FEDERATION OF ST ANNE'S AND ST MARTIN'S CATHOLIC PRIMARY SCHOOLS

St Anne's and St Martins

Learning to live by faith and to be known by love

Whistleblowing Policy & Procedure

Policy Management

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What is Whistleblowing?

Whistleblowing encourages and enables you to raise serious concerns at St Anne's or St Martin's Catholic Primary School rather than overlooking a problem or blowing the whistle outside.

As someone who works for the School, you are often the first to realise that there may be something seriously wrong. However, you may not express your concerns because you feel that speaking up would be disloyal to your colleagues, or to the School. You may also be concerned that by speaking up you may risk losing your job or damaging your career.

This policy makes it clear that you can raise a matter of concern without fear of victimisation, subsequent discrimination or disadvantage.

It is in the interest of all concerned that disclosure of wrongdoing or irregularity is dealt with properly, quickly and discreetly. This includes the interests of the School, its employees, any persons who are the subject of any disclosure, as well as the person making the disclosure.

Who does it apply to?

- All employees of the School
- Contractors working for the School/Council on School premises, for example, agency workers, builders or drivers.
- Any suppliers and those providing services under a contract with the School in their own premises.
- Self-employed workers

Our Commitment

The School's Governing Body is committed to the highest possible standards of openness, honesty and accountability. In line with that commitment, you are encouraged, if you have serious concerns about any aspect of the School, to come forward and voice those concerns. It is recognised that certain cases will have to proceed on a confidential basis.

The policy has the support of the recognised trade unions.

What types of concern are covered?

Types of concern may be about, for example:

- Conduct which is a criminal offence or a breach of law.
- Suspected fraud or corruption
- Disclosures related to miscarriages of justice.
- Dangerous procedures or activities risking Health and Safety, including risks to the public as well as other employees.
- Discrimination or abuse on grounds of race, gender or disability or other protected characteristic.
- Damage to the environment.
- Breaches of established standards of good practice or agreed procedures

- The inappropriate use or breaches of the School's Standing Orders and financial procedures.
- Action which is contrary to the Code of Conduct for employees, or function or conduct of the Governing Body.
- Suspected sexual or physical or other abuse of clients, or
- Other unethical conduct.

Safeguards

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. If you believe what you are saying to be true, you should have nothing to fear because in reporting your concern you will be doing your duty to your employer and those for whom you are providing a service.

The School will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary, grievance, capability or other procedures that already affect you.

Confidentiality

The School will do its best to protect your identity when you raise a concern and do not want your name to be disclosed. It must be appreciated that the investigation process may reveal the source of the information and a statement by you may be required as part of the evidence. You will be given prior notice of this and a chance to discuss the consequences if these circumstances arise.

The confidentiality of service users will not be compromised as employees have a duty in law and with their professional codes of conduct to maintain this.

Support for Whistleblowers

Trade Unions

If you are a trade union member, you are encouraged to raise and discuss matters with your union representatives before seeking to invoke the Whistleblowing Policy. Trade unions can advise you whether or not to proceed and the best way to present your disclosure.

A trade union representative may also accompany or represent you at any meetings in connection with a disclosure under this Policy.

Human Resources (HR)

The School's Business Manager can be a person with whom you discuss how to make a disclosure and lodge a matter of concern (see below). Staff and non-employees will often discuss the issues that worry them with the Business Manager/HR in the first instance. Such discussions will be in confidence if that is

what you prefer, but there may be some disclosures (for instance criminal acts) that cannot remain confidential. However, you will be given time and space to explore your options to take matters forward.

Employee Assistance Programme (EAP)

Employees in Reading Borough Council maintained schools can contact the EAP (provided by Workplace Options) to discuss any concern you may have about work or your personal life, that is having an impact on you being able to carry out your work.

Although they offer a confidential counselling service, they are not able to make this unconditional confidentiality. They are bound by professional codes of ethics.

What is guaranteed, however, is that any matter that you discuss with them, will be given as much support, sensitivity and confidentiality as is possible. If for any reason, (and this will be on a very rare occasion), that the EAP feels that the information they have heard cannot remain confidential, (e.g. because of any third party involvement), then they will discuss this with you, and try to seek agreement on how to proceed with the matter.

The EAP is contactable (free of charge) by telephone 24 hours a day, 7 days a week on 0800 243 458 (minicom 020 8987 6574), email assistance@workplaceoptions.com. Support is also available online at www.workplaceoptions.com.

Anonymous Allegations

This policy encourages you to put your name to your allegation. Concerns expressed anonymously are much less powerful, but they 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
- the likelihood of confirming the allegation from attributable sources or factual records

Untrue Allegations

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, it is established that you have made malicious, frivolous or vexatious allegations, or for personal gain, disciplinary action may be taken against you. In such cases, the School's Disciplinary Policy will apply.

How to raise a concern

The earlier you express concern, the easier it is for someone to take action.

Concerns may be raised verbally or in writing. You should be prepared to set out the background and history of the concern, giving names, dates and places where possible and the reason why you are particularly concerned about the situation.

If you <u>are</u> an employee –

As a first step, you should normally raise concerns with your immediate manager or Headteacher, or you may wish to bring the matter to the attention of your trade union representative and request them to act for you. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, if you believe that management is involved, or if you feel that you have not received a satisfactory response to your concern, you should approach the Chair of the Governing Body or a member of the Governing Body.

You can also report the matter to Reading Borough Council by calling 0800 043 0699 (free phone), emailing Whistleblowing@reading.gov.uk.

If you are <u>not</u> an employee –

(e.g. agency staff, contractors etc) you can discuss your concerns with a relevant colleague or manager within the School. **Even though you may not be an employee, you are entitled to raise your concerns with** the Chair of the Governing Body or a member of the Governing Body**.** The same safeguards and regards for your protection will still apply under this policy.

Further **confidential** advice and guidance on how matters of concern may be pursued can be obtained from:

- Assistant Director of Legal and Democratic Services (The Monitoring Officer) X 72602
- Chief Auditor X 72695
- Assistant Director of HR & Organisational Development X 74697
- Executive Director of Resources (S151 Officer) X 74710

Because of the difficulty of raising a concern, you may ask your trade union or other representative to raise a matter on your behalf or ask them to accompany you to meet with your manager or other officer. You may also wish to consider speaking to a colleague who may have experienced the same concern.

How will the School respond

Acknowledgement

Receipt of your concern will be acknowledged immediately and, within five working days of the concern being received, the School will write to you:

- indicating how the matter will be dealt with;
- giving an estimate of how long it will take to provide a final response;
- telling you whether any initial enquiries have been made;
- supplying you with information on sources of support, and
- telling you whether further investigations will take place, and if not, why not.

Action under the Whistleblowing Policy

The action taken by the School will depend on the nature of the concern. The matters raised may be followed up in one of the following ways:

- be investigated internally by the management of the School (it must be emphasised that no-one who is the subject of a complaint or concern will be involved in the handling of it), internal audit or through disciplinary procedures;
- be referred to the police;
- be referred to the external auditor;
- be the subject of an independent enquiry.

In order to protect individuals and the School, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures, (for example, child protection or discrimination issues), will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action between the manager, individual and those whose actions had caused concern. If urgent action is required, this will be taken before any investigation is conducted.

Contact

The amount of contact between the people considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from you as part of the investigation process.

Attending Meetings

When any meeting is arranged, you have the right, if you so wish, to be accompanied by a trade union representative or a person of your choice who is not involved in the area of work to which the concern relates. This can be someone to provide you with support or act on your behalf during the meeting, but this person cannot be a legal adviser.

The School will take steps to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, the School will advise you about the procedure.

Outcome

The School accepts that you need to be assured that the matter has been properly addressed. Subject to legal constraints, you will receive information about the outcomes of any investigations, and the action that is to be taken. Also, if appropriate, changes which are to be made to monitor procedures to ensure that a similar concern is not raised in the future.

How the matter can be taken further

The School hopes you will be satisfied that any matter you raise has been considered properly. If you are not satisfied, and if you feel it is right to take the matter outside the School and/or Council, the following are possible contact points:

- the Local Government Ombudsman;
- the external auditor;
- relevant professional bodies or regulatory organisations (Government guidance, *Blowing the Whistle to a prescribed person: list of prescribed people and bodies*, is available on the GOV.UK website);
- the police.

If you do take the matter outside the School, you need to ensure that you do not disclose prohibited confidential information.