SAINT FRANCIS OF ASSISI CATHOLIC PRIMARY SCHOOL
Reporting Concerns at Work- Whistleblowing Policy
Reviewed March 2025
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1. POLICY STATEMENT

1.1 Saint Francis of Assisi Catholic Primary School is committed to achieving the highest standards of service, including honesty, openness and accountability. It recognises the hugely important role employees have in achieving that goal. The school will not tolerate any malpractice or wrongdoing in the administration and delivery of its services. The expectation is that employees will want to raise concerns they have about the way services are being provided, or about possible fraud, theft or corruption issues.

1.2 This Policy applies to all employees and officers of the school, and it is a fundamental requirement that staff are made aware of this policy. Other individuals performing functions in relation to school work, such as agency staff and contractors, are encouraged to use it.

1.3 It is essential to the business that any fraud, misconduct or wrongdoing by staff or officers is reported and adequately dealt with. We, therefore, encourage all individuals to raise any concerns that they may have about the conduct of others in the business or how the business is run. This Policy sets out how individuals may raise any concerns that they have and how those concerns will be dealt with.

1.4 This Policy is intended to encourage and enable staff to raise any concerns or suspicions without fear of recrimination. The school has introduced this Policy to enable any employee to report their concerns with confidence.

1.5 If something is troubling you, which you think we should know about, please use this procedure. If, however, you are aggrieved about your personal position, please use the available grievance procedures already in use in the school. These offer specific support and the means to take these issues forward. The concern reporting procedure is primarily for the expression of concerns where the interests of the school, its assets, service users or staff are at risk.

2. BACKGROUND

2.1 The law protects staff that raise legitimate concerns about specified matters.
These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach of any other legal obligation; or
- concealing information relating to any of the above;

is being, has been, or is likely to be, committed.

2.2 It is not necessary for the worker to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The worker has no responsibility for investigating the matter - it is the organisation's responsibility to ensure that an investigation takes place.

2.3 A worker who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised because he/she has made a disclosure.

2.4 The school encourages its staff to raise their concerns under this procedure in the first instance. If a worker is not sure whether or not to raise a concern, he/she should discuss the issue with his/her line manager or the HR department.

3. PRINCIPLES

3.1 Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Staff should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.

3.2 Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the worker who raised the issue as appropriate.

3.3 No member of staff will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training will not be prejudiced because he/she has raised a legitimate concern.

3.4 Victimisation of a member of staff for raising a qualified disclosure will be a disciplinary offence.

3.5 If misconduct is discovered as a result of any investigation under this procedure, the organisation's disciplinary procedure will be used, in addition to any appropriate external measures.

3.6 Maliciously making a false allegation is a disciplinary offence.

3.7 An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, staff should not agree to remain silent. They should report the matter to a director.

4. YOUR PROTECTION

4.1 The school is committed to this Policy. If you raise a qualified disclosure, you will be protected. We will not extend this assurance to someone who maliciously raises a matter they know to be untrue. Employees who knowingly make false accusations can expect to face appropriate disciplinary action.

4.2 The school will not tolerate the harassment or victimisation of anyone raising a genuine, qualified disclosure. However, we recognise that you may nonetheless want to raise a concern in confidence under this Policy. If you ask us to protect your identity by keeping your confidence, we will not disclose it without your consent. If the situation arises where we are not able to resolve the concern without revealing your identity (for instance, because your evidence is needed in court), we will discuss with you how we will proceed.

4.3 It should be noted that if you want to raise a concern in confidence, it may be more difficult for us to look into the matter or to protect your position. Investigations into anonymously raised concerns are likely to be limited by the sufficiency of the information provided. Anonymous referrals will be followed up at the discretion of the Executive Headteacher. In exercising that discretion, the factors that will be taken into account will include:

- The seriousness of the matters raised;
- The sufficiency and detail of information provided;
- The credibility of the concern; and
- The likelihood of confirming the allegation and obtaining further evidence from attributable sources.

5. REPORTING YOUR CONCERNS

5.1 As a first step, you should usually raise concerns with your immediate manager or their superior. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. If you feel management are in some way involved or are condoning the activity, you should approach Human Resources or the Director of Internal Audit, Fraud, Risk Management and Insurance.

- Director of HR and OD, Debbie Morris, 020 7361 2136
- Director of Audit, Fraud, Risk and Insurance, David Hughes, 07817 507695
- Alternatively, staff can report concerns via an independent, confidential hotline – Safecall - telephone: 0800 915 15714

5.2 The school is committed to tackling modern slavery and exploitation and we encourage you to report any concerns you identify. You can alternatively contact the Modern Slavery and Exploitation helpline on 080001217000.
5.3 All matters relating to items covered under the grievance procedures should be referred to Human Resources.

5.4 If the matter is related to fraud or corruption against the school, you should always immediately contact the Director of Audit, Fraud, Risk, and Insurance. Any approach will be treated with the strictest confidence.

5.5 The earlier you express the concern, the easier it is to take action. Although you are not expected to prove the truth of an allegation, you will need to demonstrate to the person contacted that there are sufficient grounds for your concern.

5.6 Once you have told us of your concern, we will review it to assess initially what action should be taken. This may involve an internal inquiry or a more formal investigation. We will tell you who is handling the matter, how you can contact him/her, and whether your further assistance may be needed. All issues relating to fraud will be investigated by the Director of Audit, Fraud, Risk and Insurance or the Head of Fraud.

5.7 The person undertaking the review is required to acknowledge your referral, and once the investigation is underway, they are expected to keep you aware of developments. However, they will not be able to tell you the precise action and the outcome taken where this would infringe a duty of confidence owed by the school to someone else.

5.8 If your concern is that your line manager is involved in the wrongdoing, has failed to make a proper investigation or has been unable to report the outcome of the inquiry, then action can be taken. The Director of Audit, Risk, Fraud and Insurance can review the investigation. They can make any necessary enquiries and make their report to Senior Management.

6. SAFEGUARDING

6.1 If you are concerned that a child or adult may be at risk of abuse, harm or neglect from either themselves, an individual or an organisation, please make contact with social services.

- Telephone: Adult Safeguarding helpline 02073613013 (office hours)/ 02073613013 (out of hours)
- Telephone: Child Safeguarding helpline: 02073613013 Out of hours Emergency Team: 02073732227

7. INDEPENDENT ADVICE

7.1 Although we would hope this Policy reassures you to report any concerns you may have through the internal channels, we recognise that there may be circumstances where you feel unable to follow this process and want external advice and support. This support is available from;

- Protect: Speak up, stop harm (www.protect-advice.org.uk). This is an independent charity which exists specifically to offer legal advice and assistance to employees with concerns.

- Trade Unions: employees may wish to be represented by or seek the advice of their staff representative when using the provisions of this Policy. The majority of Trade Unions have issued their guidance on reporting concerns, and the school endorses the trade union officers' role in this area. The principal staff side contacts are:

    - Unison: 08453550845
    - GMB: 02077365683

8. MORE INFORMATION

8.1 An eLearning course entitled RBKC Whistleblowing: Safe to speak is available through the Learning Zone to help employees understand when and why they should report concerns. The course also offers guidance in relation to the whistleblowing policy and the protection it provides.

8.2 For more further information regarding whistleblowing, please contact:

- Director of Audit, Fraud, Risk and Insurance: David Hughes, 07817 507695
- Head of Fraud: Andy Hyatt, 07739 313817