D'OVERBROECK'S
OXFORD
A NORD ANGLIA EDUCATION SCHOOL

ANTI-FRAUD POLICY

Last reviewed:	October 2026
Next review due:	October 2027
Reviewed by:	Head of Finance

1. Introduction

The school is committed to the prevention of fraud and the promotion of an anti-fraud culture. We operate a zero-tolerance attitude to fraud and require staff to act honestly and with integrity at all times, and to report all reasonable suspicions of fraud.

Fraud may occur internally or externally and may be perpetrated by staff, consultants, suppliers or contractors, individually or in collusion with others.

We will investigate all instances of actual, attempted and suspected fraud committed by staff, consultants, suppliers and other third parties and will seek to recover funds and assets lost through fraud. Perpetrators will be subject to disciplinary and/or legal action.

The purpose of this policy is to set out responsibilities with regard to fraud prevention, what to do if fraud is suspected and the action that will be taken by management.

This policy is endorsed and supported by the Principal.

2. Who is covered by the policy?

This policy applies to all individuals working for the school at all levels (whether permanent, fixed-term or temporary), and includes governors, volunteers, agents or any other person associated with us (collectively referred to as 'staff' in this policy).

3. Definition of fraud

The term 'fraud' is commonly used to describe the use of deception to deprive, disadvantage or cause loss to another person or party. This can include theft, the misuse of funds or other resources or more complicated crimes such as false accounting and the supply of false information.

Individuals can be prosecuted under the Fraud Act 2006 if they make a false representation, fail to disclose information or abuse their position.

The school has established procedures to encourage staff to report actual, attempted or suspected fraud and/or other forms of illegal activity without fear of reprisal.

4. Key responsibilities

4.1 The **Head of Finance** is responsible for:

- developing, implementing and maintaining adequate systems of internal control to prevent and detect fraud;
- investigating all allegations of fraud and commencing disciplinary and/or legal action where appropriate;
- reporting to the Principal on all aspects of fraud risk management.

4.2 **Heads of Department and Senior Staff** are responsible for:

- familiarising themselves with the types of fraud and dishonesty that might occur within their departments or areas of work;
- monitoring compliance with internal controls and agreed policies and procedures;
- notifying the Head of Finance of any indications of fraudulent activity.

4.3 **All Staff** are responsible for:

- ensuring that the school's reputation and assets are protected against fraud;
- reporting known or suspected fraud;
- assisting in the investigation of suspected fraud.

5. Reporting suspicions

Staff must report concerns about actual, attempted or suspected fraud to their line manager or the Head of Finance. Staff should not attempt to investigate any fraud themselves.

The school supports Whistleblowing as part of its policy for 'Safeguarding and Promoting the Welfare of Children', and the same principles apply to reporting suspicions of fraud, namely:

> 'It cannot be overemphasised that such concerns must be reported at once; nobody who reports a genuine concern in good faith needs to fear retribution. A member of staff … reporting a … concern will suffer no adverse consequences, regardless of the status of the person against whom the allegation was made and of whether the allegation or concerns prove founded over time, provided the report was made in good faith.'

The Public Interest Disclosure Act 1998 (PIDA) protects employees who raise concerns about certain matters of public interest in good faith. Staff can obtain free independent advice from the charity Protect on 020 3117 2520.

All instances of fraud will be reported by the Head of Finance and/or Principal to Nord Anglia's Chief Financial Officer.

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Associated policies

Policies available from the school website:

- Anti-money laundering policy
- Anti-bribery and corruption policy
- Whistle blowers protection policy (Nord Anglia Education policy)

School policy available to staff from the school SharePoint:

- Grievance & disciplinary policy

Nord Anglia Education policies available to staff from the Nord Anglia SharePoint:

- Anti-corruption & bribery policy
- Anti-fraud policy