

# The American School in London

## Anti-Fraud Policy

*The current version of any policy, procedure, protocol or guideline is the version posted on the ASL website. It is the responsibility of all employees to ensure that they are following the most up-to-date version.*

<b>Responsible party</b>	Director of Finance
<b>Approved by</b>	Board of Trustees
<b>Approval date</b>	May 2023
<b>Next review date</b>	May 2024

### Introduction

The School is committed to the prevention of fraud and the promotion of an anti-fraud culture. It operates a zero-tolerance attitude to fraud and requires employees 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 employees, consultants, suppliers or contractors, individually or in collusion with others.

The School will investigate all instances of actual, attempted and suspected fraud committed by employees, 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 employee responsibilities with regard to fraud prevention, what to do if fraud is suspected and the action that will be taken by management.

### 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 trustees, volunteers, agents and any other person associated with the School.

### 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 may be reported to the police and can be prosecuted under the Fraud Act 2006 if they make a false representation, fail to disclose information or abuse their position with the intent to cause loss to another person or party.

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

### **Key responsibilities**

The Director of Finance is responsible for:

- Developing, implementing and maintaining adequate systems of internal control to prevent and detect fraud.
- Regularly reviewing the school's anti-fraud policy and compliance to ensure it remains effective and relevant to the needs of the business.
- Working with the human resources director to investigate all allegations of fraud and commencing disciplinary and/or legal action where appropriate.

Managers are responsible for:

- Familiarizing 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 Director of Finance of any indications of fraudulent activity.

Employees are responsible for:

- Ensuring that the school's reputation and assets are protected against fraud.
- Reporting known or suspected fraud to their line managers or to the Director of Finance.
- Assisting in the investigation of suspected fraud.

### **Reporting suspicions**

Employees should not attempt to investigate any fraud themselves. The Public Interest Disclosure Act 1998 protects employees who raise concerns about certain matters of public interest in good faith. Employees can obtain free independent advice from the Charity Protect, 020 3117 2520.

### **Reporting to the Charity Commission**

The Charity Commission has a very low threshold for reporting theft, fraud or money-laundering as a Serious Incident Report. A Serious Incident Report should be completed for "any actual/alleged fraud or money laundering." Employees need to remember, there is no minimum loss figure that should be reported on. The Commission gives the example of needing to report a case where "each month, between £100 and £200 goes missing, suspected stolen, from the cash till in the charity shop. [The theft] has been going on for six months and has been reported to the police." In this example, the theft to be reported is between £600 and £1,200.