**St. Paul’s Catholic Primary School**

**Part of Bishop Bewick Catholic Education Trust**



**Growing in God’s Love to Be the Best We Can Be**

**WHISTLEBLOWING POLICY**



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| **Approved by:** | Local Governing Committee | **Date:** |
| **Last reviewed on:** | July 2023 | |
| **Next review due by:** |  | |

As a Catholic School we have the Catholic mission at the core of everything we do. Everyone in school is expected to actively follow and live out our mission statement: “Growing in God’s Love To Be The Best We Can Be.”

**1.Operational Summary**

**1.1Policy Aim:**

St. Paul’s Catholic Primary School insists on honesty, integrity, inclusion, diversity, equity and fairness in all aspects of its business and expects the highest standards of professionalism and ethical conduct to be maintained in all its activities. The school expects the same in its relationships with all employees.

The objectives of the Whistleblowing Policy are as follows:

* To encourage employees to report suspected wrongdoing as soon as possible, with the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be protected wherever possible.
* To provide employees with guidance on how to raise those concerns.
* To reassure employees that they are able to raise concerns in good faith without the fear of reprisals, even if they turn out to be mistaken.

All employees have a contractual right and duty to raise concerns they have with their employers about malpractice, service user safety, financial impropriety, bribery or any other serious risks they consider to be in the public interest. This policy has been developed to ensure that the school has a process for employees to raise concerns. It complies with the Public Interest Disclosures Act 1998 and has been impact assessed against the Equality Act 2010.

**1.2Policy Summary**

This policy gives an overview of Whistleblowing and public interest disclosure, a breakdown of responsibilities for members of staff and support available to making such disclosures.

**1.3What it means for staff**

Headteachers are responsible for ensuring adequate dissemination and implementation of policies. They are responsible for making employees aware of the existence of these procedures.

All employees are responsible for reading revised and new policies to maintain current awareness of changes which impact of their roles. All employees should work to create a culture of openness and accountability.

**2.Introduction**

The school welcomes suggestions from employees as to ways to ensure continuous development and improvement. There is an expectation that employees will report any concerns about possible bad practice. This will usually be facilitated through normal management arrangements, however, where that is not possible, this policy provides an avenue for reporting serious malpractice.

Employees are often the first to realise that there may be something seriously wrong within the school. However, in some cases they may not express concerns because they feel that speaking up would be disloyal. They may also fear harassment or victimisation. In line with school’s commitment to the highest possible standards of openness, integrity and accountability employees are encouraged to voice those concerns.

These procedures are in addition to the school’s complaints procedures.

**3.Scope of the policy**

This policy should be used where an employee has a genuine concern about suspected wrongdoing or dangers at work which may include:

(a) criminal activity;

(b) miscarriages of justice;

(c) danger to health and safety;

(d) damage to the environment;

(e) failure to comply with any legal or professional obligation or regulatory requirements;

(f) bribery;

(g) financial fraud or mismanagement;

(h) negligence;

(i) breach of our internal policies and procedures;

(j) conduct likely to damage our reputation;

(k) unauthorised disclosure of confidential information;

(l) public examination fraud;

(m) the deliberate concealment of any of the above matters.

Allegations of child abuse against teachers and other staff and volunteers are to be dealt with in accordance with Keeping Children Safe in Education statutory guidance for schools and colleges.

This policy should not be used for complaints relating to their own personal circumstances, such as ways they have been treated at work. In those cases they should use the appropriate Grievance Procedure.

**4.Safeguards**

4.1. Harassment or Victimisation

4.1.1. The school recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The school will not tolerate harassment or victimisation and will take action to protect an employee when they have a genuine concern.

4.1.2. This does not mean that if an employee is already the subject of internal procedures such as disciplinary or redundancy, that those procedures will be halted as a result of that employee/trainee raising a concern under the whistleblowing policy.

4.2. Confidentiality

4.2.1. The school will make every effort to protect an employee/trainee's identity if confidentiality is requested.

4.2.2. Should the investigation into the concern require the employee to be named as the source of the information, that this will be discussed with the employee before their name is disclosed.

4.2.3. An employee raising a concern should be aware that the need for confidentiality may prevent the school from giving them specific details of any necessary investigation or disciplinary action taken as a result.

4.3. Anonymous Allegations

4.3.1. Employees are encouraged to put their name to an allegation. Proper investigation may be more difficult or impossible if further information cannot be obtained and it is also more difficult to establish whether allegations are credible. Anonymous allegations will be considered at the discretion of the school. In exercising the discretion, the factors to be taken into account would include:

• the seriousness of the issues raised;

• the credibility of the concern; and

• the likelihood of confirming the allegation from attributable sources.

4.4. Untrue Allegations

4.4.1. If an employee makes an allegation where s/he has a genuine concern, but it is not confirmed by the investigation, no action will be taken against that employee. If, however, the school concludes that an employee/trainee has made malicious or vexatious allegations, or with a view to personal gain, disciplinary action may be taken against that employee.

4.5. Response to Allegations

4.5.1. Following investigation, allegations may be confirmed as unfounded. This outcome will be notified to the employee who raised the concern, who will be informed that the school deems the matter to be concluded and that it should not be raised again unless new evidence becomes available.

4.6. Support to Employee

4.6.1. It is recognised that raising concerns can be difficult and stressful. Advice and support will be made available, as appropriate, to both the employee raising the concerns and any employee subject to investigation.

**5.How to raise a concern**

5.1. As a first step, employees should normally raise concerns with a member of the Senior Leadership Team. Concerns can be raised verbally or in writing. Wherever possible concerns should be made in writing using the template in Appendix 1. If the concern is raised verbally, a written note will be taken using the template.

In some cases, employees may feel unable, or it may not be appropriate, to raise concerns with their immediate manager due to the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. In this case, the concern can be reported directly to the headteacher or the Chair of Governors.

5.2. In the event of an employee’s concern being about the Headteacher they should first approach the Chair of Governors, or if not deemed appropriate, the Chief Exectutive Officer of the Trust – Mrs Anita Bath – or the Chief Operating Officer – Mr David Douglass.

5.3. The earlier employees express the concern the easier it is to take action.

5.4. Unless criminal actions are suspected employees may invite their trade union representative or a work colleague or friend to be present during any meetings or interviews in connection with the concerns raised.

**6.Investigation and Outcome**

**The Procedure**

**6.1 Stage One:**

6.1.1. On receipt of a whistleblowing concern, the member of SLT will arrange a meeting with the employee who has raised the concern. At the initial meeting the HT should establish that:

• there is genuine cause and sufficient grounds for the concern; and

• the concern has been appropriately raised via the Whistleblowing Policy.

6.1.2. At the meeting, the HT should ask the employee to put their concern(s) in writing, if s/he has not already done so. If the employee is unable to do this the HT will take down a written summary of the employee’s concern(s) using the form in Appendix 1.

This should include:

• confirmation that the concern is being raised under the Whistleblowing Policy

• the background and history of the concerns; and

• names, dates and places (where possible); and

• the reasons why the employee is particularly concerned about the situation.

• be signed and dated where the employee is willing to do so.

**6.2 Stage Two:**

6.2.1. Following the initial meeting with the employee, the HT should determine whether an investigation is appropriate and, if so, what form it should take.

6.2.2. In some cases, it may be possible to resolve the concern(s) simply, by agreed action or an explanation regarding the concern(s), without the need for further investigation.

However, depending on the nature of the concern(s) it may be necessary for the concern(s) to:

• be investigated internally;

• be referred to the police;

• be referred to the external auditor;

• form the subject of an independent inquiry.

Advice and support will be sought from the Bishop Bewick Catholic Education Trust as appropriate.

**6.3 Stage Three:**

6.3.1. Within ten working days of a concern being received, the HT receiving the concern must write to the employee:

• acknowledging that the concern has been received;

• indicating how they propose to deal with the matter;

• giving an estimate of how long it will take to provide a final response; and/or • telling the employee whether any initial enquiries have been made; and

• telling the employee whether further investigations will take place, and if not why not; and/or

• letting the employee know when s/he will receive further details if the situation is not yet resolved.

**7. External Concerns**

7.1. The aim of this policy is to provide an internal mechanism for reporting, investigation and remedying any wrongdoing in the workplace. In most cases the employee should not find it necessary to alert anyone externally. The law recognises that in some circumstances it may be appropriate for the employee to report his/her concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media.

Employees are strongly encouraged to seek advice before reporting a concern to anyone external. If an employee is not satisfied with the school’s response, they are able to raise the matter with the Bishop Bewick Catholic Education Trust or externally:

• ‘Public Concern at Work’ Tel no: 0207 404 6609\*;

• Recognised Trade Union;

• External Auditor;

• Relevant professional bodies or regulatory organisations;

• Solicitor.

\*Public Concern at Work is a registered charity that Employees can contact for advice to assist them in raising concerns about poor practice at work. The charity also provides advice to employers as to the possible ways to address these concerns.

7.2. The employee should be aware that if s/he chooses to take a concern outside of the Trust, it is their responsibility to ensure that confidential information is not disclosed, i.e. confidential information, in whatever format, is not handed over to a third party.

7.3. Concerns about safeguarding practices can be raised externally using the NSPCC whistleblowing helpline. Employees can call 0800 028 0285 or email help@nspcc.org.uk

APPENDIX 1:

**PRIVATE AND CONFIDENTIAL**

**RAISING A CONCERN**

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| --- | --- | --- | --- |
| **To be completed by the person initially raising the concern and / or the manager to whom the concern was raised.** | | | |
| **Name of person raising concern:** | | |  |
| **Job Title:** | | |  |
| **Contact address / phone / email:** | | |  |
| **Relationship with subject of allegations:** | | |  |
| **Brief outline of concern / dates.**  **(outline the nature of concern providing details of suspected wrongdoing including name, job title, date, timescale, place and other relevant information)** | | | |
|  | | | |
| **Declaration (may be anonymous)** | | | |
| **Signature:** |  | | |
| **Print Name:** |  | | |
| **Date:** |  | | |
| **To be completed by the manager to whom the concern was raised:** | | | |
| **Name:** |  | | |
| **Job Title:** |  | | |
| **Phone / email:** |  | | |
| **Relationship with subject of allegations:** |  | | |
| **Additional information obtained from the person raising the concern to help clarify the nature of the concern, if applicable.** | | | |
| **Signature:** | |  | |
| **Print Name:** | |  | |
| **Date:** | |  | |