



The Sutton Academy

Fraud Response Plan Policy

Status	Non-Statutory
Responsible Trustees' Committee	Finance & HR
Date last approved by TB	13/12/2022
Responsible Person	Mrs J Tallant
To Review Date	December 2024
Last Amended Date	December 2022

Documents/Guidelines

1 Dealing with Allegation and Suspicions

- 1.1 Reporting of Allegations
- 1.2 Referral of Allegation
- 1.3 Evaluation
- 1.4 Definitions

2 Planning for Success

- 2.1 Objectives
- 2.2 Conduct of investigation
- 2.3 Minimising Risks

3 Evidence

- 3.1 Types of Evidence
- 3.2 Sources of Evidence
- 3.3 Timing and Logistics
- 3.4 Use of Experts
- 3.5 Computer Resident Evidence
- 3.6 Other Considerations

4 Interviews

- 4.1 Consideration of Risks
- 4.2 Other Considerations
- 4.3 5 Phase of a Suspect Interview
- 4.4 Plan and Prepare
- 4.5 Engage and Explain
- 4.6 Account, Clarification and Challenge
- 4.7 Closure
- 4.8 Evaluation

5 Evaluation and Reporting

- 5.1 Evaluation of Evidence
- 5.2 Reporting

6 Loss Recovery

7 Appendix

- 7.1 Contact Name and Numbers
- 7.2 Interview Template

Reference: Code of conduct for Staff (available from the intranet)

1 Dealing with Allegation and Suspicions

1.1 Reporting of Allegations

In accordance with the Whistleblowing Policy approved by the Trust Board, allegations of fraud will be reported directly to the Principal

1.2 Referral of Allegation

The Principal should be informed of all allegations except in the case of the Principal or a Trustee.

The Principal will appoint a designated officer (DO) to investigate. If the allegation concerns a member of the Senior Leadership team then the Principal should be informed. If the allegation concerns the Principal or a Trustee then the Chair should be informed, and vice versa if the allegation concerns a Vice Principal/ Chief Financial Officer.

1.3 Evaluation

Evaluator (who may be a Designated Officer) to:

- Assess the credibility and the context in which allegations are made, or suspicions reported.
- Evaluate the quality and accuracy of evidence provided.
- Evaluate other potential sources of evidence such as financial information, analysis, internal audit reports and other inspections or reviews.

In Particular, the following factors should be considered:

1. Is there already an investigation into the same matter?
2. Has there been an investigation into the same matter in the immediate past?
3. Is it appropriate for the DO to investigate the referral? For example, does it concern a member of the Senior Leadership Team or are there potential HR implications? Should it be referred to the internal or external auditors or forensic accountants to investigate? Is legal advice needed?
4. Is supporting documentation available or is the allegation/suspicion based on hearsay evidence?
5. What is the quality and accuracy of evidence provided?
6. Are there other potential sources of evidence?
7. Has more than one person corroborated the allegation?
8. Is there any history of a bad relationship between the whistleblower and the accused?
9. Would the whistleblower gain in any way by action being taken against the accused?
10. Is it likely that all the relevant details of the allegations and that all allegations have been made known to you?
11. Is there a possibility of collusion between employees and third parties?

12. How serious are the implications of what you know currently if they were true?
13. Do you understand the potential risks if the choice was made not to fully investigate the allegation?

1.4 Definitions

This response plan should be followed in the event of both suspicions of fraud and thefts being disclosed. When evaluating such suspicions and deciding what action to take, the following definitions may assist:

Fraud is the intentional distortion of financial or other records by persons internal or external to the organisation which is carried out to conceal misappropriation of assets or otherwise for gain.

Fraud has two essential elements: deception or concealment; and deprivation or loss to the victim.

An example of internal fraud committed against The Sutton Academy would be a member of staff falsifying their expenses claim. An external fraud would include contractors overstating costs and submitting false invoices.

Theft is the dishonest misappropriation of property belonging to another with the intention of permanently depriving the other party. Theft does not necessarily involve deception or concealment.

Corruption is the offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person.

It may be that fraud has been committed in order to cover up a theft.

1.5 Decision:

After considering these issues and consulting with the Principal/Vice Principal, a decision should be made in conjunction with the Principal whether or not the allegation or suspicion should be investigated. If unsure, then the opinion of HR should be sought.

If it is decided to investigate the allegation then an investigation file should be assembled:

It should be borne in mind that taking the correct steps within the first 48 - 72 hours can often be crucial to the direction/success of an investigation.

2 Planning For Success

2.1 Objectives

2.1.1 Type of Action

To ensure a standard approach is taken across the organisation, the evaluator (who may be a Designated Officer) must consult with the Principal or Vice Principal when deciding what course of action the organisation may want to take depending on the possible outcome of the investigation, disciplinary, civil or criminal.

It is, of course possible for all three types of action to be taken, but the order in which this is done may be crucial to the success of the investigation.

A disciplinary case must be brought if The Sutton Academy concluded that there appeared to be evidence of a breach of procedures or of an employee's contract or breach of the Code of Conduct, and /or evidence of behaviour, which might justify a warning, or even a dismissal. The standard of evidence gathering would not need to comply with the Police and Criminal Evidence Act (PACE) but would need to follow civil evidence gathering rules.

It should be borne in mind that an employee who is the subject of a disciplinary hearing has a right of appeal which may result in an Industrial Tribunal, or in a Civil Court Hearing. The manner of gathering evidence, and the content of the evidence gathered is likely to be particularly important in such circumstances.

Civil action might be instigated by The Sutton Academy, if, for example there was a need to seek recovery of losses from a fraud. The Sutton Academy would have to bear the costs of such action (although, if successful, would typically be awarded a sum towards costs). The burden of proof in such an action is less than what is required in criminal proceedings. A judge would decide on the issues based on the balance of probability. Evidence would need to have been gathered in an appropriate way.

Criminal action results where a case is passed to the police for investigation (i.e. where a formal complaint is made) and they decide to investigate and bring criminal charges. In these circumstances any evidence which The Sutton Academy might hope could be admissible at trial would need to have been gathered in accordance with PACE.

Normally, companies and institutions gather e-evidence and documentary evidence to a criminal standard but interview evidence to a civil standard. This would result in the police needing to re-interview witnesses to a PACE standard. Typically, the Police would wish to re-interview in any event. The purpose of a criminal prosecution is primarily to secure a conviction not recovery.

In criminal proceedings, because the liberty and reputation of the defendant is at stake, a fact is only regarded by the Court as established if it has proved 'beyond reasonable doubt'.

The internal investigation may continue regardless of any criminal investigation but the DO may wish to seek external advice.

2.1.2 Procedure and Controls

The Evaluator should plan the investigation in such a way that control weaknesses which contributed to the alleged fraud are easily identified and reported on, with recommended improvements naturally flowing from this work.

2.1.3 Reporting to professional Bodies, Regulators and other Relevant Parties

In consultation with the Principal and Vice Principal, the evaluator should consider the need to inform some or all of the following:

- Chair of the Trust Board
- The appropriate Committee
- The Internal Auditors
- The external Auditors
- Others as appropriate e.g. The Education & Skills Funding Agency. Contact details can be obtained from the Principal

2.1.4 Minimise Publicity

The Evaluator should consider the impact the allegations will have on The Sutton Academy and individuals concerned if details become publicly known.

The Evaluator should check that a pro-forma press release exists or if there is nothing appropriate already in existence, then a press statement should be drafted in conjunction with the Sponsor. Depending on the facts, it may need to be tailored to the specific circumstances of the case.

Only the Principal is authorised to issue press statements externally, unless he has given specific responsibility to another person. If it is believed that the allegations have already been leaked, then the Principal should be promptly informed.

In the event that the allegations are leaked then all staff should be reminded to refer all calls about the incident directly to the Principal. **Failure to follow this instruction could lead to disciplinary action.**

2.2 Conduct of investigation

2.2.1 Investigation Team

In a normal investigation it would be expected that the team would be comprised of a DO appointed by the Principal to lead in house specialist in areas such as IT if appropriate, any other assistant considered necessary depending on the area being investigated, and appropriate external specialists possibly to cover selected specialist areas such as e-gathering, complex financial investigations etc.

Throughout the investigation the team leader should consult the Principal and Vice Principal who are also DO's.

2.2.2 Who to inform

The more people who know about the investigation the more likely it is that the allegation will be leaked and other suspects alerted. Hence it is imperative that knowledge of the investigation is limited to a need know basis. In the event of uncertainty, the Evaluator who will be the Designated Officer (DO) should consult with the Principal. It may be necessary to involve more people, if, for example, experts are required to access electronic data.

The timing of when other people are made aware of the investigation should also be considered. If there is no alternative than to inform other individuals, then this should be delayed for as long as possible and the importance of keeping the investigation confidential emphasised to them.

2.2.3 Reporting Line

Having established who needs to be informed of the investigation, the members and roles of the investigation team should be decided.

In any investigation it is vital that knowledge is shared quickly and effectively, hence the reporting lines within the team must be established at an early stage.

2.2.4 Co-ordination of Resources and Knowledge

The head of the investigation should consider how best to use the resources and knowledge at his/her disposal, e.g. Internal Audit, Human Resources, External Specialists and Senior Management.

2.2.5 HR issues and Expertise

The head of the investigation team should consult with the HR Officer if there is likely to be HR issues arising from the investigation, for example if interview is to be held, if disciplinary action might be taken or if there may be a need to interrogate data created by or which exists about the suspect.

2.2.6 External Expertise

In addition to external HR assistance, the investigation team should review their own skills and expertise and from this consider whether or not further external expertise is needed in areas such as IT evidence gathering, legal issues, accountancy knowledge, interviewing, document seizure etc.

If unsure, the team should consider their needs and skills base with experts at an early stage rather than being the investigation and then seek external help. If evidence is gathered in an inappropriate way, it can be completely useless in a potential civil or criminal case.

The head of the investigation team should decide whether, and if so when, the case should be reported to the Police. If it is to be reported, then the timing of such a report would need to be considered.

With Police involvement The Sutton Academy needs to balance the likelihood of a prosecution against the ability to mitigate losses and reputational damage.

It is important to bear in mind when making a decision on the timing of the police involvement that once the Police are informed and if they decide to investigate, they will seize such evidence as they consider appropriate, and it may then become difficult or impossible for The Sutton Academy to manage the direction, scope and timing of any investigation work of their own which they may wish to undertake. Furthermore, the Police are likely to be unable to share the results of their work with The Sutton Academy, since it would have been gathered under powers not available to the organisation. In addition, the Police would be seeking to gather evidence for the purpose of bringing criminal charge rather than to meet any other objectives which the academy might have.

Clearly in some circumstance the early involvement of the Police may be in The Sutton Academy interests. If in doubt on how to proceed, the DO's should seek external advice from a forensic accountant or lawyer experienced in such matters.

It is critically important to make an early and repeated assessment of the facts which are known with a view to establishing whether The Sutton Academy may have suffered a loss which, if prompt and appropriate steps are taken, may be partially or even wholly recoverable. Where a material loss is thought to be involved, early expert advice should be sought from a forensic accountant and lawyer.

2.3 Minimising Risks

2.3.1 Suspect's Authorities

To prevent the alleged fraud continuing, the loss of potential evidence or disruption to the running of The Sutton Academy, the investigation team should consider:

Include all or some of the following

- Authorised signatory
- Bank Mandate
- Access codes
- Keys (to cupboards, petty cash box, offices, building etc)
- Credit cards in the name of The Sutton Academy
- The Sutton Academy IT equipment's (at work and at home)
- Master copies of IT software
- Copyright documents
- Phones
- Petty cash

Expert HR advice should always be sought prior to taking such steps which typically would only be initiated in the event an individual is suspended. This may need considering in the event that the Investigation Team concludes that if the individual were to remain able to access The Sutton Academy's assets and records that this would pose an unacceptable risk of loss, concealment or damage.

2.3.2 Customers and Suppliers

In order to protect the organisation's contact with suppliers and customers, depending on the nature of the allegation, it may be necessary to provide some sort of explanation or agreed comments to third parties.

2.3.3 The Sutton Academy Reputation

In conjunction with 2.1.3 Reporting to Professional Bodies and Regulators and 2.1.4 Minimise publicity, one should also consider the potential damage to the organisation's reputation and ways in which this can be reduced.

3 Evidence

3.1 Types of Evidence

Evidence is material, which can be written, oral on video, disk or in other media, which can be used to prove a case.

It would include, but is not limited to, interviews with witnesses or suspects, computer and other e-evidence, paper records, discs, internal audit papers and documents held by third parties.

3.2 Sources of Evidence

In capturing relevant evidence, the investigation team must consider the following sources:

- The Sutton Academy
- Ex-employees
- Customers
- Suppliers
- Bank
- Internal Auditors
- Other third parties

If in doubt, guidance should first be sought from experts (forensic accountants/lawyers) before commencing the process of securing and gathering evidence.

3.3 Timing and Logistics

Consideration must be given as to the timing of the evidence capture and the way in which this is done. This is particularly relevant for the timing of interviews, i.e. if they are to be carried out at the start, during or at the end of the evidence gathering process. See section 4 for further information.

3.4 Use of Experts

The head of the investigation team should have already considered whether or not they have the necessary skills to download and review information from the organisation's IT system in such a manner that the integrity of the data will be maintained (simply opening an electronic file can render the information contained in it inadmissible as evidence in a civil or criminal case)

If these skills do not exist in-house then serious consideration must be given to bringing in external assistance.

3.5 Computer Resident Evidence

3.5.1 Securing

If it is suspected that computers may contain information pertinent to an enquiry then the following procedures should be followed.

- Identify all computers and storage media that may contain evidence including:
 - The suspect's desktop or laptop computer
 - The suspect's secretary's computer, if applicable
 - The suspect's electronic organiser or palmtop computer, if applicable
 - Server
 - Backup stores
 - Voicemail systems
 - USB Storage Devices
- Quarantine the above computers and media
 - Do not permit anyone to use the relevant computers
 - Disconnect the relevant computers from any network
 - Restrict remote access

- Consider the needs for court orders to preserve and secure the evidence on third party computers and storage media
- Remove the computer to a secure area
- Create evidentially sound copies of the relevant computers and storage media - it is probable that external Forensic IT assistance will be needed to do this in an evidentially acceptable manner.
- Once evidentially sound copies of the computers/e-evidence have been made, the computers may go back into circulation.

3.5.2 Investigation

In order to avoid damages to potential evidence that specialised procedures and equipment is be used to examine suspect computers. To enable this to be carried out efficiently it is useful to have as many of the following facts as possible.

Hardware

- Type of computer used
- Make and Model of the computer
- External disk drives in the computer
- Capacity of the internal hard disk
- Current BIOS password
- Way that the computer fits into the network
- Owner of the computer (e.g. the company, the user, etc)

Software

- Operating system (e.g. Windows)
- Application used on the computer (e.g. Microsoft)
- Where the applications and user generated files are stored (e.g. on the server)
- Whether the computer can be run without a network connection
- Any passwords used

User

- Computer literacy of the user (e.g. highly competent)
- Their knowledge of the situation (e.g. whether they know that they are under suspicion)
- Any other computer to which they have access (e.g. personal laptop)
- Access rights to various parts of any relevant networks (e.g. access only to departmental area on serve)
- Existence of a dedicated storage area on the server for the user

3.6 Other Considerations

- Do you know where relevant evidence may be held within The Sutton Academy? What consents may be needed to access/seize it in a controlled manner?
- What are the potential consequences for the investigation if information is lost or is deemed to have been tampered with - can it be obtained from other sources?
- What level and quality of evidence is required (e.g. for criminal action to be taken, the integrity of evidence needs to be 'beyond reasonable doubt')
- What is the cost/benefit of gathering more complete information?
- How can you best ensure that the evidence trail of information/documents obtained is maintained in a controlled manner?
- Should information be sought from suppliers, customers or ex-employees (given the effect on reputation and on-going relationships)?

The head of the investigation team should ensure that a systematic approach is taken to the collection and analysis of information. Potential evidence should be secured and catalogues, protecting its integrity so that it can later be relied on in the event of disciplinary, criminal or civil action. This will include taking the following action:

- Obtaining and securing relevant original documentation in an appropriate way;
- Restricting access to the original documentation to those on the investigation team;
- Logging the secured documentation in an appropriate format (e.g. database);
- Taking working copies of relevant documentation, so that the originals are not damaged or written on:

It is likely that analysis of documents and information will be required to identify patterns and connections. This may include the use of databases, charts and other IT investigation tools.

It may also be appropriate to obtain corporate intelligence to assist in identifying links between individuals/companies or in tracing the destination of assets. This may involve using publicly available data or specialist Corporate Intelligence assistance.

4 Interviews

4.1 Consideration of Risks

A whole range of people can provide useful information to the investigation. However, the investigation team should understand the risks involved in speaking to each

of these potential sources and determine how best to manage them - often determining the appropriate sequence in which to conduct the interviews can be important as it is often difficult to avoid interviewees sharing or discussing the subject matter of the investigation/evidence with other even though they are instructed/requested not to do so.

Key Risks attaching to different categories of interviewee include:

Interviewee	Risks
Accused	<ul style="list-style-type: none"> • Potentially untrustworthy; • Once aware of the investigation, action could be taken to destroy potential evidence/protect assets/obtain alibis.
Employee	<ul style="list-style-type: none"> • Effect on staff morale; • Loss of confidentiality.
Ex-Employee	<ul style="list-style-type: none"> • Loss of confidentiality; • Loss of reputation.
Supplier/Customer	<ul style="list-style-type: none"> • Loss of reputation.
Informant	<ul style="list-style-type: none"> • Potentially untrustworthy; • Problems with admissibility of evidence.

4.2 Other Considerations

When conducting interview, the following points should be considered:

- Individuals' rights under the Human Rights Act (e.g. right to have friend/lawyer present; appropriate breaks; interview being seen to be fair to the individual and properly conducted without being oppressive);
- Appropriate caution/warning to be given to interviewee (and whether the interview should be conducted under Police and Criminal Evidence Act procedures - expert guidance should be sought before attempting to do so);
- Always have two individuals undertaking the interviews;
- Consider method of recording evidence - tape, stenographer, handwritten notes;
- Consider preparing witness statement from notes for interviewee to sign.
- The use of open versus closed questions;
- To avoid future claims of having to lead the witness or suspect, use of questions starting with Who/What/Where/When/Why/How;
- The importance of listening;
- Summarise regularly;
- All handwritten notes should be retained as evidence for future use.

4.3 5 Phase of a Suspect Interview

- P Plan & Prepare
- E Engage & Explain
- A Account, Clarification and Challenge
- C Closure
- E Evaluation

4.4 Plan and Prepare

4.4.1 Considerations

- Offence - points to prove/possible defence/information to gather & to corroborate
- Person - name/gender/health/own solicitor/traumatic experiences
- Location - Size/Comfort/distractions/privacy/availability/security/access
- Time - Legal requirements/availability of interview room
- Role of interviews
- Prepare interview plan
- Exhibits and property
- Equipment - pens and paper/aide memoir/tape recorder

4.4.2 Tips

- Assume suspect will say nothing
- When starting the interview read from the aide memoir
- Be specific about the offence/allegation/concern/purpose
- Rights to seek legal advice
- If suspect is unsure if they need legal advice - suspend interview

4.4.3 Key things to remember

- You are not the judge and the jury merely an accumulator of information
- You cannot make people tell the truth
- You cannot change their attitude - but you can change your own
- Very little information is passed between two people shouting at each other
- It is not the questions that are important but the answers
- Summarise the discussion before moving onto new topic
- Actively listen, do not simply ask a series of questions
- Fairness - an interview conducted unfairly may not be admitted as evidence

4.5 Engage and Explain

Engage the interviewee in conversation by introducing yourself and any colleagues and then explaining:

- Reasons for the interview

- Routines that will be adopted
- Outline of the interview

4.6 Account, Clarification and Challenge

1. Prepare your agenda
2. Ask suspect for un-interrupted explanation of events
3. Split their explanation point by point and note down
4. Clarify each point with suspect
5. Challenge the suspect with the evidence (weakest challenge first) and any discrepancies in their account

4.7 Closure

Before closing, ask yourself:

- have you covered all your questions?
- has suspect provided all the information they are able and willing to provide?
- have you covered all of the aims of your interview? Do you believe you have understood what you have heard?

Then:

1. Summarise what's been covered
2. Maybe raise additional issues/back to account stage
3. Question from Interviewee?
4. See aide memoir re specific steps

4.8 Evaluation

After the interview, evaluate:

- information obtained
- Whole investigation in the light of the information obtained
- your performance

5 Evaluation and Reporting

5.1 Evaluation of Evidence

At this stage, you will need to assess:

- Extent to which full facts have been established
- Whether further action is required
- Size of any loss and prospects for recovery (by settlement or formal action)

- Whether criminal action (which would require reporting to the Police) should be taken
- What the chances are of civil action and asset tracing being successful
- Whether there are disciplinary reporting or case issues
- The possibility of similar frauds having happened in other departments/offices
- The possibility that this is an indicator of entrenched fraud
- The possibility of collusion between The Sutton Academy's employee and third parties, in which case should you inform relevant other senior individuals or your concerns
- The best way to handle publicity within and outside The Sutton Academy
- What changes in controls, personnel and accounting records are required
- How The Sutton Academy can learn from the fraud. For example, is there a need to raise awareness of reporting mechanisms, does fraud risk need to be given a higher profile?

5.2 Reporting

The report should cover the following areas:

- The nature of the fraud and how it has occurred;
- The quantum/size/scale of the fraud;
- Person(s) responsible;
- Supporting documentation/evidence;
- Likelihood of recovery of assets;
- Recommendations for improvements to controls/systems;
- The extent to which it is thought that the full extent of the "issues" have been established.
- Further action recommended (e.g. Utilisation of specialist investigation team to undertake further investigation; suspension/dismissal of individuals; reports to other bodies, such as Police, Regulations, etc).

The distribution of the report should be considered. Potential recipients could be:

- Police
- Internal Auditors
- External Auditors
- Trust Board
- Finance & HR Committee
- Relevant funding agency
- Insurance Company/Cyber Insurance

The Chief Financial Officer should ensure that the Register of Frauds and Malpractice is updated with all relevant details.

6 Loss Recovery

An assessment should be made as to the viability of recovering assets both at the planning stage of the investigation, during the investigation and once a conclusion has been drawn on the strength of the evidence of a fraud having been committed against the organisation.

Prompt and early action may sometimes be critical. If in doubt you should immediately consult forensic accountant or lawyer with expertise in such matters.

Key question that should be considered are:

- Will it be possible to define the financial loss that The Sutton Academy has suffered from the fraud?
- What are the chances of recovery? Will the individual be co-operative or will legal action be required? Has the individual either got the proceeds of the crime, or does he/she have other assets of value?
- What are the likely costs of successful asset tracing against realistic benefits?
- So you need specialist assistance to help you trace the assets?
- Does The Sutton Academy have a fidelity insurance policy and does the incident constitute a notifiable event (early notification is often a condition of such policies).

7 Appendix

7.1 Contact Name and Numbers

Name	Position	Telephone Number
Internal Auditors Haines Watts 168 Bath Street Glasgow G2 4TP	Melanie Bailey, Head of Academy Services	0161 926 8558
External Auditors Wylie & Bisset 168 Bath Street Glasgow G2 4TP	Scott Gillon	0141 566 7000
HR Solutions (GB) Ltd Nettleham House East Street Nettleham Lincoln LN2 2SL	Sarah Subden/ David Subden	01522 751999/ 0771 4140820
Eversheds Sutherland (International) LLP Bridgewater Place Water Lane Leeds LS11 5DR	Keith Froud	0207 497 9797
Police St Helens Police Station College Street St Helens Merseyside WA10 1TJ	n/a	0151 709 6010
Chair of Trustees Mr P Winter C/o The Sutton Academy Elton Head Road St Helens WA9 5AU	Clerk to the Trustees Mrs Marion Wood	01942 486269
Chair of Finance & HR Committee Mr G Pennington C/o The Sutton Academy Elton Head Road St Helens WA9 5AU	Clerk to the Trustees Mrs Marion Wood	01942 486269

7.2 Interview Template

Distractions	Can I ask you first to please turn off any mobile phone that you may have with you?
Letter	Did you receive a letter setting out the basis of the interview and your rights? This interview (is being recorded and it) is taking place in
Tapes (if applicable)	At the end of the interview I shall give you a notice explaining what will happen to the tapes.
Time	The time by my watch is.....
Date	The date is.....
Interviewer	I am..... And I am investigating this case for The Sutton Academy, my colleague is.....
Interviewee	Can you please state your name and current business address?
People	Do you agree that there are only these persons present in the room?
Friend	You are present at this interview not just as an observer, you should advise and observe whether or not this interview is being conducted properly and fairly and assist with communication for.....
Allegation	This interview concerns..... Do you understand this?
Status	You are free to leave at any time during the interview.

Legal	You may obtain legal advice at any time during the interview.
--------------	--

The interview template covering certain introductory remarks is illustrative only. Expert guidance should be sought when planning and conducting interviews.