



Community Services: Education

Argyll House
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To: Heads of all Educational Establishments

Dear Colleague

Procedure regarding defalcations, fraud etc. in educational establishments

The handling of fraud and corruption are outlined within Argyll and Bute Council's financial and security regulations, a full copy of which can be found: https://www.argyll-bute.gov.uk/sites/default/files/part_d_financial_regs_combined.pdf

- 1 Detecting and Investigating Fraud and Corruption
 - 1.1 A member of staff in any school or other educational establishment becoming aware of a suspected or actual defalcation or any other irregularity in connection with the handling of cash, materials, equipment, etc. will immediately inform the Head Teacher/Campus Principal or person in charge.
 - 1.2 The Head Teacher/campus principal or person in charge having been so informed will immediately report this matter to a relevant Head of Service who will then get in touch with the Head of Strategic Finance (internal audit) at Kilmory to request that an investigation be carried out.
 - 1.3 After investigation by the internal audit section a report will be submitted to the Head of Strategic Finance (internal audit).
 - 1.4 The Head of Strategic Finance and the Head of Improvements and HR shall advise the Chief Executive of all such cases and consult with him concerning what further action be taken. The Chief Executive will also consult with the Executive Director of Community Services.
 - 1.5 No approach shall be made to the police except by the Chief Executive or a person acting on his/her authority.

2 External involvement, theft etc.

- 2.1 Where an incident consists of some obvious external involvement such as theft, break-in, etc. the Head Teacher/Campus Principal or person in charge should be informed immediately, and he/she can then make a decision to call in the police. The police should not be contacted unless there is clear evidence of some external involvement.
- 2.2 As soon as the facts have been ascertained, a report in writing of the incident should be sent to the Executive Director of Community Services with a copy to the Head of Strategic Finance (internal audit).

3 Loss of personal possessions

- 3.1 If the incident relates to the loss of personal money or possessions from an educational establishment and it is considered that an immediate police investigation is required, it is in order for the Head Teacher/Campus Principal or person in charge to call in the police.
- 3.2 The Head Teacher/Campus Principal or person in charge should immediately inform the Executive Director of Community Services and also the Head of Strategic Finance.

4 Disciplinary procedures

- 4.1 The procedures for defalcations outlined above do not affect disciplinary procedures which should be carried out in terms of policies issued by the Head of Improvement and HR in respect of local Government employees and manual workers. Depending on the nature of the incident, an employee may be dismissed if his senior officer is reasonably satisfied that an employee has committed an offence to warrant such action. The procedures regarding defalcations can then be activated. On no account, however, in the case of incidents referred to in paragraph 1 above should the police be involved before disciplinary procedures have been carried out.
- 4.2 If there is some doubt in a senior officer's mind about the details of an incident, he/she can invoke the disciplinary procedures.
- 4.3 The disciplinary procedures referred to in paragraphs 1.4 and 4.1 apply to all staff except teaching staff appointed to posts before 1 April 1996. Staff covered by SNCT conditions who have retained their substantive (permanent) post since or before 31 March 1996 are covered by SNCT Disciplining Framework. Any case involving teaching staff, the referral would be to the Executive Director of Community Services and not to the Head of Improvement and HR.

Yours sincerely

Executive Director of Community Services

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