



**W A T E R T O N**  
ACADEMY TRUST®



# Anti-Fraud & Bribery Policy 2018-2020

**Reviewed: November 2018**  
**Next Review: November 2020**

## 1. Introduction

Waterton Academy Trust and each of its member academies:

- 1.1 require its staff and any other persons acting on its behalf, at all times to act honestly and with integrity and to safeguard the resources for which they are responsible.
- 1.2 is committed to ensuring that business is conducted in an open and transparent manner and will take all appropriate steps to address the risks of fraud and bribery (including theft).
- 1.3 condemns all acts of bribery or fraudulent behaviour and any cases identified or brought to its attention will be investigated exhaustively and dealt with appropriately.
- 1.4 is committed to the highest standards of integrity and to ensuring it adheres to and promotes best practice in fraud and bribery prevention.

## 2. Definitions & Scope

- 2.1 **Fraud** is 'the intentional distortion of the financial statements or other records by persons internal or external to the organisation, which is carried out to obtain an advantage, avoid an obligation or cause loss to another party

Fraud is therefore a deliberate, dishonest act by an individual or group of people, which can be committed, as per The Fraud Act 2006, by:

- False representation
- Failing to disclose information
- Abuse of position

- 2.2 **Bribery** is offering, promising or giving someone a financial or other advantage to induce or reward that person to perform their functions or activities improperly as per the Bribery Act 2010, which came into force 1<sup>st</sup> July 2011. It is also an offence to request, receive or accept a bribe.

The Bribery Act 2010 also introduces a corporate offence of failing to prevent bribery, which requires adequate procedures to be in place and appropriately supported from the very top of the organisation.

- 2.3 **Theft** is the dishonest appropriation of property belonging to another with the intention of permanently depriving the other of it.
- 2.4 The above definitions cover such as acts as deception, forgery, extortion, blackmail, conspiracy, collusion, embezzlement, false accounting / false representation,

concealment of material facts, the offering of a gift or reward to influence a person's actions and misappropriation.

**2.5** Good Corporate Governance requires that Waterton Academy Trust and each member academy is firmly committed to dealing with fraud and bribery and will deal equally with perpetrators from inside and outside the organisation. To this end there will be no distinction made, regarding investigation, between cases that generate financial benefits and those that do not. All cases will be viewed seriously and following investigation the action taken will be in line with the merits of each case and in accordance with other procedures and obligations applicable to the organisation.

**2.6** The CEO, Trustees and Headteachers in conjunction with local governance will:

- Adopt and adhere to this Anti-Fraud & Bribery Policy;
- Ensure that its staff and those that represent the Trust are aware of and adhere to this policy;
- Work at the highest level to adopt and adhere to the six principles of bribery outlined in the Ministry of Justice Bribery Act 2010.

The CEO/Headteacher has lead responsibility for policy implementation within Waterton Academy Trust/each academy.

(Signed) \_\_\_\_\_ Dated \_\_\_\_\_ (CEO)

(Signed) \_\_\_\_\_ Dated \_\_\_\_\_  
(Director)