



Date Adopted: March 2026

Date to be reviewed: March 2027

Quadring Cowley and Brown's Primary School Counter Fraud Policy

*At Quadring Cowley & Brown's Primary School we strive
'to nurture and inspire all children to be well-rounded, confident and
resilient individuals who love learning and are ready for life beyond
school.'*

Article 3- The best interests of the child must be top priority in all actions regarding children.

Introduction

Quadring Cowley and Brown's Primary School is committed to the prevention of fraud and the promotion of an anti-fraud culture. Quadring Cowley and Brown's Primary School operates a zero-tolerance attitude to fraud and requires all staff, governors and volunteers to always act honestly and with integrity, and to report all reasonable suspicions of fraud.

Quadring Cowley and Brown's Primary School will report all instances of actual, attempted or suspected fraud to the Counter Fraud Team at Lincolnshire County Council and where appropriate, they will investigate. The school 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), governors, volunteers, contractors and any individuals acting on behalf of the school.

Definition of Fraud, Bribery and Corruption

Fraud is deliberate dishonest behaviour intended to secure an unfair or unlawful gain or cause a loss to another. Examples include but are not limited to false invoicing, misuse of the school's PCards, falsifying records, or claiming for expenses not incurred.

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. The Fraud Act 2006 details these offences further.

Bribery and corruption involve offering, giving, requesting or accepting an inducement or reward to improperly influence a decision or misuse one's position.

Theft is where someone steals cash or other property. A person is guilty of theft if he or she dishonestly takes property belonging to someone else and has no intention of returning it.

Fraud, bribery, corruption, and theft are all covered by this policy.

Aims and Objectives

The school aims to:

- reduce fraud and corruption losses within the school to an absolute minimum and maintain that level
- protect our valuable resources by ensuring they are not lost through fraud or corruption but are used to support the children at our school
- proactively deter, prevent and detect fraud, corruption and theft

Roles and Responsibilities

The Head Teacher is responsible for developing, implementing and maintaining adequate systems of internal controls that prevent and detect fraud, testing those systems, and reporting compliance to the Governing Body.

The Governing Body is responsible for overseeing financial performance of the school, including its assets, making sure school money is spent appropriately and measures are in place to prevent losses or misuse, including arrangements for preventing and detecting fraud.

All staff must familiarise themselves with this policy, follow procedures, and report any suspicions immediately.

Reporting Suspicions

Staff should immediately report any suspicions of fraud to the Head Teacher (anneka.luffman@quadringleprimary.co.uk or in person). If the concern relates to the Head Teacher, staff should report their concerns to the Chair of Governors (emma.walters@quadringleprimary.co.uk).

Under no circumstances should staff attempt to investigate the matter themselves.

Staff, including the Head Teacher and/or Governors, may also refer to the school's Whistleblowing Policy for alternative confidential reporting routes and protections.

The Public Interest Disclosure Act 1998 protects employees who raise concerns in the public interest and do so in good faith.

Fraud Response Plan

Please refer to Appendix A for the full fraud response plan.

Quadringle Cowley and Brown's Primary School will take immediate steps to assess concerns, seek advice from appropriate bodies where necessary, and determine the appropriate course of action. All suspicions will be taken seriously, treated with confidentiality and investigated proportionately.

Where appropriate, the school may seek advice from, or refer the matter to, Lincolnshire County Council Counter Fraud Team for independent guidance or investigation.

Where an investigation substantiates fraud or attempted fraud, the School will consider appropriate disciplinary action in line with School policies and may also pursue civil recovery or referral to the Police, where appropriate.

Securing Evidence

Staff should ensure that any concerns are raised to the appropriate person at the earliest opportunity to limit the impact that a fraud may have. Where applicable, concerns should be recorded fully, including dates, times, people involved, and details of any conversations or actions observed. Physical evidence such as invoices, receipts or letters should be secured with minimal handling. Digital evidence should not be altered.

If an investigation is undertaken without following the appropriate policies, procedures and legislation, it may compromise the investigative process.

Preventing Further Losses

If banking details, login credentials, or financial systems may have been compromised, immediate action should be taken to secure accounts. Weak processes contributing to losses should be corrected as soon as possible.

Seeking Advice

Staff seeking confidential advice may refer to Lincolnshire County Council's Whistleblowing facility:

- Telephone: 0800 085 3716 (dedicated confidential freephone number)
- Email: whistleblowing@lincolnshire.gov.uk
- Post: Lincolnshire Local Authorities, PO Box 640, Lincolnshire County Council, LN1 1WF

Staff should not attempt to investigate concerns themselves to avoid contamination of evidence or jeopardising further action.

Support for Witnesses

The school recognises that raising concerns can be difficult. Staff will not suffer detriment for reporting genuine concerns in good faith. Support will be provided as needed, including advice where staff are required to take part in investigations.

Policy Review

This policy will be reviewed annually by the Headteacher and Governing Body, or sooner if required.

Appendix A



FRAUD RESPONSE GUIDE FOR SCHOOLS

COUNTER FRAUD TEAM

September 2025

CounterFraud@Lincolnshire.gov.uk

This guide provides an example to schools of the step-by-step process they should follow when responding to suspected or confirmed fraud. It is based on Lincolnshire County Council's Counter Fraud and AntiCorruption and Whistleblowing policies. It is designed to be practical, clear, and aligned with best practices.

DETECTION OR SUSPICION

- Staff, governors, or external parties identify red flags, changes in behaviours, or anomalies.
- Suspicion may arise from internal controls, audits, or whistleblowing reports.

REPORTING THE CONCERN

- Report immediately to the Headteacher (if appropriate to do so) or directly to the Counter Fraud Team (CFT) at Lincolnshire County Council (LCC).
- If reported to the Headteacher, they should then liaise with CFT.
- Use secure and confidential channels such as the whistleblowing hotline or email.
- Refer to the school's Whistleblowing Policy for full details.

INITIAL ASSESSMENT

- CFT will review the report of fraud to determine if the concern is credible and requires investigation.
- CFT will secure relevant documents, systems, and evidence as appropriate.

LIAISE WITH RELEVANT DEPARTMENTS

- Fraud investigations are conducted by CFT in conjunction with HR. In order for an investigation to progress HR must be informed.
- HR will arrange a strategy meeting between them, CFT, and the manager commissioning the investigation to discuss the details and agree on the next action.
- Where required, HR may decide to limit the subject of the investigation's access to prevent further loss or tampering.
- Where necessary, a referral to the police may be required. This will be determined by CFT.

LAUNCH INVESTIGATION

- CFT will assign a principal investigator to investigate the allegations made. This will be conducted in line with LCC's Counter Fraud and Anticorruption policy and Disciplinary policy.

CONCLUDE INVESTIGATION

- CFT will produce a report that details whether the evidence gathered proves or disproves the allegation(s) made.
- This report will be shared with HR and the Commissioning Manager. They will decide on the outcome of the investigation.

TAKE ACTION

- Progress disciplinary process if necessary.
- Initiate civil recovery, where applicable
- CFT will assist with criminal prosecution, where applicable.
- Implement corrective actions to prevent recurrence.

REVIEW AND LEARN

- Review internal controls and policies.
- Update training and awareness programs.
- Record lessons learned and update the Fraud Response Plan accordingly.