



WHISTLEBLOWING POLICY AND PROCEDURES

Ratified by Full Governing Body 4 December 2019
Due for review December 2022

1. POLICY

1.1 Introduction

- 1.1.1** The staff and governors of St Peter's Catholic School ("The School") seek to run all aspects of the School's business and activity within legal requirements and regulations and expect all employees to co-operate in this by adhering to all laws, regulations, policies and procedures, and to act at all times with full regard for high standards of conduct and integrity. In the event that members of staff, parents, governors or the school community at large become aware of activities which give cause for concern, the School has established this Whistleblowing Policy. The Policy is intended to act as a framework to allow concerns to be raised confidentially and provides for a thorough and appropriate investigation of the matter to be carried out, causing the matter to come to an appropriate conclusion.
- 1.1.2** Throughout this Policy, the term "whistleblower" denotes the person raising the concern or making the complaint. It is not meant in a pejorative sense and is consistent with the terminology used by Lord Nolan as recommended in the Second Report of the Committee on Standards in Public Life: Local Spending Bodies, published in 1996.
- 1.1.3** The provisions of this Policy apply to matters of suspected fraud and impropriety and not matters of more general grievance, which would be dealt with under the School's Grievance Policy.

1.2 Purpose

- To encourage individuals to feel confident in raising serious concerns, to question and act upon their concerns about practice;
- To provide them with a method of raising concerns and receive feedback on how this is being followed up;
- To ensure whistleblowers receive a response to their concerns and they are aware of how to pursue them if they are not satisfied;
- To reassure employees that they will be protected from possible reprisals or victimisation if they have reasonable belief that they have made any disclosure in good faith.

1.3 Scope

- 1.3.1** The type of activity or behaviour which the School considers should be dealt with under this Policy includes:
- Manipulation of accounting records and finances
 - Inappropriate use of School assets or funds
 - Decision-making for personal gain
 - Health and safety risks including risks to employees, students and the public
 - Any criminal activity
 - Abuse of position
 - Fraud and deceit
 - Serious breaches of School policies which may advantage a particular party (for example tampering with tender documentation or a failure to disclose a personal interest)
 - Other unethical conduct.

1.4 Action the Whistleblower should take

- 1.4.1** The School encourages the whistleblower to raise the matter internally in the first instance. The School has designated two individuals to specifically deal with these matters and the whistleblower is invited to decide which of those individuals they are most comfortable raising the matter to. Designated individuals are (as at the date this Policy was reviewed):
- Headteacher
 - Vice Chair of Governors
- Contact details for the above individuals can be obtained from the Clerk to the Governing Body.
- 1.4.2** The whistleblower should raise the matter in person, by telephone or in a written form to one of the above named individuals. All matters will be treated in confidence and anonymity will be respected as far as possible. A record will be maintained of any concerns raised and the outcomes (in a form that protects confidentiality as far as possible) and will be reported as necessary to the Chair of Governors.

1.5 How the matter will be progressed

- 1.5.1** The individual in receipt of the information or allegation will carry out a preliminary investigation. This will seek to establish the facts of the matter and assess whether the concern has foundation and can be resolved internally. The initial assessments may identify the need to involve third parties to provide information, advice or assistance.
- 1.5.2** Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer, possibly in conjunction with the governing body, will consider how to report the findings and what corrective action needs to be taken. This may include disciplinary action and/or referrals to third parties such as the police, if appropriate.
- 1.5.3** The whistleblower will be informed of the results of the investigation in writing, including detail of any actions taken to address the issue, within ten working days of a concern being raised (where possible). Depending on the nature of the concern or allegation and whether or not it has been substantiated, the matter will be reported to the Governing Body.

- 1.5.4** If the whistleblower is not satisfied with the outcome, they may take the matter to the Chair of Governors if they have not already been involved. Alternatively, or if they remain dissatisfied after taking this step, they have the right to take the matter outside of the School. The following are possible contacts:
- The Ombudsman
 - The whistleblower's Trade Union
 - Citizen's Advice Bureau
 - Relevant professional bodies or regulatory organisations
 - The police
 - "Public Concern at Work", a voluntary organisation offering confidential legal advice to employees of any organisation. The service is offered free and they can assist in helping individuals to decide if and how to take a concern forward. Tel no: 020 7404 6609.

2. CONCERNS

2.2. Confidentiality

- 2.2.1.** All concerns will be treated in confidence and every effort will be made not to reveal employees' identities, if that is their wish. However, this cannot be guaranteed, if an external body, outside of the School's control, e.g. legal proceedings, considers the matter. The School will not tolerate any attempt to victimise the whistleblower or any attempt to prevent individuals from raising legitimate concerns.

2.3. Anonymous Allegations

- 2.3.1.** The School encourages employees to put their name to any allegation whenever possible.
- 2.3.2.** Concerns expressed anonymously are much less powerful but will be considered at the discretion of the School.
- 2.3.3.** In exercising its discretion the factors to be taken into account would include:
- The seriousness of the issues raised
 - The credibility of the concern
 - The likelihood of confirming the allegation from attributable sources.

2.4. Unfounded malicious concerns

- 2.4.1.** If any employee should raise malicious, unfounded concerns or attempts to make mischief (for example by raising such issues outside the School without justification), this will be taken seriously by the School and may constitute a disciplinary offence.