AHMAT

Anti-Fraud & Corruption Policy

October 2025

Ashley Hill Multi Academy Trust

Encourage one another and build each other up
1Thessalonians 5:11

VISION STATEMENT FOR AHMAT

Ashley Hill Multi Academy Trust is committed to securing the best outcome for every child in its schools within a learning environment characterised by a distinctive Christian ethos.

We value the uniqueness and individuality of every school in the Trust, encouraging each to develop to meet the particular needs of all its pupils and the community it serves, underpinned by a common commitment to work together, making full use of all the Trust's resources, to enhance the experience and opportunities of all.

In line with our core Christian beliefs and principles, we want each school to be an educational community where:

- all are welcome, whatever their cultural, ethnic or religious background;
- all will flourish, with a particular focus on supporting any who are
- disadvantaged culturally, socially, economically, physically, or in any otherway;
- all will have a life-enhancing encounter with the Christian faith;
- each individual is encouraged and helped to discover and develop their God-
- given gifts and talents to the fullest extent;
- all will fulfil their potential in a way appropriate for their age, both
- academically and as well-rounded, independent, emotionally mature individuals.

Contents:

Statement of intent

This policy details the Trust's position on the prevention of fraud, bribery and corruption, and the promotion of an anti-fraud culture.

Ashley Hill Multi Academy is committed to upholding the highest ethical standards and acting with integrity in all business activities.

As such, we are opposed to corruption and seek to eliminate fraud by the way we conduct school business, the culture instilled in staff and the recruitment of trustworthy individuals.

To minimise the risk and impact of fraud and corruption, we aim to create a culture which deters fraudulent and corruptive activity, encourages its prevention and promotes its detection and reporting.

The purpose of this policy is to:

- Establish the responsibilities of the governing board and staff members in observing and upholding our position on fraud, bribery and corruption.
- Provide information and guidance to school staff on how to recognise and deal with concerns over fraudulent activity.
- Promote the early detection of fraudulent and corruptive behaviour.

This policy covers all individuals working for the Trust at all levels (whether permanent, fixed-term or temporary), and includes directors, governors, volunteers, agents and any other persons associated with the school.

1. Legal framework

This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:

- Public Interest Disclosure Act 1998
- Terrorism Act 2000
- Proceeds of Crime Act 2002
- Fraud Act 2006
- Companies Act 2006
- Bribery Act 2010
- Charities Act 2011
- DfE (2025) 'Reducing fraud in the education sector'
- DfE (2025) 'Academy trust handbook 2025' (ATH)

2. Definitions

Fraud is a criminal offence, which is defined by the Fraud Act 2006 as:

- Deceiving through false representation.
- Failing to disclose information where there is a legal duty to do so.
- Abusing a position of trust.

Other offences under the Fraud Act include the possession of, and the making or supplying of, articles for use in fraud. Articles would include lists of other people's credit card details or software used for producing blank utility bills or for generating credit card numbers.

Corruption is the offering, giving, soliciting or accepting of any inducement or reward which may influence the actions taken by the Trust, its members or officers. This is the abuse of entrusted power or position for private gain.

Theft is dishonestly appropriating property belonging to another with the intention of permanently depriving the other of it.

Bribery is defined as the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages.

Fraud can be committed in three ways according to the Fraud Act 2006:

- By false representation
- By failing to disclose information
- By abusing a position in which a person is expected to safeguard financial interests of another person

3. Roles and responsibilities

The Trust must take appropriate action where fraud, theft or irregularity is suspected or identified.

The Board of Directors will appoint, in writing, a senior executive leader, - CEO, who is appointed as a Director.

The Board of Directors will ensure that the senior executive leader is named as the appointed accounting officer. The roles of senior executive leader and accounting officer will not rotate.

Responsibilities of the accounting officer will include:

- Overseeing the development and implementation of a system of internal controls that aim to minimise the risk of fraud.
- Overseeing the financial transactions and the development and implementation of effective financial regulations, policies and procedures to prevent losses and misuse.

- Ensuring bank accounts, financial systems and financial records are operated by more than one person.
- Ensuring resources are being managed in an ethical, efficient and economical manner.
- Ensuring that rigorous investigations of potential fraud are carried out promptly.
- Ensuring the appropriate legal and/or disciplinary action is taken where fraud is proven.
- Ensuring that appropriate action is taken to recover assets and minimise loss.
- Keeping full and accurate accounting records and producing the trust's annual accounts, including a statement on regularity, propriety and compliance.
- Assuring the board of trustees that the trust is complying with the funding agreement and handbook.
- Assessing the areas of the trust that are most vulnerable to fraud, in conjunction with the Trust Business Manager.
- Receiving reports of fraud.
- Conducting an initial investigation where a report is made, in conjunction with the TBM.
- Approving gifts and hospitality in line with the AHMAT Financial Procedures 2025..
- Ensuring employees are provided with appropriate anti-fraud training.
- Advising the Board of Directors in writing if action it is considering is incompatible with the Articles of Association, funding agreement or ATH.
- Notifying the DfE if the board proceeds with action considered to be in breach of the above.

The external auditor will be responsible for certifying whether the Trust's annual accounts present a true and fair view of its financial performance and position.

The Board of Directors will appoint a chief financial officer (CFO) to whom responsibility for the Trust's detailed financial procedures is delegated. The Trust will not appoint the Trust Business Manager as the accounting officer.

The Trust BM will be responsible for:

- Assessing the areas of the tTust that are most vulnerable to fraud, in conjunction with the CEO and accounting officer.
- Conducting an initial investigation where a report of fraud is made, in conjunction with the CEO.
- Contacting the DfE to request prior approval for any transactions beyond the Trust's delegation limits, and transactions that are novel, contentious or repercussive.
- Maintaining the Conflicts of Interests Register and Gifts and Hospitality Register.

- Developing, implementing and maintaining adequate systems of internal control to prevent and detect fraud.
- Ensuring that all relevant staff are adequately trained on internal controls and procedures that need to be complied with.

- Implementing any changes to the internal controls and procedures that may have been identified as a result of a fraud or irregularity investigation, to prevent further instances of fraud or corruption.
- Informing the Accountable Officer or chair of the Directors, as appropriate, of any indications of fraudulent activity and alleged financial irregularities.
- Declaring to the Accountable Officer any business and personal interests, as well as any interests or offers of gifts or hospitality, which are in any way related to the performance of their duties in relation to the school.
- Reviewing this policy on an annual basis, in liaison with the Accountable Officer, ensuring that it remains adequate and appropriate for the needs of the individual schools and Trust.
- Maintaining an up-to-date gifts and hospitality register.
- Contacting the DFE to request prior approval for any transactions beyond the trust's delegation limits, and transactions that are novel, contentious or repercussive.

The chair of Directors will be responsible for:

- Receiving reports of fraud that involve the Head of School.
- Ensuring the DfE is notified as soon as possible in relation to instances of fraud, theft and irregularity exceeding £5,000 individually, or £5,000 cumulatively in any financial year. Unusual or systematic fraud, regardless of value, **must** also be reported.

The Board of Directors will appoint an audit and risk committee which will be responsible for overseeing and approving the Trust's programme of internal scrutiny, ensuring that risks are being addressed appropriately and conducting a full investigation of reports on the adequacy of the Trust's internal control framework and determining what the next steps will be.

The Board of Directors will identify and demonstrate sufficient financial knowledge to hold the Trust's executives to account.

All employees (including volunteers and temporary staff) and third parties that work with the trust will be responsible for:

- Demonstrating the highest standards of honesty, probity, openness and integrity in the discharge of their duties.
- Complying with the provisions outlined in this policy.
- Being vigilant to the risks and indicators of fraud.
- Promoting an ethical, anti-fraud culture.
- Reporting their concerns in relation to fraud to the Head of School or chair of Directors.
- Reporting any breach of this policy to the Head of School or accounting officer.
- Providing information about any conflicts of interest and direct or indirect pecuniary interests to the Head of School.
- Maintaining the academy trust's estate in a safe working condition.

Management accounts which set out the Trust's financial performance and position are prepared every month and shared with the chair of Directors every month. The trust board will consider management accounts when it meets.

Appropriate and timely action will be ensured by the board to maintain financial viability. Where the trust sees fit, it will amalgamate its General Annual Grant (GAG) from one central fund.

Where the trust sees fit, it will amalgamate its General Annual Grant (GAG) from one central fund. The trust will ensure that it considers the funding needs and allocations of each constituent academy and have an appeals mechanism.

4. Indicators for potential fraud

Some actions and behaviours may give cause for concern, arouse suspicion and possibly indicate fraudulent activity. These are outlined in appendix A. The list provided in appendix A is not exhaustive; fraud can take many different forms. All employees will be vigilant to the indicators of fraud.

Clarification will be sought from the CEO or TBM if there are any questions over whether something could be considered an indicator of fraud. The presence of any of these indicators may not be a cause for concern; however, they will always be investigated appropriately.

5. Creating an ethical culture

An ethical, anti-fraud culture will underpin all the work done by the Trust to counter fraud. All employees and third parties that work with the Trust will be expected to act with high levels of integrity and to adhere with the rules outlined in this policy.

Overarching anti-fraud awareness training will be held for all employees on an annual basis. Role-specific training will also be provided to employees with responsibility for the Trust's internal controls or financial procedures on a regular basis or when a procedure changes.

Employees will be encouraged to report any concerns, and clear reporting mechanisms will be implemented and communicated. Victimisation or harassment of anyone who has made a report will not be tolerated.

6. Preventing fraud and corruption

Fraud and corruption are minimised through effectively designed and consistently implemented management procedures which deny opportunities for fraud and corruption.

The **Accountable Officer** and **TBM** assess the areas of the Trust that are most vulnerable to fraud on a termly basis.

Fraud risks are identified for all areas and processes of the Trust and are assessed in terms of impact (including monetary and non-monetary) and the likelihood of occurrence.

Robust internal controls are in place to manage the risk of fraud, these cover the following areas:

- Approval and authorisation process of transactions
- Access restrictions and transaction controls
- Account reconciliations
- Physical security of assets
- Segregation of responsibilities
- Pre-employment checks
- Responsible Officer checks

Internal controls are reviewed on an annual basis by the **TBM** to ensure they remain effective and are being consistently applied.

Financial procedures and systems reflect the need for internal checks and internal controls. All employees that are involved in the implementation of these controls are provided with training.

Robust IT procedures are put in place, including restricting access to certain systems. Other steps taken towards ensuring IT security are outlined in section 12 of this policy.

All employees will follow the Staff Code of Conduct in the staff manual.

Recruitment is conducted in line with Safer Recruitment training undertaken by CEO and Heads of Schools and all new employees are required to declare any business or pecuniary interests, and any other conflicts of interest.

Following a case of fraud or irregularity, the risk management strategy is reviewed to ensure it considers all relevant risks and is effective.

7. Indicators of fraudulent activity

Some actions and behaviours may give cause for concern, arouse suspicion and possibly indicate fraudulent activity. A list of actions and behaviours that may give cause for concern, arouse suspicion and indicate possible fraud can be found in **Annex A** – any actions or behaviours in this list will be brought to the attention of the **TBM** and the individual in question will be closely monitored.

All staff are vigilant to the risks of fraud.

Clarification is sought from the **Accountable Officer or TBM** if there are any questions over whether a factor is considered an indicator of fraud.

The Trust recognises that the presence of any of these indicators may not be a cause for concern; however, they will always be investigated appropriately.

It is important to note that any one of these on its own may be perfectly innocent and a function of carrying out normal duties; however, a combination of the factors may give cause for concern.

8. Reporting and investigating suspected fraud

Concerns regarding fraudulent activity are reported to the Accountable Officer or, where there are concerns over the Accountable Officer the chair of the governing Directors.

Concerns can be raised in person, via email or telephone, or by using a Fraud Reporting Form.

Under no circumstances will staff investigate the matter themselves.

Any concerns are reported immediately in the knowledge that such concerns are treated in confidence and properly investigated.

If a member of staff wishes to report a fraud concern anonymously or wishes to seek advice about how to deal with an allegation of fraud, they should contact the LA LADO on Telephone: 01628 683194.

Procedures outlined in the Whistleblowing Policy are followed to report concerns where the normal reporting procedure is not appropriate. The Whistleblowing Policy can be found on the Trust and school's website or obtained from the school office. Employees who raise concerns in good faith are supported by the school and the school ensures that they are not subjected to any detrimental treatment as a consequence of their report. Any instances of detrimental treatment against an employee for reporting a suspicion are treated as disciplinary offences.

Claims are, in the first instance, investigated by the Accountable Officer to ascertain the basic facts. If the claim concerns the Accountable Officer the chair of the Directors ascertains the basic facts.

Subject to the findings, the matter is reported to the Board of Directors, which may result in a full internal investigation by the DFE.

Suspects are not made aware that they are under investigation until agreed by the Board of Directors.

No information concerning suspicions of fraud or corruption are reported to the press, media or any other third party. Such disclosures may damage the investigation and any subsequent actions to be taken.

The DFE anti-fraud team has full right of access to examine any necessary documents and the contents of school property, including the examination of computers and related equipment, as well as to undertake interviews with staff members.

The investigation process includes:

- Gauging the credibility of the allegation.
- Securing evidence and ensuring it is retained in the original format.
- Interviewing witnesses.
- Taking statements.
- Interviewing potential suspects.
- Liaising with the Accountable Officer and Board of Directors, as well as external agencies where necessary.

The anti-fraud team works closely with the Accountable Officer and Board of Directors in fraud related cases involving disciplinary investigation.

Cases of fraud are also reported to Action Fraud via their website or via their hotline: 0300 123 2040.

Where fraud is proven, this constitutes gross misconduct and cases are dealt with in accordance with the Trust's disciplinary procedures.

Where appropriate, the Trust refers cases to the police for them to consider taking criminal action.

The Trust will seek to apply appropriate criminal, civil and disciplinary sanctions to all cases of proven fraud and corruption.

9. Recovery of losses

Where practicable, the Trust seeks to recover any losses incurred as a result of fraud or corruption.

The Board of Directors is immediately informed of any potential loss and provided with details of the case and any recovery action being undertaken.

If an individual under investigation offers money in settlement of losses to the Trust, the monies are accepted without prejudice to any other action the Trust may wish to take.

Money will only be accepted in respect of losses to date and the Trust will reserve the right to seek the recovery of further losses that may come to light in the future.

The Trust will only claim under insurance arrangements once all other avenues of recovery have been exhausted.

10. Gifts and hospitality

It is not acceptable for employees to:

- Give, promise or offer a payment, gift or hospitality with the expectation or hope that an advantage for the Trust will be received, or to reward an advantage already received.
- Give, promise 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 if they know or suspect that it is offered with the expectation of a business advantage in return.
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns regarding bribery.

The Trust does not prohibit normal and appropriate hospitality or gifts (both given and received) if the following requirements are met:

- It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in exchange for favours or benefits
- It is given in the Trust's or one of it school's name, not an individual's name
- It complies with local law
- It does not include cash or a cash equivalent, e.g. vouchers or gift certificate
- It is appropriate in the circumstances, e.g. the giving of small gifts at Christmas time
- The type and value of the gift is reasonable given the reason the gift is offered
- It is given openly, not secretly
- Gifts should not be offered to, or accepted from, government officials or representatives without the prior approval of the Accountable Officer.

Gifts of a value of **£35** or less can be accepted from individual parents and pupils without approval from the Accountable Officer (providing that these gifts do not satisfy the conditions outlined above). These gifts do not need to be recorded in the Gifts and Hospitality Register.

Any gifts and hospitality given or received are recorded on the Gifts and Hospitality Register.

The advice of the Trust is to, in all circumstances, consider whether the gift or hospitality is reasonable and justified, and to consider the intention behind the gift.

11. Charitable donations

Charitable donations are part of the Trust's wider purpose. The Trust supports several carefully selected charities. The Trust and its schools may also support fundraising events involving employees. The Trust only makes charitable donations that are legal and ethical. No donation must be offered or made in the Trust/school's name without the prior approval of the **Accountable Officer**.

12. Reporting suspected bribery

Employees are encouraged to raise concerns about any suspicion of bribery or corruption at the earliest possible opportunity. Issues that should be reported include:

- Any suspected or actual attempts at bribery.
- Any concerns that an employee may be in receipt of bribes.
- Any concerns that an employee may be offering or delivering bribes.

All concerns should be reported following the procedure set out in the school's Whistleblowing Policy.

All reports of bribery are investigated thoroughly and in a timely manner by the Accountable Officer. in the strictest confidence. Employees are required to assist in any investigation into possible or suspected bribery.

Employees who raise concerns in good faith are supported by the Trust and the Trust ensures that they are not subjected to any detrimental treatment as a consequence of their report. Any detrimental treatment against an employee for reporting a suspicion is treated as a disciplinary offence.

The Trust invokes disciplinary procedures where any employee is found guilty of bribery, and this may result in a finding of gross misconduct and immediate dismissal. The Trust may terminate the contracts of any associated persons, including consultants or other workers acting for, or on behalf of the Trust, who are found to have breached this policy.

Where appropriate, the Trust refers cases to the police for them to consider taking criminal action.

The Trust seeks to apply appropriate criminal, civil and disciplinary sanctions to all cases of proven bribery.

13. Confidentiality

The Trust understands that the decision to report a concern can be a difficult one to make.

Victimisation or harassment of anyone who has made a report is never tolerated.

Where possible, the identity of the person who made the report is kept confidential – their identity is only shared on a need-to-know basis.

14. Cybercrime and cybersecurity

The trust will be vigilant to cyber-crime and clear cyber-security measures and proportionate controls will be implemented, as outlined in the Cyber-security Policy. Appropriate action will be taken where a cyber-security incident occurs, in line with the trust's Cyber Response and Recovery Plan.

The following measures will be implemented specifically relating to addressing the risk of fraud:

- Firewalls, anti-virus software and strong passwords will be used
- Data will be routinely and securely backed up
- A restricted number of devices will be used to access financial or other sensitive data

Staff receive training to ensure they:

- Check the sender of an email is genuine before, for example, sending payment, data or passwords.
- Make direct contact with the sender where an email requests a payment – this is done in person where possible, but at a minimum, staff must use another method other than the direct reply function.
- Understand the risks of using public Wi-Fi.
- Understand the risks of not following payment checks and measures.

Any suspected incidents of fraud, theft and/or irregularity relating to cybersecurity are reported and managed as outlined in section 6.

15. Record keeping

The Trust keeps financial records and has appropriate internal controls to provide evidence for business reasons and for making payments to third parties. Employees must make the Accountable Officer aware of all hospitality or gifts received or offered over the value of £25 – these are subject to managerial review.

All invoices, accounts and related documents are prepared and maintained with the highest accuracy and completeness.

No accounts are kept "off-book".

The trusts will no longer need to provide an explanation when the board has not met at least six times in the academic year in their governance statement.

The academy trusts will submit an 'Academies budget forecast return' to the DFE by the end of August.

16. Reporting to the DFE

The Chair of Directors will report any instances of fraud, theft and/or irregularity exceeding £5,000 individually, or £5,000 cumulatively in any financial year, to the DFE as soon as possible. Unusual or systematic fraud, regardless of value, will also be reported. When making a report to the DFE, the accounting officer will provide the following information:

- Full details of the event(s) with dates
- The financial value of the loss
- Measures that have been taken to prevent recurrence
- Whether the matter was referred to the police, and, if not, the reasoning behind this
- Whether insurance or the risk protection arrangement (RPA) have offset any loss

Following a report, the DFE may conduct or commission its own investigation into actual or potential fraud, theft or irregularity in the trust, either as a result of a notification from the trust or from other information the DFE has received. Other authorities, including the police, may be involved in the investigation.

The trust will obtain the DFE's prior approval for the supply of goods or services to the trust agreed on or after 1 September where a contract or other agreement exceeds £40,000 in the same financial year ending on 31 August. This approval process will not apply when contracts or agreements for goods or services are arranged between the trust and the following establishments:

- Colleges, universities and schools that are sponsors of the academy trust
- State-funded schools and colleges, including academies

17. Monitoring and review

This policy is reviewed on an annual basis by the Board of Directors, TBM and the Accountable Officer.

The scheduled review date for this policy is annually.

Created or Reviewed by	Date	Changes
Isabel Cooke	30/08/2023	New policy created
Isabel Cooke	20/09/2024	Updates to DFE & Roles and responsibilities
Isabel Cooke	16/10//2025	Updates to DFE & Roles and responsibilities, cyber

Annex A: Indicators of potential fraud

This list is not exhaustive and is a guide only. Due to the nature of fraud, indicators may not be exclusive to just one area.

Personal motives for fraud

- Personnel believe they receive inadequate compensation and/or rewards, e.g. renumeration, recognition, job security, holidays or promotions
- Expensive lifestyle, e.g. luxury cars and holidays
- Personal problems, e.g. gambling, alcohol, drugs or debt
- Unusually high degree of competition or peer pressure
- Related party transactions
- Conflicts of interest
- Disgruntled employees, e.g. being recently demoted or reprimanded
- Recent failure associated with specific individual
- Personal animosity or professional jealousy

Organisational motives for fraud

- Organisation experiencing financial difficulty
- Commercial arm experiencing financial difficulty
- Tight or unusually tight time deadlines to achieve level of outputs
- Organisational governance lacks clarity, direction or substance
- Organisation closely identified with, or dominated by, one individual
- Organisation under pressure to show results, e.g. budgetary matters or exam results
- Organisation recently suffered disappointment or the consequences of bad decisions
- Organisation wants to expand its scope or obtain additional funding
- Funding award or contract for services is up for renewal or continuation
- Organisation due for a site visit by auditors, Ofsted or others
- Organisation has a for-profit component
- Organisation recently affected by new and/or changing conditions, e.g. regulatory, economic or environmental
- Organisation faces pressure to use or lose funds to sustain future funding levels
- Record of previous failure(s) by one or more organisational areas, associated business or key personnel
- Sudden change in organisation practice or pattern of behaviour

Weakness in internal controls

- There is a general lack of transparency about how the organisation works, and its procedures and controls
- Management demonstrates a lack of attention to ethical values – including a lack of communication regarding the importance of integrity and ethics, a lack of concern about the presence of temptations

and inducements to commit fraud, a lack of concern regarding instances of fraud, and no clear fraud response plan or investigation policy

- Management fails to specify and/or require appropriate levels of qualifications, experience or competence for employees
- Management displays a penchant for taking risks
- Lack of an appropriate organisational and governance structures with defined lines of authority and reporting responsibilities
- Organisation lacks policies and communication relating to individual accountability and best practice, e.g. relating to procurement, expenses, use of alcohol and declarations of interest
- Lack of personnel policies and recruitment practices
- Organisation lacks personnel performance appraisal measures or practices
- Management displays a lack of commitment towards the identification and management of risks relevant to the preparation of financial statements
- There is inadequate comparison of budgets with actual performance and costs, forecasts and prior performance – there is also no regular reconciliation of control records and a lack of proper reporting to the governing board
- Management of information systems is inadequate, e.g. no policy on ICT security, computer use, verification of data accuracy, or completeness or authorisation of transactions
- There is insufficient physical security over facilities, assets, records, computers, data files and cash
- Failure to compare existing assets with related records at reasonable intervals
- There is inadequate or inappropriate segregation of duties regarding initiation, authorisation, recording transactions, maintaining custody of assets and alike
- Accounting systems are inadequate, i.e. they have an ineffective method for identifying and recording transactions, no tracking of time periods during which transactions occur, insufficient description of transactions and to which account they should be allocated to, no easy way to know the status of funds on a timely basis, and no adequate procedure to prevent duplicate payments or missing payment dates
- Purchasing systems and/or procedures are inadequate, e.g. poor or incomplete documentation to support procedure, purchase, payment or receipt of goods or services
- Subcontractor records and/or systems reflect inadequate internal controls
- There is a lack of internal, ongoing monitoring of controls which are in place and/or failure to take any necessary corrective actions
- Management is unaware of or displays a lack of concern regarding applicable laws, e.g. Companies Act 2006, Charities Act 2011
- Specific problems and/or reportable conditions identified by prior audits or other means of oversight have not been corrected
- No mechanism exists to inform management, directors, Directors or governors of possible fraud
- General lack of management oversight

Transactional indicators

- Related party transactions with inadequate, inaccurate or incomplete documentation or internal controls, e.g. business activities with friends
- Not-for-profit entity has for-profit counterpart with linked infrastructure, e.g. shared Board of Directors, governors or other shared functions and personnel
- Specific transactions that typically receive minimal oversight
- Previous audits with findings of questioned costs, evidence of non-compliance with applicable laws or regulations, weak internal controls or an inadequate management response to any of these issues

- Transactions and/or accounts which are difficult to audit and/or subject to management judgement and estimates
- Multiple sources of funding with inadequate, incomplete or poor tracking, failure to segregate funds, or existence of pooled funds
- Unusual, complex or new transactions, particularly if they occur at year end or the end of the reporting period
- Transactions and accounts operating under time constraints
- Cost sharing, matching or leveraging arrangements where industry money or another donation has been put into a foundation without adequate controls to determine if money or equipment has been spent/used and whether it has gone to allowable costs and at appropriate and accurate valuations
- Outside entity provided limited access to documentation
- Travel accounts with inadequate, inaccurate or incomplete documentation or poor internal controls, variances between budgeted amounts and actual costs, claims in excess of actual expenses, reimbursement for personal expenses, claims for non-existent travel, or collecting duplicate payments
- Credit card accounts with inadequate, inaccurate or incomplete documentation or internal controls such as appropriate authorisation and review
- Accounts in which activities, transactions or events involve handling of cash or wire transfers
- Presence of high cash deposits maintained with banks
- Assets which are of a nature easily converted to cash (e.g. small size, high value, high marketability or lack of ownership identification) or easily diverted to personal use (e.g. cars or houses)
- Accounts with large or frequent shifting of budgeted costs from one cost centre to another without adequate justification
- Payroll (including fringe benefits) system has inadequate controls to prevent an individual being paid twice or paid for non-delivery or non-existence
- Payroll (including fringe benefits) system is outsourced but there is poor oversight of starters, leavers and payments
- Consultant and subcontract agreements which are vague regarding the work, time period covered, rate of pay or product expected
- There is a lack of proof that a product or service was delivered by a consultant or subcontractor
- Sudden and/or rapid growth of newly contracted or existing education providers, e.g. significant increase in pupil numbers for newly contracted providers

Methods used to commit and/or conceal fraud

Employee indicators such as:

- Eagerness to work unusual hours
- Access to or use of computers at unusual hours
- Reluctance to take leave or seek support
- Insistence on doing their job alone
- Refusal of promotion or reluctance to change their job

Auditor/employee issues such as:

- Refusal or reluctance to provide information or hand over documents
- Unreasonable explanations
- Annoyance or aggressive responses to questions or requests to deter auditors
- Trying to control the audit process

- Auditee/employee blames a mistake on a lack of experience with financial requirements or regulations governing funding
- Promises of cooperation followed by subsequent excuses to limit or truncate cooperation
- Subtle resistance
- Answering a question that was not asked
- Offering more information than asked
- Providing a lot of information in some areas and little to none in others
- Explaining a problem by saying “we’ve always done it that way” or “someone from the government told us to do it that way”
- A tendency to avoid personal responsibility, e.g. overuse of “we” and “our” rather than “I”
- Blaming someone else
- Unreasonable levels of forgetfulness
- Trying to rush the audit process
- Uncharacteristic willingness to settle questioned costs in an attempt to deter further investigation or analysis

General indicators such as:

- A general lack of transparency about how the organisation works and its procedures and controls
- Fabricated explanations to support inability or unwillingness to evidence transactions or assets, such as stated loss of electronic data or theft of business records

Record keeping, banking and other

- Documents that are missing, copied, written in pencil, altered, or that contain false signatures, the incorrect signature or no authorisation where it would be expected
- Deviation from standard procedures, e.g. all files but one handled in a particular way
- Excessive and/or poorly evidenced journal entries and unable to provide an explanation for journal entries
- Transfer to or via any type of holding or suspension account
- Inter-fund company loads to other linked organisations
- Records maintained are inadequate, not updated or not reconciled
- Use of several different banks or frequent bank changes
- Use of several different bank accounts
- Failure to disclose unusual accounting practices or transactions
- Unusual accounting practices or transactions, including:
    - Uncharacteristic willingness to settle questioned costs
    - Non-serial-numbered transactions or out-of-sequence invoices or other documents
    - Creation of fictitious accounts, transactions, employees or charges
    - Writing large cheques to cash or repeatedly to an individual
    - Excessive or large cash transactions
    - Payroll cheques with unusual or questionable endorsements
    - Payees with similar names or addresses
    - Non-payroll cheques written to an employee

- Defining delivery needs in ways that can only be met by one source or individual
- Continued reliance on person or entity despite poor performance
- Treating non-business and/or personal goods or services as business transactions in financial records
- Misuse of a director's loan account facility, e.g. deliberate miscoding of transactions in a director's loan account to gain personal advantage
- Materials goods and/or services fictitiously and erroneously reported as purchased, and evidence has been fabricated to support the claim. This could potentially be evidenced by:
    - Repeated purchases of the same items
    - Identical items purchased in different quantities within a short time period
    - Invoices and statements used to evidence purchase facilitating duplicate transactions or payments
    - Anomalies in the format of purchase invoices
    - Goods or equipment are not used as promised, or they do not work or exist
- Legitimate business assets put to non-business or private use

AHMAT Anti-Fraud & Corruption Disclosure Form	
Your details	
Name:	
Address:	
Contact number:	

Details of the suspected fraud, corruption or bribery	
Name of the person(s) you suspect to be involved in fraud, corruption or bribery:	
Address (if known):	
Job Tittle:	

Please use the space below to provide details of your suspicions. Please provide as much detail as possible including dates, times, locations, conversations and the names of any other parties involved. The more information you can provide, the better the chances of the issue being successfully resolved. If necessary, continue overleaf and attach any additional evidence you may have.

Continued:

Please return this form in an envelope marked ‘Private and Confidential’ to Isabel Cooke.