



Atomix
Educational
Trust

Fraud, Anti-Bribery and Whistleblowing Policy



Date of Last Approval/Revision	March 2026
Review Interval (Years)	Two
Approval/Review Body	Review by CET with approval by the Trust Board
Date of Next Review	March 2028
Public File Location	SharePoint/Trust website

1. Introduction

Atomix Educational Trust is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we expect all employees, sub-contractors and others we deal with to inform senior managers if they are concerned about serious malpractice, fraud or corruption within the trust.

This policy makes it clear that you can raise concerns without fear of victimisation, discrimination or disadvantage. It is intended to encourage and enable employees and others to raise issues of serious concern within the trust.

The policy applies to all employees and those contractors working for the trust, including agency staff and builders. It also covers suppliers and those providing services under contract with the trust on their own premises.

The Central Executive Team is responsible for the prevention, detection and investigation of irregularities. To discharge this responsibility, they must ensure that an adequate system of internal control is in place. The work of internal audit in reviewing the adequacy and effectiveness of the internal control system will help management to prevent and detect fraud or bribery.

2. Aims and scope

Existing procedures are in place to enable employees to lodge a grievance relating to their employment, or learners to complain about the quality of service provided. This policy is intended to cover major concerns that fall outside the scope of other procedures. These include:

- Conduct that is an offence or a breach of law
- Disclosures related to miscarriages of justice
- Serious health and safety risks, including risks to the public as well as other employees
- Damage to the environment
- The unauthorised use of public funds
- Abuse of learners
- Other unethical conduct

In relation to fraud, the purpose of this policy is to define authority levels, responsibilities for action and reporting lines in the event of a suspected fraud or irregularity. The use of this policy should enable the trust to:

- Prevent further loss
 - Inform the police at the appropriate time and establish lines of communication with them
 - Establish and secure evidence necessary for criminal and disciplinary action
 - Notify the funding body where circumstances are covered by the mandatory requirements of the Academy Trust Handbook
 - Recover losses
-



- Deal with requests for references for employees disciplined or prosecuted for fraud
- Review the reasons for the incident, the measures taken to prevent a recurrence and any action needed to strengthen future responses to fraud
- Keep all personnel with a need to know suitably informed about the incident and the trust's response
- Assign responsibility for investigating the incident
- Establish circumstances in which external specialists should be involved

Any serious concerns about any aspect of service provision, the conduct of employees, or members and others acting on behalf of the trust can be reported under this policy.

3. Safeguards

Atomix Educational Trust is committed to good practice and high standards and wants to be supportive of its employees. Any employee who raises a concern with senior managers will have the right to have the matter treated confidentially.

The trust does not tolerate any harassment or victimisation, including informal pressures, and will take appropriate action to protect individuals who raise a concern in good faith.

Any investigation into allegations of potential malpractice will not influence, or be influenced by, any disciplinary or redundancy procedures that might already affect individuals who raise a concern.

4. Anonymous allegations

This policy encourages individuals to put their name to an allegation wherever possible. Concerns expressed anonymously are much less powerful but will be considered at the discretion of the trust.

In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

5. Malicious allegations

If an allegation is made in good faith but is not confirmed by the investigation, no action will be taken against the individual reporting the issue. If, however, an allegation is proved to have been made frivolously, maliciously or for personal gain, disciplinary action will be taken against the individual raising the concern. Wilful misuse of this procedure could constitute an act of gross misconduct and may lead to dismissal.

6. The responsible person

The CEO, as accounting officer, has overall responsibility for the operation of this policy. The accounting officer has a personal responsibility to Parliament and to the ESFA's accounting officer for the trust's financial resources. Accounting officers must be able to give assurance of high standards of probity in the management of public funds, particularly in relation to regularity, propriety and value for money.

7. Whistleblowing

7.1 How to raise a concern

As a first step, a whistleblower will normally raise their concerns with their immediate line manager, who will share the concern with the head of centre. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. If the line manager is not the appropriate person for any reason, concerns should be raised directly with the head of centre, who will be the designated officer. Where allegations of malpractice are



made against a head of centre, the CEO will deal with the concerns and be the designated officer. If an individual has a concern about malpractice within the Central Executive Team as a whole, they may contact the Chair of Trustees via the Clerk to the Trust Board.

Initial concerns may be raised verbally but this will need to be supported by written documentation in the following format:

- The background and history of the concern, giving relevant dates
- The reason why the individual is particularly concerned about the situation
- Where the concern relates to safeguarding, it must be raised and dealt with under the safeguarding policy

The whistleblower is not expected to prove beyond doubt the truth of an allegation. They will need to demonstrate to the person contacted that there are reasonable grounds for concern.

A trade union representative or a friend may be invited to be present during any meetings or interviews with the whistleblower, off-site if so desired, in connection with the concerns raised.

On receiving an allegation of serious malpractice, the designated officer will send a written acknowledgement to the whistleblower at their home address within five working days.

The designated officer will inform the CEO and Chair of Trust Board if an allegation has been received. Having made initial enquiries, the designated officer will decide whether an investigation is appropriate and what form it should take. The overriding principle the trust will have in mind is the public interest.

Investigations may be:

- Conducted by trust management through the disciplinary process
- Referred to the Audit Committee, who will decide whether to commission internal audit services or others to undertake a special investigation
- Referred to the police
- The subject of an independent inquiry

The designated officer will report back to the whistleblower in writing as to whether an investigation is appropriate, the progress of any investigation and when it is likely to be concluded.

The trust will take steps to minimise any difficulties for a whistleblower raising a concern. The anonymity of the whistleblower may not always be preserved, particularly where the disclosure might lead to disciplinary action. If the whistleblower is required to give evidence in criminal or disciplinary proceedings, the trust will arrange for advice to be provided on the procedures involved.

7.2 How the matter can be taken further

- If the whistleblower is not satisfied that the designated officer is properly dealing with the concern, they may raise it in confidence with the Chair of Trust Board or Chair of Finance and Audit Committee via the Clerk to the Trust Board
- If the Trust Board finds the allegation to be unsubstantiated, the whistleblower may have a right of access to an appropriate external body to take the matter further. This recourse should only be used when internal procedures have been exhausted. Appropriate outside bodies include internal or external auditors, the ESFA, a trade union or a relevant professional body

7.3 Understanding low-level concerns

Concerns about adults' behaviour may exist on a continuum from low-level concerns, which are concerns that do not meet the threshold of harm, through to allegations that do meet the threshold. This does not mean that behaviours towards learners that cause any concern are insignificant or acceptable. However, clear evidence of harm and disclosure are often required to



meet that harm threshold. It is therefore imperative that information regarding any level of concern on this continuum is shared quickly and effectively.

It is also necessary that the same route of intervention is applied across the continuum, and that any concern is always shared directly with the head of centre immediately. If concerns are regarding the head of centre, they should be shared directly with the CEO.

7.4 Prevention of low-level concerns and creating a safe culture

As part of a trust-wide approach to safeguarding, Atomix Educational Trust will ensure that our settings promote an open and transparent culture in which all concerns about all adults working in or on behalf of a setting, including supply staff, volunteers and contractors, are dealt with promptly and appropriately. Creating a culture in which all concerns about adults, including allegations that do not meet the harms threshold, are shared responsibly with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should: encourage an open and transparent culture; enable our settings to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the trust are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the trust.

A safe and effective response to concerns of any nature demonstrates a culture of taking safeguarding seriously. It also empowers and encourages the workforce to continue sharing concerns and seeking advice from the head of centre across the continuum of concerns, thereby helping to reduce serious incidents.

7.5 Describing low-level concerns

A low-level concern is any concern, no matter how small, that an adult working in or on behalf of a setting may have acted in a way that is inconsistent with the staff code of conduct or staff behaviour policy, including inappropriate conduct outside of work or online, and does not meet the allegations threshold or is not otherwise considered serious enough to consider a referral to the LADO.

Examples of such behaviour include, but are not limited to:

- Being over-friendly with learners
- Having favourites
- Taking photographs of learners on a personal mobile phone
- Engaging with a learner on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate, sexualised, intimidating or offensive language

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns are shared responsibly with the right person, recorded and dealt with appropriately by the head of centre. Ensuring they are dealt with effectively should also protect those working in or on behalf of the setting from potential false allegations or misunderstandings.

7.6 Sharing low-level concerns

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported directly to the head of centre via the staff module of CPOMS. Reports about supply staff and contractors should be notified to their employers by the head of centre, so that any potential patterns of inappropriate behaviour can be identified.

It is critical that staff feel there is a safe environment in which they are encouraged and feel confident to self-refer where, for example, they have found themselves in a situation that could be misinterpreted, might appear compromising to others, or where on reflection they believe they have behaved in a way that falls below the professional standards set out in the staff code of conduct or staff behaviour policy.



7.7 Recording low-level concerns

All low-level concerns will be recorded in writing using the trust's agreed system: the staff module of CPOMS. The record will include details of the concern, the context in which it arose and the action taken. The name of the individual sharing the concern will also be noted; where the individual wishes to remain anonymous, this will be respected as far as reasonably possible.

These records will be kept confidential, held securely and will comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, the setting will decide on a course of action, either through disciplinary procedures or, where a pattern moves from a concern to meeting the harms threshold, it will be referred by the head of centre to the LADO. Consideration will be given to whether there are wider cultural issues within the setting that enabled the behaviour to occur and, where appropriate, policies will be revised or additional training delivered. Records will be retained at least until the individual leaves their employment.

7.8 References

Settings should only include substantiated safeguarding allegations in references. Low-level concerns will not be included in references unless they relate to issues that would normally be included, such as misconduct or poor performance. A low-level concern that relates exclusively to safeguarding and not to misconduct or poor performance will not be referred to in a reference. However, where a low-level concern, or group of concerns, has met the threshold for referral to the LADO and been found to be substantiated, it will be referred to in a reference.

7.9 Responding to low-level concerns

It is the responsibility of the head of centre to fact-find following the reporting of a low-level concern. If the concern has been raised via a third party, the head of centre will collect as much evidence as possible by speaking either directly to the person who raised the concern, unless it was raised anonymously, or to the individual involved and any witnesses. The information collected will help to categorise the type of behaviour and determine what further action may need to be taken. All of this will be recorded on the staff module of CPOMS, along with the rationale for the decisions and action taken.

7.10 Learning from low-level concerns

Following any report of a low-level concern, our settings will review any necessary changes to policy and practice to minimise the chance of a further concern and ensure that the member of staff who reported the concern has been fully supported and empowered to share future concerns. Any changes to policy or practice will be shared with all members of staff via a staff meeting or enhanced training.

8. Dealing with fraudulent matters

Fraud is defined as a wrongful or criminal deception intended to result in financial or personal gain.

Bribery is defined as giving or receiving a financial or other advantage in connection with the improper performance of a position of trust, or a function that is expected to be performed impartially or in good faith.

The trust must be aware of the risk of fraud, theft and irregularity and address it by putting in place proportionate controls. The trust must take appropriate action where fraud, theft or irregularity is suspected or identified.

8.1 References for employees disciplined or prosecuted for fraud

Any request for a reference for a member of staff who has been disciplined or prosecuted for fraud shall be referred to the trust's independent employment advisor. The independent

employment advisor shall prepare any response to a request for a reference having regard to employment law.

9. Fraud response plan

The purpose of this fraud response plan is to define authority levels, responsibilities for action and reporting lines in the event of suspected fraud, corruption or other irregularity.

Fraud, bribery or irregularity can occur unpredictably, in any part and at any level of an organisation. Once a fraud is suspected, prompt action is needed to safeguard assets, recover losses and secure evidence for effective legal and disciplinary processes.

9.1 Initiating action

All actual or suspected incidents should be reported without delay to the Chief Finance Officer (CFO). Within five working days, the CFO should hold a meeting with some or all of the following group to decide on an initial response:

- CEO
- Chair of Finance and Audit Committee
- A senior representative of internal audit
- The relevant head of centre

The above will form the project group and will decide on the action to be taken. This will normally be an investigation led by internal audit. The decision by the group to initiate a special investigation shall constitute authority for internal audit to use time provided in the internal audit plan for special investigations, or contingency time, or to switch internal audit resources from planned work.

9.2 Prevention of further loss

Where initial investigation provides reasonable grounds for suspecting a member or members of staff of fraud, the project group will decide how to prevent further loss. This may require the suspension, with or without pay, of the suspects. It may be necessary to plan the timing of any suspension to prevent the suspects from destroying or removing evidence needed to support disciplinary or criminal action.

In these circumstances, the suspect or suspects should be approached unannounced and supervised at all times before leaving trust premises. They should be allowed to collect personal property under supervision but must not remove any property belonging to the trust. Any security passes and keys to premises, offices or furniture must be returned.

Advice should be obtained on the best means of denying access to the trust while suspects remain suspended, and access permissions to the trust's computer systems should be withdrawn without delay.

Internal audit will consider whether it is necessary to investigate systems other than the one that gave rise to suspicion, through which the suspect may have had opportunities to misappropriate trust assets.

9.3 Establishing and securing evidence

The trust will follow disciplinary procedures against any member of staff who has committed fraud and may also initiate prosecution procedures against any such individual.

Internal audit will:

- Maintain familiarity with the trust's disciplinary procedures to ensure that evidence requirements will be met during any fraud investigation
 - Establish and maintain contact with the police where appropriate
 - Establish whether there is a need for audit staff to be trained in the evidence rules for interviews under the Police and Criminal Evidence Act
-



- Ensure that staff involved in fraud investigations are familiar with and following the rules on the admissibility of documentary and other evidence in criminal proceedings

9.4 Recovery of losses

Recovering losses is a major objective of any fraud investigation. Internal audit will ensure that in all fraud investigations the amount of any loss is quantified. The trust will seek repayment of losses in all cases.

9.5 Reporting to the Trust Board and ESFA

The accounting officer has responsibility to advise the board of trustees and the ESFA of instances of irregularity or impropriety, or non-compliance with the funding agreement or Academy Trust Handbook.

In accordance with the Academy Trust Handbook, the board of trustees must notify the ESFA as soon as possible of fraud, theft and/or irregularity exceeding £5,000 individually, or £5,000 cumulatively in any financial year. Unusual or systematic fraud, regardless of value, must also be reported.

Any variation from this policy, together with the reasons for the variation, shall be reported promptly to the chairs of both the Trust Board and the Finance and Audit Committee.

On completion of a special investigation, a written report, normally prepared by internal audit, shall be submitted to the Finance and Audit Committee containing:

- A description of the incident, including the value of any loss, the people involved and the means by which the fraud was perpetrated
- The measures taken to prevent a recurrence
- Any action needed to strengthen future responses to fraud, with a follow-up report on whether those actions have been taken

9.6 Reporting lines

The project group will provide a confidential report to the Chair of the Trust Board, the Chair of the Finance and Audit Committee, the CEO and the external audit partner at least monthly, unless a request is made for a less frequent schedule. The scope of the report will include:

- Quantification of losses
- Progress with recovery action
- Progress with criminal action
- Estimate of resources required to conclude the investigation
- Actions taken to prevent and detect similar incidents

9.7 Responsibility for investigation

All special investigations will normally be led by internal audit. Special investigations will not be undertaken by senior management, although they should co-operate with requests for assistance from internal audit.

Some special investigations may require technical expertise that internal audit does not possess. In these circumstances, the project group may approve the appointment of external specialists to lead or contribute to the investigation.

10. Related policies

- Staff behaviour and code of conduct policy
 - Keeping Children Safe in Education 2025
 - Academy Trust Handbook 2025
 - Safeguarding and child protection policy
 - Disciplinary policy
-



- [Data protection policy](#)