Corinthian Community Primary School

Anti-Fraud Policy
&
Procedures 2026

Incorporating LCC Whistleblowing Policy & Procedures 2023

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1. Introduction

It is important that Governors, Senior Leaders and all members of staff act, and are also seen to act, impartially.

Governors of the Corinthian Community Primary School seek to run all aspects of the school's financial management and business activities with high standards of conduct and integrity.

Corinthian Community Primary School is committed to tackling fraud and other forms of malpractice and treats these issues seriously. It is recognised that some concerns may be extremely sensitive.

In the event that Governors, SLT and members of staff, parents or the community at large become aware of activities which give cause for concern, this Anti-Fraud Policy and Procedures is provided as a reference document to establish a framework within which issues can be raised confidentially. The process allows for concerns to be raised within the school, allows recourse to external parties outside the management structure of the school where this becomes appropriate and provide for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion.

In May 1996 the Nolan Committee published a report on standards in public life as applicable to local public spending bodies. The report identified the following seven principles that should be applied to public life:

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

One important means by which Corinthian Community Primary School demonstrates this is by applying these principles by maintaining a register of business and pecuniary interests.

The report also made a number of recommendations in relation to whistleblowing. The Nolan Committee used the term whistleblowing to mean the confidential raising of problems or concerns within an organisation by a member of staff. This is not "leaking" information but refers to matters of impropriety for example a breach of the law, School procedures or ethics. Nor is whistleblowing the raising of a grievance (which would be dealt with under the Staff grievance procedures). The term whistle blower denotes the person raising the concern or making the complaint.

This document is a public commitment that concerns are taken seriously and will be actioned.

2. LCC Whistleblowing Policy and Procedures 2023 Appendix 1

Corinthian CP School applies the LCC Whistleblowing policy to all employees who are employed by or under the school governing body, members of the governing body, other individuals providing services to the school and partner organisations

3. Anti-Fraud Policy and Procedures

The Anti-Fraud Policy and procedures is required to ensure that the school is protected, to the best of its ability, against fraudulent activity which could result in financial losses and reputational risks.

Aims

- To avoid any fraudulent activity from both internal and external parties.
- Protect the Schools resources.
- To provide a clear reporting process to all stakeholders when fraud is suspected.
- To meet requirements of the Schools Financial Value Standard and audit regulations.

How

- Staff training to identify how to avoid being subject to fraudulent activity.
- Robust financial control measures are in place to reduce fraudulent risk.
- Clear protocols and processes followed when any fraud is suspected.
- Communication to the wider staff on the use and purpose of the policy.

Corinthian CP School is committed to the prevention of fraud and the promotion of an anti-fraud culture.

School operates a zero-tolerance attitude to fraud and requires all staff, governors and volunteers to act honestly and with integrity at all times, and to report all reasonable suspicions of fraud.

Corinthian CP School will investigate all instances of actual, attempted or suspected fraud and will seek to recover any losses and pursue appropriate sanctions against the perpetrators. This may include criminal prosecution, disciplinary action, legal proceedings and professional sanctions.

This policy applies to all staff (full time, part time, temporary and casual), consultants, contractors, volunteers and Governors.

4 Definition of Fraud

The term 'fraud' is often used to describe complex financial offences such as false accounting. However, in its simplest form, fraud is lying. Some people will lie, or withhold information, or generally abuse their position to try to trick someone else into believing something that isn't true. Examples might include:

- Sending fake invoices for goods and services that weren't ordered or received.
- Use of Corinthian CP School charge card to make personal purchases.
- Intercepting a Corinthian CP School cheque and amending the name of the payee and/ or the amount.
- Submitting false claims for sickness or expenses.

Individuals caught committing fraud can be prosecuted under the Fraud Act 2006 if they make a false representation, fail to disclose information or abuse their position.

4.1 Key Responsibilities

The Head teacher/School Business Lead is responsible for:

- Developing, implementing and maintaining adequate systems of internal control that prevent and detect fraud.
- Testing the system of internal control and seeking independent assurance when appropriate.
- Regularly reviewing the anti-fraud policy and compliance with it to ensure it remains effective and relevant to the needs of the school.
- Reporting compliance with the policy on at least an annual basis to the Board of Governors.
- Reporting allegations of actual, attempted or suspected fraud to the Board of Governors.
- Ensuring all allegations of fraud are investigated appropriately, in compliance with relevant policies, procedures and legislation and commencing disciplinary and/ or legal action where appropriate.

The Board of Governors is responsible for:

- Overseeing the financial performance of the school, including its assets, making sure the school's money is well spent and measures are in place to prevent losses or misuse, including arrangements for preventing and detecting fraud.

Staff are responsible for:

- Familiarising themselves with the types of fraud that might affect the school.
- Ensuing they adhere to the agreed policies and procedures, thereby protecting the school's reputation and assets from fraud.
- Reporting allegations of actual, attempted or suspected fraud to the Headteacher, School Business Lead and /or the Board of Governors.
- Assisting in the investigation of suspected fraud when requested to do so, for example by providing witness statements.

4.2 **Reporting Suspicions**

Governors/SLT and staff are an important element of the school's stance on fraud and are required to raise any concerns that they may have. The Board of Governors, Headteacher will deal with any financial irregularities robustly.

Staff should immediately report any concerns about actual, attempted or suspected fraud to the Head teacher. However, if the concerns relate to the Head teacher, staff should report their concerns to the Chair of the Board of Governors.

Under no circumstances should staff investigate the matter themselves.

Should a Governor, SLT or member of staff wish to seek advice about how to deal with an allegation of fraud, or want to report the matter anonymously, they should contact the LCC Internal Audit,

Internal Audit can be contacted by telephoning the City Council's Whistleblowing Line (0151 233 8613); by or by completing the on line form on the City Council's website here; these e-mails are sent directly to an email account within Internal Audit; or by writing to:

Head of Audit
Liverpool City Council
6th Floor,
Cunard Buildings
Water Street
Liverpool
L3 1AH

The Public Interest Disclosure Act 1998 protects employees who raise concerns about certain matters of public interest in good faith. Staff can obtain free independent advice from the charity https://protect-advice.org.uk/

A reporting form has been provided at Appendix 2 to use as a guide to the type of information that should be captured when an allegation of fraud arises.

4.3 Fraud Response Plan

Corinthian CP School has established guidelines for SLT and Governors to use on the immediate actions to be taken in the event of a fraud being discovered or suspected. It covers how and when to seek professional advice, securing evidence and preventing further losses. (Reference Appendix 3 - Fraud Response Plan).

5. Respecting confidentiality

Wherever possible school seeks to respect the confidentiality and anonymity of the whistle-blower and will as far as possible, protect him/her from reprisals. Corinthian CP School will not tolerate any attempt to harass or victimise the whistle-blower, or attempts to prevent concerns being raised, and will consider any necessary disciplinary or corrective action appropriate to the circumstances.

5.1 Raising unfounded malicious concerns

Individuals are encouraged to come forward in good faith with genuine concerns with the knowledge they will be taken seriously. If individuals raise malicious unfounded concerns or attempt to make mischief, this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances.

5.2 Further information

Further information on whistle-blowing can also be found on school website

CORINTHIAN COMMUITY PRIMARY SCHOOL

ANTI-FRAUD and WHISTLEBLOWING

I have read and understood the procedures for reacting to specific situations with regards to whistle blowing and anti fraud.

I agree that the above information is correct. I undertake to provide additional information throughout the academic year should my circumstances change.

Signed:_____ Date: _____

Please return this form to the Clerk of School / Local Governing Body

Appendix 1

WHISTLEBLOWING POLICY AND PROCEDURE

Produced by Schools' HR

Tel: 0151 233 3901

www.schoolimprovementliverpool.co.uk

This policy has been consulted centrally and fully agreed by both teaching and support staff trade unions. To change any aspect of this policy at a school level, the relevant body must consult appropriately with school staff and their recognised trade union representatives.

DOCUMENT STATUS

Version	Date	Action
Version 1	2004	
Version 2	Mar 2015	Revisions agreed
Revision 1	Mar 2019	Revisions agreed at Special JCC
Revision 2	Feb 2023	General amendments included

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WHISTLEBLOWING POLICY AND PROCEDURE

WHISTLEBLOWING POLICY

1. Introduction

1.1 This school is committed to the highest possible standards of openness, probity and accountability. In line with this commitment the school expects all members of the school community who have serious concerns about any aspect of the school's work to come forward and voice those concerns.

1.2 A person who raises a concern is protected by the Public Interest Disclosure Act 1998 which is incorporated into the Employment Rights Act 1996 as long as they have reasonable belief that the complaint is made in the public interest. This legislation protects workers from victimisation, discrimination or disadvantage when they voice legitimate concerns and their actions are not unlawful or contravene other forms of legislation.

2. Purpose

2.1 The purpose of this policy and procedure is to ensure that individuals know how to raise a concern, feel confident in raising concerns and where concerns are raised, reassures them that the concern will be dealt with in confidence and they will be protected from victimisation, discrimination or disadvantage.

2.2 This policy and procedure does not cover matters which are covered by other existing procedures e.g. Grievance Procedure, Disciplinary Procedure, Dignity at Work Procedure, Schools Complaints Procedure etc.

3. Scope

3.1 This policy and procedure applies to

- All employees who are employed by, or under, the school Governing Body;
- All members of the Governing Body
- Other individuals involved in providing services to the school and
- Partner organisations.

3.2 This Policy and Procedure covers serious concerns such as;

- Possible fraud, bribery, corruption and tax evasion and money laundering.
- The unauthorised use of public funds.
- Failures to comply with Standing Orders & Financial Regulations.
- A criminal offence being committed (past, present or likely to be committed).

- Disclosures related to miscarriages of justice.
- Damage to the environment.
- Failure to comply with a legal obligation
- Child protection issues
- Health and safety risks (including risks to the public as well as others of the school community) if reported and not acted upon
- Unauthorised use of public funds
- Sexual, physical or other abuse of others
- Other unethical / criminal conduct including activity which amounts to modern slavery
- Actions which are unprofessional, inappropriate or conflict with a general understanding of what is right and wrong.
- Any attempt to prevent disclosure of the above.

4. Principles

4.1 No Individual will be subject to victimisation or other detriment by reporting concerns which they believe to be true.

4.2 Any concerns reported will be taken seriously and investigated.

4.3 Individuals are encouraged to raise concerns as soon as possible.

4.4 Disclosures made under this procedure will be treated seriously and sensitively, and where appropriate and possible, confidentially. Requests for anonymity, where made, will be considered, but there may be circumstances where anonymity cannot be granted, for example in relation to prosecutions or disciplinary investigations where the individual may be required to provide witness evidence.

4.5 Any person who is the subject of a whistleblowing allegation has legal rights which may be exercised and are independent of the school (and City Council where appropriate).

4.6 Any person raising a concern must have a reasonable belief that it is in the public interest in line with Section 17 of the Enterprise and Regulatory Reform Act 2013. They must also believe that there are reasonable grounds for the concern and will be encouraged to co-operate with any investigation.
Examples of public interest concerns are included at paragraph 3.2.

4.7 Concerns which fall within the scope of other procedures (e.g. employee grievances or general complaints) will be referred for consideration under those procedures.

4.8 All employees have a duty of confidentiality to the school. Where employees make external disclosures of information to the press or other media, disciplinary action may be taken.

4.9 Employees may take legal action independent of the school (and City Council where appropriate). This includes the person who is the subject of the complaint, the complainant and the school (and City Council where appropriate).

WHISTLEBLOWING PROCEDURE

5. Raising a concern

5.1 For employees, the first step is to raise any concern with his or her line manager.

5.2 If the employee feels that the concerns involve the line manager they should speak to the Head teacher. If the concerns involve the Head teacher or a Governor, other than the Chair of Governors, they should raise the concerns with the Chair of Governors. If the concern involves the Chair of Governors they should raise this with the Deputy Chair of Governors. The Governing Body should consider a designated Whistleblowing Governor to deal with any concerns raised involving the Chair and Deputy Chair of Governors.

5.3 If the concerns involve officers of the local authority the employee should raise the concern with the Director of Children and Young People's Services, or another senior manager, such as the City Solicitor. If the concerns involve officers of School Improvement Liverpool the employee should raise the concerns with the Chief Executive of School Improvement Liverpool.

5.4 Where schools are financed/maintained by the Local Authority and concerns are raised which relate to fraud, corruption or other financial irregularity, the school will be responsible for investigating the financial irregularity, however the concern must be reported Internal Audit of the City Council. Internal Audit Service will provide guidance on the investigation and if, and when, matters should be reported to the police. Schools are required to present a report of the findings of any investigation into financial irregularities, including any police referrals to the Internal Audit Service.

5.5 Internal Audit can be contacted by telephoning the City Council's Whistleblowing Line (0151 233 8613); by or by completing the on line form on the City Council's website here; these e-mails are sent directly to an email account within Internal Audit; or by writing to:

Head of Audit

Liverpool City Council

6th Floor,

Cunard Buildings

Water Street

Liverpool

L3 1AH

5.6 When raising a concern individuals should provide as much information as possible including

- The background and history of the concern (including relevant dates, times, names, places, etc.)
- The nature of the concern (examples are given in 3.2)
- The reason why they are particularly concerned about the situation.
- The names of any colleagues/employees who are considered to be either directly involved or who can help with further information.
- Any other background information e.g. lists of documents, etc.

5.7 Concerns should, ideally, be raised in writing as soon as possible.

5.8 All anonymous concerns will be treated seriously, however without contact details it may be difficult to clarify information, gain additional information or carry out an investigation.

5.9 Although it is not expected that individuals are able to prove allegations beyond reasonable doubt any allegations must be based on the reasonable belief of the person making the disclosure.

5.10 Any whistleblowing disclosures or allegations made by members of the public should be handled in the same way as those made by employees.

6. How the school will respond

6.1 The action taken by the school will depend on the nature of the concern raised and will normally be investigated internally by the school. However, in appropriate cases the concerns may be referred to the local authority, a regulatory body or the Police in criminal matters.

6.2 In order to protect the whistle-blower, the school and those accused, initial enquiries will be made to decide whether an investigation is appropriate, and if so, what form it should take, and who should conduct it.

6.3 The overriding principle which the school will have in mind is the public interest.

6.4 Concerns may be resolved by agreed action without the need for an investigation. If urgent action is required this will be taken before any investigation is conducted.

6.5 Where the individual raising the concern has provided contact details the person receiving the concern will send an acknowledgement within 10 working days. If it is possible to say at this stage how the matter is to be dealt with, then more information may be provided, however since investigations often involve maintaining confidentiality, it may not be possible to disclose any further information.

6.6 Concerns or allegations, which fall within the scope of other procedures, for example complaints or grievances, will normally be referred for consideration

under those procedures. In addition, issues initially raised within the Whistleblowing Procedure may also be dealt with within the Disciplinary Procedure. This is in order to protect individual(s) and those accused of misdeeds or possible malpractice.

6.7 If an investigation is to be undertaken an appropriate investigating officer will be appointed, which may be the person who received the concern. Where the individual has provided contact details, an investigation interview should be undertaken unless not required by the whistle-blower. The investigating officer will meet with the individual to gather as much information as possible. Where the complainant is an employee, they will be entitled to representation by a trade union rep or colleague. The investigating officer will inform the individual what steps will be taken and potential timescales for the investigation to be completed. If the matter does not fall under the whistleblowing policy, they will be informed how the matter will be taken forward.

6.8 Employees who are the subject of a whistleblowing concern which is being investigated, may be contacted by the Investigating Officer and a formal investigation will be carried out and the employee has a right to representation by a trade union rep or colleague. This is to ensure that the investigation is fair and open. The details of any concerns raised which are discovered to be untrue will not be kept on the employee's file.

6.9 The investigating officer will consider all the evidence and make a recommendation to the Governing Body and/or the local authority and/or Diocese or Archdiocese. In the case of financial irregularities in maintained schools a report of the findings will be sent to the Internal Audit Service.

6.10 School accepts that those raising concerns need to be assured that the matter has been properly addressed, therefore subject to legal constraints, information will be provided on the outcome of any investigation, to the whistle blower, as long as contact details have been provided.

6.11 School hopes that all cases will be dealt with satisfactorily. If an individual feels that it is right to take the matter further they may refer to the table provided at the end of this section, which provides details of a number of relevant organisations.

7. What to do if a concern is raised with you

7.1 If you receive a concern under this procedure you need to act quickly and with the utmost discretion. All concerns must be evaluated objectively, reviewing the facts as they appear. If appropriate an investigating officer will be appointed.

7.2 In deciding how to progress the concern you should consider the following

- The quality of the information provided and whether all relevant information has been provided or is available.
- Whether there is any corroborating evidence available, such as supporting documentation or testimony of another individual.

- Whether there are obvious motives that may have led to an accusation such as poor working relationships or the possibility of personal gain. There is also the possibility that a concern raised for the wrong reasons may also be true.
- An assessment of the seriousness of the concerns and the potential risks if they are correct or if they are not investigated.

7.3 Where an allegation involves a member of staff the Investigating Officer may wish to contact the schools' HR Adviser for advice and assistance with any investigations.

7.4 Depending on the seriousness of the concern and the amount of evidence available, management may wish to consider suspension of an employee in order that an investigation can be carried out unhindered or without further loss to school. You are advised to consult your HR Adviser in this situation.

7.5 Internal Audit at the City Council* / other appropriate body must be notified of all cases of alleged fraud or financial irregularities, other than benefit claimant fraud. Cases involving benefit claimant fraud should be immediately referred directly to the Counter Fraud Whistleblowing Procedure Team

[*for maintained schools allegations relating to financial irregularities **MUST** be reported to Internal Audit at the City Council. School managers / governors may contact Internal Audit for advice and assistance on any referrals received and guidance on the conduct of investigations.]

8. Making a disclosure outside school or the local authority

8.1 The school and the local authority would encourage an individual to raise a concern internally in order to deal with the matter and remove or reduce any risk. However, if an individual has raised a concern internally and feels that this has not been dealt with satisfactorily or feels that the concern needs to be raised directly with an external body, such as a regulator, you are advised to seek advice before reporting a concern externally. The independent whistleblowing charity, Protect, operates a confidential helpline to provide confidential advice, free of charge to anyone concerned about wrongdoing at work; telephone 020 3117 2520 or email whistle@protect-advice.org.uk

8.2 The following list provides details of, external organisations that you may wish to contact.

The Information Commissioner	The Office of the Information Commissioner Wycliffe House, Water Lane Wilmslow, Cheshire SK9 5AF

	Tel: 0303 123 1113 Email: casework@ico.org.uk Website: www.ico.org.uk
Grant Thornton UK LLP (External Auditor to LCC as appointed by Public Sector Audit Appointments Limited)	Royal Liver Building Liverpool L3 1PS Tel: 0151 224 7200 Email: enquiries.general@uk.gt.com Website: www.grantthornton.co.uk
Merseyside Police	Merseyside Police HQ Canning Place Liverpool L1 8JX Tel: 101 (for calls from Merseyside) or 0151 709 6010 (from outside Merseyside)contact Website: www.merseyside.police.uk/contact/af/contact-us/
The Environment Agency	National Customer Contact Centre PO Box 544 Rotherham S60 1BY Tel: 03708 506 506 Email: enquiries@environment-agency.gov.uk Website: www.gov.uk/environment-agency
Health and Safety Executive	Redgrave Court Merton Road

	Bootle L20 7HS Tel: 0845 300 9923 Website: www.hse.gov.uk/contact/concerns.htm
HMRC	HMRC Fraud Hotline Tel: 0800 788 887 Website: www.gov.uk/government/organisations/hm-revenue-customs/contact/reporting-tax-evasion
Protect (Formerly Public Concern at Work)	Protect The Green House 244-254 Cambridge Heath Road London E2 9DA Tel: 020 3117 2520 Website: https://protect-advice.org.uk/contact-protect-advice-line/
Liverpool Archdiocese	LACE Croxteth Drive Sefton Park Liverpool L17 1AA 0151 522 1000
Diocese of Liverpool	St James' House 20 St James' Road Liverpool L1 7BY

	0151 709 9722

9. Untrue Allegations

9.1 If an individual makes an allegation which they reasonably believe is in the public interest, but the matter is not confirmed by the investigation, then no action will be taken against them.

9.2 If an individual makes an allegation which turns out to be untrue, without reasonably believing the allegation to be made in the public interest (e.g. is made for personal gain), then the matter may be considered under the school's Disciplinary Procedure and disciplinary action may be pursued.

9.3 Employees may take legal action independently. This includes the person who is the subject of the complaint, the complainant and also the school.

APPENDIX 2

FRAUD REPORTING FORM

If you have any concerns about fraud please print and complete this form and address it to the Head teacher, Corinthian Primary School, Inigo Road, Stoneycroft, Liverpool L13 6SH. If the concern raised relates to the Head teacher, please send the form to the Chair of Governors at the above address.

You do not need to give your name. All the information provided will be treated in confidence.

Name of the person(s) or organisation you suspect:

Address: (if known)

Place of work / department / job title: (If known)

Please provide details of your suspicions. You should include as much information as possible. For example, what was said in telephone or other conversations, dates, times and places, vehicles used, as well as the names of any other parties involved: (Continue on a separate page if necessary and attach any additional evidence you may have)

Your details: (please leave blank if you wish to remain anonymous)

Name:

APPENDIX 3

FRAUD RESPONSE PLAN

It is important that allegations of actual, attempted and suspected fraud aren't ignored. Even seemingly insignificant concerns may later reveal a larger, previously unknown problem.

Securing Evidence

Ensure that any concerns are recorded fully. Whenever possible keep written notes that cover:

- Names, addresses and dates of birth.
- Descriptions (height, build, hair colour, ethnicity, clothing, distinctive features)
- Dates and times of key events.
- Vehicle registration numbers and descriptions.
- Details of any conversations had overheard.
- Details of any actions or incidents that were observed.
- Telephone numbers.
- Company and/ or business details.

Secure any physical evidence such as original invoices, receipts, letters, emails, cheques and application forms. Try to minimise how many people and how often evidence is handled. Fingerprint evidence can very quickly be destroyed.

If any of the evidence is on a computer, immediately unplug the computer from its power source. Don't attempt to shut the computer down through its operating system as this can alter or destroy key files and documents.

Whilst initially securing the evidence it is important not to be tempted to begin a more substantial investigation, or accuse individuals directly, without seeking professional advice (see 'Seeking Advice' below).

If an investigation is undertaken without following the appropriate policies, procedures and legislation, or if individuals are accused without sufficient evidence, it may lead to the perpetrators avoiding a disciplinary, criminal or civil sanction.

Preventing Further Losses

It is important to minimise any additional losses. For example, if the allegations concern the theft or loss or banking passwords, PIN's or similar credentials notify the bank immediately.

Equally, if the losses relate to a weak process, for example cash is routinely kept unsecured in a drawer, ensure that the process is changed, at least temporarily, until more permanent and improved processes can be implemented.

Seeking Advice

When an allegation of fraud is discovered, it is important to seek professional advice as soon as possible. Advice can be sought from the School Business Leader, LCC Audit HERE and the Police. General advice about fraud is available from Action Fraud: www.actionfraud.police.uk/

Support for Witnesses

Governors, SLT, members of staff and the public may be feeling vulnerable before, during and after they have brought an allegation of fraud to the attention of the school.

Witnesses should be assured that they have acted appropriately by raising their concerns. and reminded that Corinthian Community Primary School does not tolerate reprisals, victimisation or harassment and will take all reasonable action to protect them.

In addition, the school will take steps to minimise any difficulties anyone may experience as a result of raising a concern. For instance, if they are required to give evidence in criminal or disciplinary proceedings, the school will advise or arrange for them to receive advice and support about the process being followed.

Corinthian Community Primary School

ANTI-FRAUD and WHISTLEBLOWING Procedures

I have read and understood the procedures for reacting to specific situations with regards to whistle blowing and anti-fraud procedures.

I agree that the above information is correct. I undertake to provide additional information throughout the academic year should my circumstances change.

Signed:_____ Date: _____

Please return this form to the Clerk to Governing Body