



# Anti-Fraud and Corruption Policy and Framework

<b>Recommending Body:</b>	Audit & Risk Committee
<b>Approval Body:</b>	Trust Board
<b>Approval Date:</b>	December 2025
<b>Implementation Date:</b>	December 2025
<b>Review Date:</b>	November 2027
<b>Status:</b>	Draft
<b>Policy Version:</b>	V1 – New format

## **1. Executive Summary**

- 1.1 Mulberry Schools Trust (MST) is committed to maintaining the highest standards of honesty, probity and accountability and to the prevention of fraud and corruption. It also expects that organisations and individuals who wish to work with the Trust will act with integrity and with a similar commitment to these values.
- 1.2 It is the responsibility of all trustees and staff to have regard for fraud risk in the carrying out of their duties, recognising that such risk, if uncontrolled, can result in damage to the Trust's reputation, its financial viability, and potentially, its independence.
- 1.3 The Trust has a number of policy statements which outline the organisation's stance on anti-fraud and corruption and provide information and guidance on fraud and corruption related issues. The Anti-Fraud and Corruption Framework document brings together these statements in one place. The policies contained within this framework document are:
- Anti-Fraud and Corruption Policy Framework;
  - Fraud Response Plan (Appendix A);
  - Anti-Bribery Policy (Appendix B); and
  - Anti-Money Laundering Policy (Appendix C)
- 1.4 Other Trust policies and procedures are also important reference points for fraud and corruption related issues and include (but not limited to) the following:
- Staff Code of Conduct;
  - Disciplinary Procedure;
  - Equality, Diversity and Inclusion Policy;
  - Travel and Expenses Policy;
  - Gifts and Hospitality Policy; and
  - Financial Regulations.

## **2. Introduction**

- 2.1 This framework, and its supporting policies, is intended to make it clear to staff, trustees and other service users and our regulators that the Trust takes fraud and corruption seriously and will take robust action against perpetrators where actual or attempted fraud or corruption is detected.
- 2.2 Throughout this policy, reference to "those charged with governance" is a blanket term referring to those charged with governance and includes trustees and local governing body members. Where responsibility lies with a particular sub-group of those charged with governance, this will be specifically referred to.
- 2.3 This framework, and its supporting policies, is also designed to encourage staff and those charged with governance to minimise the risk of fraud, to

promote detection and to ensure that staff and those charged with governance are clear what action needs to be taken if they suspect actual or attempted fraud or corruption. Staff and those charged with governance should read the Fraud Response Plan alongside this strategy.

- 2.4 The Trust will ensure that staff and those charged with governance receive the necessary training and / or guidance to ensure they understand their responsibilities and action they need to take if they suspect attempted or actual fraud or corruption.

### 3. **Definitions**

- 3.1 Fraud is defined as:

*"Fraud by false representation" is defined by Section 2 of the Act as a case where a person makes "any representation as to fact or law ... express or implied" which they know to be untrue or misleading.*

*"Fraud by failing to disclose information" is defined by Section 3 of the Act as a case where a person fails to disclose any information to a third party when they are under a legal duty to disclose such information.*

*"Fraud by abuse of position" is defined by Section 4 of the Act as a case where a person occupies a position where they are expected to safeguard the financial interests of another person and abuses that position; this includes cases where the abuse consisted of an omission rather than an overt act.*

- 3.2 Corruption is defined as:

*"The unlawful offering, giving, soliciting or acceptance of an inducement or reward which could influence the action taken by the Trust, its members or its staff. This also covers the failure to disclose an interest in order to obtain a pecuniary gain or other benefit".*

- 3.3 For the purpose of this policy, the definition of fraud and corruption includes:

- abuse or theft of the Trust's funds or other assets; and
- involvement in bribery or other instances of corruption.

- 3.4 The Economic Crime and Corporate Transparency Act 2023 includes provisions that make businesses liable if they fail to prevent staff or a connected third party from committing an economic crime. The offences covered under this Act include the Fraud Act offences listed above, and also includes false accounting.

- 3.5 The organisation will be liable if an employee or associate commits one of the listed offences, that offence has a benefit for the organisation, and the organisation does not have reasonable procedures in place to prevent fraud. This Anti-Fraud and Corruption Framework, as part of the Trust's wider

policy framework, sets out the policies and procedures in place to prevent fraud and ensure compliance with the Act's requirements in this regard.

#### 4. **The Trust's Approach to the Management of Fraud Risk (Policy Statement)**

4.1 Our approach is based on a series of comprehensive and related elements designed to deter fraudulent or corrupt acts. These elements are:

- the operating culture of the organisation;
- deterrent and preventative measures;
- detection and investigation procedures;
- awareness and training.

4.2 Supporting this are a number of interlinked policies, such as the Trust's Fraud Response Plan, Anti-Bribery Policy, [Whistleblowing Policy](#), Anti-Money Laundering Policy and Gifts and Hospitality Policy. Each of these documents provides more detailed information and guidance on our anti-fraud and corruption procedures.

4.3 The Trust is committed to the seven principles of public life, namely objectivity, openness, leadership, accountability, honesty, selflessness and integrity. High ethical standards should be adhered to and be demonstrated in all our actions and decisions.

4.4 We expect those charged with governance and staff to lead by example in demonstrating opposition to fraud and corruption by adhering to our rules and regulations, and ensuring that all practices and operating procedures beyond reproach

4.5 The Trust requires all individuals and organisations with whom it deals in any capacity to act with integrity, and are encouraged, alongside staff and partners, to raise any concerns they may regarding fraud and corruption through our [Whistleblowing Policy](#).

4.6 Where appropriate we will co-operate with other organisations, local authorities and public sector bodies in the prevention, detection and investigation of fraud and corruption, for example, participation in the National Fraud initiative and liaison with the Police.

4.7 This Policy and procedures set out the Trust's commitment to ensuring compliance with the requirements of the Fraud Act 2006, the Economic Crime and Corporate Transparency Act 2023, and the Academy Trust Handbook 2025 (or latest version if superseded).

## 5. **Operating Culture**

### ***Those Charged with Governance***

- 5.1 Members must maintain the highest standards of accountability and probity and at all times comply with the requirements of the Trust's Code of Conduct.
- 5.2 The Trust will not tolerate fraud, impropriety or dishonesty and will investigate all instances of suspected fraud, impropriety, or dishonesty conduct by staff or external organisations (contractor or client).

### ***Local Government Body Members (LGBMs)***

- 5.3 LGBMs must maintain the highest standards of accountability, probity and at all times, comply with the requirements of the Trust's Code of Conduct.

### ***Management***

- 5.4 Managers at all levels have a responsibility for the prevention of fraud and corruption. This will be achieved by ensuring the operation of effective internal control within all financial and operational systems.

### ***Our Staff***

- 5.5 All staff should observe the requirements of the Trust's Code of Conduct, Governance Arrangements and Financial Regulations. We expect all staff to maintain honesty and integrity at all times and act with propriety in the use of resources and in the handling and use of funds whether they are involved with cash or payment systems, receipts or dealing with contractors or suppliers.

### ***Audit and Risk Committee***

- 5.6 The Trust's Audit and Risk Committee will review the effectiveness of the internal control and risk management systems. The Committee will also evaluate whether management is setting the appropriate control culture in the way it communicates the importance of internal control and risk management across the organisation.

## 6. **Deterring Fraud**

- 6.1 Management are responsible for maintaining, and ensuring that staff are aware of the key elements of **the internal control framework** which consists of:

Written standing orders and financial regulations that delineate responsibilities and levels of authorities;

- Annual budgets, set in the context of a longer-term business plan, with clear accountability for control of each part of the budget;

- Formal budgetary control arrangements with a monthly reporting cycle, including regular reporting of variances;
- Approval of the parameters under which new investments in properties are entered into;
- Secure information technology for the management of the organisation's financial and property management / maintenance systems;
- HR management strategies including clear management structures and written responsibilities for senior posts;
- A comprehensive corporate and team based risk assessment and management framework;
- An internal audit function working to a risk based audit plan; and
- A comprehensive fraud management strategy covering prevention, detection, reporting and recovery of assets.

6.2 The adequacy and appropriateness of our financial and operational systems are independently monitored and assessed by both internal and external audit. Senior Managers are expected to consider and act upon all audit recommendations on a timely basis.

6.3 All recruitment activity is required to be in accordance with the Trust's HR Policies and Procedures. In particular, appropriate checks such as written references must be obtained to confirm the honesty and integrity of staff before appointments are made and Disclosure Barring Service (DBS) checks must be undertaken where appropriate for the post being recruited. Effective recruitment, whether via agency or direct, is one of the most important controls in the prevention of fraud.

6.4 The responsibility for fraud detection primarily rests with management. However, the Central Finance Team offers additional support by performing both a fraud prevention and fraud detection role. The team carries out system based reviews and probity audits covering all areas of activity. Internal Audit will also assist departments (and if necessary conduct or oversee) with formal investigations.

6.5 It is not the external auditor's responsibility to prevent fraud and irregularity. External auditors are alert to the possibility of fraud and irregularity, and will discharge their professional responsibilities by immediately reporting any serious concerns to the Trust Board.

## 7. **Proactive Anti-Fraud Initiatives**

7.1 The Trust will participate in anti-fraud and corruption activities, as appropriate, where there is a benefit to the Trust, or wider community. For example, the Audit Commission's National Fraud Initiative.

7.2 Internal Audit will incorporate fraud and corruption issues in all work they undertake. Internal Audit will periodically deploy specialist fraud detection software and undertake proactive data analysis to detect unusual patterns in data. The Trust reserves the right to inspect all data held within the

organisation subject to the data protection guidance provided by the Information Commissioner.

## **8. Code of Conduct and Register of Interests**

8.1 The Trust's Code of Conduct outlines the standard of behaviour expected from staff, and those charged with governance, and details the registration of interests' process. This is aimed at ensuring openness in regard to potential conflicts of interest.

## **9. Prosecution and Publicity**

9.1 Fraud and corruption are serious offences and staff may face disciplinary action if there is evidence that they have been involved in these activities.

9.2 The CEO will determine, in discussion with the Chair, whether civil, and / or criminal prosecution is appropriate having considered:

- Indicative costs;
- Benefits likely to accrue in terms of deterrent;
- Public interest;
- Likelihood of asset recovery;
- Likely positive / negative impact of resulting publicity; and
- Regulatory stance.

9.3 The CEO of the Trust will determine, in discussion with the Chair as appropriate, the organisation's publicity of any incident of fraud or corruption, or any publicity opportunities associated with the promotion of any anti-fraud activity.

## **10. Detection and Investigation**

10.1 In the majority of cases, it is the diligence of staff and the alertness and good citizenship of the public at large that detects acts of fraud or corruption.

10.2 Staff should be aware that fraud, corruption and theft may exist within the workplace and are encouraged to share any concerns with management under the Trust's [Whistleblowing Policy](#) and Code of Conduct. Any concerns should normally be raised with immediate line management or alternatively, another manager or SLT member. Suppliers and contractors may raise concerns, without fear of victimisation, directly to the CEO or CFO. Our key stakeholders and the general public can raise concerns via the Complaints Procedure or by writing to the CEO of the Trust or the Trust's Senior Leadership team.

10.3 The CEO will consider all reported incidents as per the Fraud Response Plan. During the investigation the investigating officer will contact any other relevant parties to ensure all allegations and evidence are properly investigated and reported upon.

10.4 When referrals are passed to the police, the Crown Prosecution Service will initially determine whether a prosecution will be pursued. However, the Trust reserves the right to pursue a private prosecution in the criminal or civil courts. The Trust's procedures will be used to facilitate a thorough investigation of any allegations of improper behaviour by staff.

## 11. **Awareness and Training**

11.1 Training and guidance are vital to maintaining the effectiveness of the Anti-Fraud and Corruption Strategy. The Trust supports induction and work related training and will ensure that fraud awareness training is provided to those charged with governance and senior managers. In order to raise awareness of this strategy and fraud and corruption in general, the Trust will publicise our approach via our website, and other publications as appropriate.

## 12. **Reporting**

12.1 Trust staff have a clear duty to report all instances of actual, suspected or attempted fraud to their line manager and / or Academy Lead (Headteacher / Principal or equivalent), who also have a duty to report these instances to the CEO.

12.2 The CFO maintains the Group's fraud register. Any new entries are reported to the next meeting of the Audit and Risk Committee, alongside any implications for the internal control system.

12.3 In relation to the reporting of concerns regarding potential fraud or corruption, staff and members should be aware of the provisions of the Trust's [Whistleblowing Policy](#). This recognises that, in some cases, individuals will need to come forward on a confidential basis. Our Code of Conduct and [Whistleblowing Policy](#) make it clear that they can do so without fear of reprisal or victimisation. Additionally concerns can be raised direct to the Trust's internal or external auditors (contact details contained within the Trust's Statutory Accounts – published on the website).

12.4 The Trust will comply with the DfE's reporting requirements regarding fraud (in line with the Academies Trust Handbook). In addition, the CFO will advise the Chair of the Audit and Risk Committee of all immediately upon discovery and any fraud or corrupt act perpetrated or attempted by a senior member of staff (no matter how low its value).

12.5 The Trust's [Whistleblowing Policy](#) also outlines the circumstances in which allegations may be reported to external bodies.

## 13. **Review of Policy and Framework**

13.1 The Anti-Fraud and Corruption Policy and Framework will be reviewed and updated at least every two years.

13.2 In carrying out this review, the Trust will take account of best practice and advice from internal and external auditors and of legal and regulatory requirements.

## Appendix A

### Fraud Response Plan

#### 1. Purpose

The purpose of this plan is to:-

- Advise management on the initial steps to take in the event of suspected fraud or other irregularity, and to provide a picture of how an incident will be dealt with from the start of the process to the end; and
- Outline a policy so that all concerned are aware of their roles and reporting lines, particularly in relation to more serious incidents, so avoiding misunderstanding and/or delay.

#### 2. Notification

Fraud and other irregularity can take many forms, including theft or cash assets, deliberate overpayment, non-receipt of goods paid for, and falsification of records. There are many other possibilities, however, and anyone in doubt as to whether something may constitute fraud or something similar should immediately seek advice, either from their manager or a senior member of the Central Finance Team.

Anyone suspecting fraud, theft or irregularity involving funds or assets should report it without delay to their line manager, and the issue should be reported immediately thereafter to Director level. Directors must inform the CEO of the Trust. Issues involving Directors or substantial fraud / losses may be reported directly to the CEO or CFO.

#### 3. Response

Reporting incidents may take place through different routes, e.g. normal reporting via line management or perhaps through the [Whistleblowing Policy](#) or direct to the Trust's internal or external auditors (contact details contained within the Trust's Statutory Accounts – published on the website). The following process will be applied as far as possible, regardless of reporting route.

Investigation of lower level incidents may be left to local management with advice from the Central Finance Team. As there may be some crossover into the disciplinary area, advice should be obtained from HR at an early stage. For all incidents where fraud or other irregularity is not disproved after initial investigation, the appropriate referral (see below) form for entry into the Frauds and Losses Register should be completed and forwarded to the CFO.

The Fraud or Other Irregularity Referral Form is shown in Appendix A1.

Larger or more complex incidents may require active involvement from Central Finance and / or internal audit, who will liaise with HR and management of the team concerned with the incident. There may be an initial report by Central Finance and / or internal audit, which may then be used by an Investigating Officer operating under the disciplinary policy, or it may be appropriate for the Investigating Officer to prepare a report directly: Central Finance and / or internal audit, HR and management will consult in reaching these decisions.

Immediately after the discovery of any incident, the highest priority should be given to the prevention of further loss, or potential loss of records and witnesses e.g. HR suspension or removal of an individual from a particular office or area of operation.

In some instances, it may be appropriate to refer incidents to the Police, either following discovery, or after an initial investigation. Any such referral will be made as a result of a decision by the CEO of the Trust after consultation with the appropriate Director (clearly, this does not refer to obvious break-ins, assaults, other urgent matters, which should be referred to the Police by on-site staff as normal).

Reports prepared by management or Internal Audit should address the following:

- Quantification of loss as far as possible;
- Identification of system weaknesses;
- Origin of the weakness (i.e. was it always weak, or did something happen to make it so?);
- How and by whom does the weakness appear to have been exploited (final conclusions as to personal culpability will normally be for the disciplinary process to determine); and
- The remedy for the weakness and progress toward implementing this.

Reports dealing with system weakness should be made available to the responsible Director, with any issues with a potential financial impact brought to the attention of the CEO.

Central Finance will ensure that reports on all incidents (in summary for minor matters, more detailed for serious issues) are submitted to the Audit and Risk Committee.

For serious incidents, attempts to recover any losses will be considered at SLT or the Audit and Risk Committee. In less substantial cases, recovery can be considered by local management with advice from HR and Central Finance.

#### **4. Guidance for Managers Dealing with Referrals for Suspected Irregularity, Misconduct or Fraud**

Managers should treat all staff concerns seriously and sensitively. The following procedures shall be followed:

Managers should make a written record of all information, and obtain copies of notes produced by staff raising concerns;

Before taking the matter further, the manager will need to determine whether any suspicions appear to be justified by considering the facts as they are presented, based upon information available. At this stage, it may be necessary to contact Central Finance / Internal Audit to informally discuss the issues and seriousness of allegations;

Prior to referral, managers should prepare a written note for the CEO outlining:

- background details in the incident;
- details of the job and areas of responsibility of the individual(s) implicated;
- action taken to date; and
- a description of the systems, controls and procedures that should be operating.

**Appendix A1**

**Fraud Response Plan**

<b>Fraud or Other Irregularity Referral Form</b> <b>Notification of Disproved Fraud or Other Irregularity (Investigated by Local Management Team)</b>					
Name: (Of Initial Reporter)			Academy / Location:		
Job Title:			Date Raised:		
Reviewer / Investigator:			Date Reviewed:		
Description of Alleged Fraud or other Irregularity	Date of Investigation	Summary of Investigation	Fraud / Irregularity Value £ (if known)	Evidence Reviewed	Investigation Findings

I certify that I have investigated the above fraud or other irregularity and confirm that after due consideration of the evidence, and to the best of my knowledge, I cannot dismiss this allegation and therefore I refer this matter to the Trust senior management for further detailed review.

Reviewer Signature:

Date:

**Form to be sent to the CEO**

## Appendix B

### Anti-Bribery Policy

#### 1. Purpose

The purpose of this policy is to affirm the Trust's intolerance for bribery and other forms of corruption, and to ensure compliance with all applicable anti-bribery and corruption regulations.

#### 2. Policy Statement

This Anti-Bribery Policy and procedures sets out the Trust's commitment to ensuring compliance with the requirements of:

- The Bribery Act 2010;
- Criminal Finances Act 2017;
- Economic Crime and Corporate Transparency Act 2023; and
- The Fraud Act 2006.

For clarity, bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is the Trust's policy to conduct all of our business in an honest and ethical manner. The Trust is committed to acting within the law, fairly and with integrity in all its business dealings, and this is reflected with its policies and statements.

#### 3. Scope

This policy covers:

- Bribes;
- Gifts and hospitality; and
- Charitable contributions.

The Trust expects its staff never to engage in any form of bribery, either directly or through any third part. Further staff must not offer or give any gift or hospitality:

- which could be regarded as illegal or improper, or which violates the recipient's policies;
- to any public employee or government officials or representatives, or politicians or political parties; or
- which has a significant monetary value or could be viewed as excessive (for gifts a nominal value of £5 has been included in the Code of Conduct.

The Trust's Code of Conduct and the Gifts and Hospitality Policy deals in more detail with receipt of gifts or hospitality by staff, LGBMs or trustees.

Some charitable support and donations are appropriate, but budget holders should obtain the approval of a Director, while trust board approval should be obtained for larger payments. There must be no intent to obtain personal or business advantage as a result of any donation, nor there any possible reasonable interpretation which would lead to this conclusion

#### **4. Staff and Member Responsibilities**

Staff and Members are responsible for complying with this Policy in neither giving bribes nor doing anything which might be interpreted as bribery.

There is also a responsibility on staff and members to report any instance of being asked to supply a bribe, or any suspicion of a colleague contravening this policy in any way. Ways to report concern are shown in the Trust's Fraud Response Plan (See Appendix A above).

## Appendix C

### Anti-Money Laundering Policy

#### 1. Purpose

1. The purpose of this policy is to affirm the Trust's zero tolerance approach to fraud and corruption and as such will be taking a proactive approach to the prevention, detection and reporting of all suspected fraud.

#### 2. Policy Statement

This Anti-Money Laundering Policy and procedure sets out the Trust's commitment to ensuring compliance with the requirements of the Proceeds of Crime Act 2002, Economic Crime and Corporate Transparency Act 2023 and the Money Laundering Regulations 2017.

The Trust will ensure that we have sufficient controls in place to minimise the risk of the Trust being used for money laundering purposes.

Common methods of money laundering include (but not limited to) receiving the proceeds from the misuse of asset / property sales for criminal purposes and human / drug trafficking.

The most effective way to manage this risk is to ensure that our procedures alert us if criminals try to use our Trust for money laundering. We will train our staff to help them to be alert to this risk. Our staff will be clear as to the checks necessary when dealing with cash/ electronic funds so that they do not inadvertently facilitate or become exposed to money laundering.

It is every staff responsibility to be vigilant and report their suspicions immediately. Once staff have been made aware of a potential threat, they should take the necessary steps to prevent it and report any suspicious activity in line with this policy and procedure.

#### 3. Scope

This policy applies to all staff employed by the Trust including temporary and permanent staff, agency staff, consultants, Board and Committee Members.

The following are the possible warning signs for concerns regarding Money Laundering:

- unusually secretive behaviour, including reluctance to provide requested information without a reasonable explanation;
- payment of any substantial sum in cash (over £1,000);
- doubts about the honesty, integrity, identity or location of the people involved;
- involvement of a third party without a logical reason or explanation;

- any overpayments for no good reason;
- any doubt as to the ability of a person to have a legitimate source of the funds received;
- significant changes in the size, nature and frequency of transactions with a fee-payer or donor that is without reasonable explanation, for example if payments start to be made from a different jurisdiction;
- cancellation, reversal or requests for refunds of earlier transactions.
- A history of poor business records, controls or inconsistent dealing.
- Requests for account details outside the normal course of business.

#### 4. Legislative Provisions

##### ***Proceeds of Crime Act (POCA) 2002***

This primary piece of legislation criminalises all forms of money laundering and creates offences concerning failure to report suspicion of money laundering. The reporting of obligations in POCA are applicable to everybody in the UK that may interact with an individual or business, whereby they may commit a money laundering offence.

The three main money laundering offences are contained in sections 327, 328 and 329 of the Act. These offences are punishable by a maximum of 14 years imprisonment and / or a fine.

In addition, sections 330 and 331 of the Act, create an obligation on those persons in the regulated sector to report their suspicion or knowledge of another person's money laundering to the NCA. Failure to report is a criminal offence.

##### ***Money Laundering Regulations (MLR) 2017***

Schools and Higher Education Institutes are not generally subject to the MLR, but good practice suggests that the Trust should have sufficient controls and systems in place as if it was covered by the regulation.

Therefore, the Trust recognises that the expected MLR controls to prevent, identify and raise suspicions are good practice for any business and therefore should form the basis of the Trust's Anti-Money Laundering Policy and Procedures.

##### ***Economic Crime and Corporate Transparency Act 2023 (ECCTA)***

This new legislation includes provisions whereby organisations are liable if they fail to prevent staff or a connected third party from committing an economic crime. This includes core offences under the Fraud Act 2006 (false representation, failure to disclose information and abuse of position) and includes false accounting. Money laundering is not deemed an offence.

Whilst money laundering is not classed as an offence under this legislation, the obligations to ensure there are appropriate fraud prevention measures,

including a robust accounting control framework, will equally apply in respect of prevention of money laundering.

## 5. **Trust and Staff Member Responsibility under this Policy**

### ***Money Laundering Reporting Officer***

The Trust's CFO (pdoel@mulberryschoolstrust.org) is the Money Laundering Reporting Officer (MLRO), and is the key contact for reporting and money laundering concerns,

The MLRO will introduce and maintain systems and controls to prevent money laundering including the internal reporting of suspicions or knowledge of money laundering.

The MLRO is responsible for deciding whether a Suspicious Activity Report is required or not, and for making sufficient investigations into reports of money laundering, collecting records and complying with the requirements of the POCA, MLR and other related guidance.

The MLRO will acknowledge receipts of all Suspicious Activity Reports within three working days of receipt. The MLRO will endeavour carry out reviews as soon as practicably (within ten working days where possible) and make any necessary reports.

### ***Staff Obligations to Disclose Suspicions***

All staff across the Trust should report any suspicions to the MLRO immediately as they arise in accordance with the disclosure procedure. Please see Appendix D1 and D2 attached.

Swift and documented disclosure is a key responsibility of staff and failure may result in the Trust unwittingly becoming party to an illegal transaction.

Staff should use the above Fraud form – Internal Suspicions Activity Report and send to the MLRO via email.

Staff must not discuss their suspicions with the suspect(s) and must take any action which may alert the suspicions.

Directly or inadvertently tipping off a suspect is not only a criminal offence punishable by a fine or a term of imprisonment but may also involve disciplinary action for the staff member(s) involved.

### ***Training***

The MLRO will make all staff aware of the requirements and obligations placed on the Trust and on themselves as individuals by the anti-money laundering legislation and give targeted training to those most likely to encounter money laundering.

### ***Identity Checks***

The MLRO will ensure that staff are aware of the need to carry out identity check for all cash donors or large cash payments (see below) to the Trust.

### ***Cash Payments***

The Trust should not accept payments if the cash sums exceed £1,000 unless it has been approved by either the Academy Lead, CFO or the MLRO.

### ***Record Keeping***

The MLRO will ensure that the following records are maintained securely and confidentially on behalf of the Trust:

- Copies of, or references to, the evidence obtained of a donor / payee's identity for a period of five years from the date the transaction was completed;
- Records in relation to staff training and also records of any updates in respect of money laundering methods and legislation which have been disseminated to staff;
- All suspicion of MLR reports, subsequent Suspicious Activity Reports, decisions to report / or not to report externally by the MLRO and associated evidence; and
- The normal type of records we keep including: daily records of transactions/ receipts / cheques / paying-in books / general correspondence etc. The formats that we can keep include photocopies, scanned or computerised / electronic records.

## **6. Assurance and Compliance**

A report of money laundering incidents or 'near misses' will be included in the Fraud Register report which is compiled by the CFO and provided to the Trust's Audit and Risk Committee.

## **Appendix D1**

### **Anti-Money Laundering Policy**

<b>Internal Suspicious Activity Report</b>	
Date	

Name and designation of staff member	
Suspected person(s)	
Name / business address / contact number	
Name of client (If different from above)	
Nature of suspicious activity	
Give full details of suspicion and date suspicion first aroused – continue overleaf if necessary	
Include details of any transaction(s)	
Include details of any identity checks	
Attach any other relevant documents	
<b>To be completed by MLRO</b>	

Name and designation of MLRO	Paul Doel Chief Financial Officer (pdoel@mulberryschoolstrust.org)
Refer / Do not refer	
Reason/ rationale for decision	
Signature of MLRO	
Date referred	
Referral reference	
Include in Fraud report to Trust Audit and Risk Committee	Yes / No
Date of Trust Audit and Risk Committee	

**To be sent to the MLRO**

**Appendix D2**

**Anti-Money Laundering Policy**

<b>Reporting Officer Statement</b>
------------------------------------

Office location/ Academy	
Date of incident (As closely as can be ascertained)	
Time (As closely as can be ascertained)	
Nature of incident (Inc. value or estimated approx. value of loss)	
Staff involved (Involved in the process immediately around the incident and/ or as witnesses)	
Third parties involved (as above)	
Event details (Should be supported by witness statements wherever possible)	
Interviews (By, with whom, date/ time and outline outcome)	
Action taken (To investigate and prevent a recurrence)	
Internal notifications (Name and dates)	
Name of Reporting Officer	
Reporting Officer Position	

Date	
------	--

**To be sent to the MLRO**