the Audit and Risk Committee, setting out: full details of the events with dates; the financial value of the loss; measures taken to prevent recurrence; whether the matter was referred to the police (and if not, why); and whether insurance or the RPA has offset any loss. DfE may conduct or commission its own investigation.

7.2 Details of the investigating procedure will be notified separately which may involve the participation of the internal audit service or police intervention.

8. Declaration of Gifts and Hospitality

8.1 Gifts and hospitality must be declared and recorded in accordance with the Trust's Gifts and Hospitality Policy, which sets the declaration thresholds and maintains the register.