

ANTI FRAUD & ANTI-BRIBERY POLICY

Responsible	Chief Finance Officer
Approved by	Board of Trustees
Approval date	December 2025
Date for review	December 2028

ANTI-FRAUD & ANTI-BRIBERY POLICY

Purpose

To confirm Better Futures Multi Academy Trust's commitment against fraud and bribery.

To clearly define the terms fraud, bribery and corruption and to set out the MAT's stance and culture around them.

The Policy

1. Introduction

- 1.1. A basic principle of a public sector organisation is proper use of public funds. It is important that all those who work in the public sector are aware of the risk and the means of enforcing the rules against fraud and other illegal acts involving dishonesty or damage to property.
- 1.2. BFMAT has robust procedures in place to reduce the likelihood of fraud occurring. These are outlined in the Scheme of Delegation and the Financial Regulations.
- 1.3. BFMAT clearly recognises that any abuse of resources, assets and services will undermine the MAT's reputation and threaten member academies financial standing.

2. Public Sector Values

BFMAT recognises and embraces the seven principles of public life defined by the Nolan Committee 1995:

- Selflessness
- Integrity
- Objectivity
- Accountability
- Openness
- Honesty
- Leadership

all trustees, employees and those acting as its agents to be aware of, and act in accordance with, these values.

Through observance of these principles, BFMAT requires all to be alert to the possibility of fraud, corruption and dishonesty in all their dealings.

BFMAT requires that those employees responsible for its systems and procedures should design and operate systems and procedures which endeavour to minimise losses due to fraud, corruption and any other dishonest action or abuse.

3. Definitions

3.1. Fraud

- 3.1.1. Fraud is a range of abuse and malpractice that is covered by the Fraud Act 2006. Fraud can be defined as an abuse of knowledge or financial position that is done deliberately to create a financial gain for the perpetrator or for a related person or entity and/or cause a loss to another. It can take place in many ways, withholding information, deliberately misleading, misrepresenting a situation to

others or by abuse of position. Irrespective of the definition applied, fraud is always deceitful, immoral and intentional and creates a financial gain for one party and/or a loss for another.

3.1.2. Gains and losses do not have to be direct. A gain to a related party or company through intentional abuse of position, albeit not directly to the officer involved is still fraudulent. In the same way, using BFMAT's name to procure personal goods and services is also fraudulent.

3.1.3. Under the Economic Crime and Corporate Transparency Act 2023, large organisations may be criminally liable if they fail to prevent fraud committed by employees or associated persons intended to benefit the organisation. The Act establishes best practice expectations for fraud prevention and internal controls and BFMAT will adopt these standards as part of its governance and assurance framework.

3.2. Corruption

3.2.1. Corruption will normally involve the above with some bribe, threat or reward being involved. It includes any action where an individual improperly uses their position to influence a decision or secure an advantage.

3.3. Bribery

3.3.1. The Bribery Act 2010 states that there are 4 key offences:

- The bribery of another person.
- Accepting a Bribe.
- Bribing a foreign official.
- Failing to prevent bribery.

3.3.2. Bribery may take the following forms:

- give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy;

3.4. Gifts and hospitality

3.4.1. This policy does not change BFMAT's approach to gifts and hospitality as defined in the Financial Regulations (section 13.3).

4. Culture and Stance

- 4.1. BFMAT is determined to foster a culture of honesty and openness, opposing fraud and corruption of any kind.
- 4.2. BFMAT expects that trustees, governors and employees at all levels will lead by example in ensuring adherence to legal requirements, financial rules, codes of conduct and prescribed procedures and practices.
- 4.3. BFMAT implements and maintains systems of accountability and control to ensure that its resources are properly applied in the way it intended. These systems include robust internal controls to detect significant errors but also importantly, fraud and corruption.

5. Raising Concerns

- 5.1. Trustees, governors and staff at all levels all play an important role in defending BFMAT against fraud and corruption. They are expected to raise any concerns they may have on these issues, as soon as is practicably possible
- 5.2. The guidance issued in the Whistleblowing Policy should be used in determining the correct course of action and the point of contact.
- 5.3. The Board of Trustees or their representative will notify DfE, as soon as possible, of any instances of fraud, theft and/or irregularity exceeding £5,000 individually, or £5,000 cumulatively in any financial year. Unusual or systematic fraud, regardless of value, will also be reported. The following information will be reported:
 - full details of the event(s) with dates
 - the financial value of the loss
 - measures taken to prevent recurrence
 - whether it was referred to the police (and if not why)
 - whether insurance or the RPA have offset any loss.