



## Corpus Christi Catholic Primary School

### Whistleblowing (Disclosure) Policy

*Joyfully, unique in Jesus' family, we learn to use our special gifts  
to love, serve and make the world a better place.*

Whistleblowing Policy			
<b>Approval</b>	Board of Governors	<b>Chair</b>	Anna Murphy-Sullivan
<b>Headteacher</b>	Simon Lennon	<b>Signature</b>	
<b>Date of last review</b>	April 2019	<b>Date of review</b>	June 2021
<b>Date of next review</b>	June 2024	<b>Maintenance</b>	SIPS Committee

## **Purpose**

The Governors and Headteacher of Corpus Christi Catholic School are committed to delivering a high quality education to our pupils and we expect high standards from our staff, visitors and contractors. In order to maintain those high standards a culture of openness and accountability is vitally important. The aims of this policy are threefold: -

- To encourage all staff to raise concerns about malpractice within the school without fear of reprisal.
- To reassure staff that concerns will be taken seriously.
- To provide information about how to raise concerns and explain how the Governors and the Local Authority (LA) will respond.

## **Scope of the Policy**

This policy applies to all school employees, agency staff, visitors and contractors engaged by the school.

## **What is whistleblowing?**

In practical terms, whistleblowing occurs when a concern is raised about danger, abuse or illegality that affects others. As the person blowing the whistle you will not necessarily be directly affected by the danger, abuse or illegality. Consequently you will not necessarily have a personal interest in the outcome of any investigation into your concerns. This is different from a complaint or grievance. If you make a complaint or lodge a grievance, you are saying that you personally have been poorly treated. This poor treatment could involve a breach of your individual employment rights or bullying and you are entitled to seek redress for yourself.

## **Blowing the Whistle on Malpractice**

Staff have individual responsibilities to bring matters of concern to the attention of the DSL / safeguarding team and/or external relevant agencies and, not to do so may result in charges of serious neglect on their part where the welfare of children may be at risk. Malpractice covers a wide range of concerns. The types of activity that should be disclosed include but are not limited to the following: -

- The physical, emotional or sexual abuse of pupils or staff.
- Inappropriate physical or emotional contact with pupils or staff that may be considered grooming or coercion.
- Financial maladministration.
- Unauthorised use of School funds.
- Fraud and corruption.
- Failure to comply with legal obligations.
- Endangering of an individual's health and safety.
- Damage to the environment.
- A criminal offence.
- Failure to follow financial and contract procedure rules.
- Showing undue favour to a contractor or a job applicant.
- Miscarriages of justice.
- Deliberate concealment of information relating to any of the above.

Staff should raise their concerns with the Headteacher as soon as any suspected malpractice becomes apparent. Remember that the earlier you raise concerns the easier it will be to take action. You (the whistleblower) are a witness to events, not a complainant and so you do not need to wait for proof of malpractice before raising concerns.

When reporting a concern you should provide as much information and detail as possible. In particular you should provide the full names of the people involved or who know about what is happening, dates of events and any relevant documentation. This will help the investigator to focus on the main issues quickly.

There will be some cases where it is not appropriate for you to raise concerns with your senior, for example where you suspect that she/he already knows about the malpractice and appears to be 'turning a blind eye', or where you suspect she/he may be involved. In circumstances where you do not think it is appropriate to report concerns to DSL then see 'Advice and Support' below.

Initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. You will be advised whether an investigation takes place or not. When making a decision the Headteacher or appropriate person will consider whether continuing with an investigation is in the public interest.

### **Advice and Support**

Any safeguarding concern related to the Headteacher should be reported to the local authority designated officer (LADO) on 01202 451451 and/or the Chair of Governors, via the email to Clerk of Governors. The School recognises that staff may wish to seek advice and support from their professional association or trade union before blowing the whistle and you are strongly advised to do so. They may also accompany you at any meetings. Employees may also wish to seek advice from 'Public Concern at Work (PCAW)', an organisation which is entirely separate from the school and the LA. PCAW have lawyers who provide confidential advice, free of charge, to people concerned about wrongdoing at work. They can be contacted by telephone on 020 7404 6609 or via e-mail on [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk). The NSPCC whistleblowing helpline is: [help@nspcc.org.uk](mailto:help@nspcc.org.uk) or call 0800 0280285.

### **Confidentiality**

The school understands that you may be reluctant to come forward with information about the wrongdoing of a colleague or manager or indeed at all. As such, the School recognises that whistleblowers may wish to raise concerns in confidence. If you (the whistleblower) make a request for the matter to be kept confidential then your identity will not be revealed without discussing the matter with you first. Any records will be kept confidentially and securely.

### **Anonymous Allegations**

You are encouraged to give your name when raising concerns. A concern expressed anonymously is much less powerful and is often more difficult to investigate. The decision whether to investigate an anonymous allegation will be made by the Headteacher and/ or the Chair of Governors and/or the LA. When making this decision they will take into account the seriousness of the issues raised, the credibility of what is being said and the likelihood of confirming the allegation from other sources.

### **Investigation Procedures**

All concerns raised under this procedure will be treated seriously and a decision made about whether or not an investigation is appropriate. Depending upon the nature of the matter it may be referred to external agencies such as Social Services or the police. The person to whom you reported your concern, will be responsible for keeping you informed about the progress of the investigation and the action, which has been taken, although you may not be told the outcome. In some cases the investigation may result in criminal or disciplinary proceedings. If this happens you may be invited to give a written statement or give evidence at a hearing. The Headteacher and Governors will support you in this process and ensure that you are clear about what will happen.

### **Protection for the Whistleblower**

The Headteacher, Governors and the LA will not tolerate harassment or victimisation and will take action to protect you if you have raised a concern in good faith. Any employee who is found to have victimised or harassed an employee who has raised a concern will face serious disciplinary action.

### **Allegations not made in Good Faith**

Concerns that are raised frivolously, maliciously, for personal gain or where they are known to be untrue may result in disciplinary action or, in the case of agency staff, the termination of the agency contract.

### **Blowing the Whistle Outside the School**

In certain circumstances it may be appropriate to raise concerns outside the school to the appropriate 'prescribed regulator'. This should only be done where you are raising a genuine concern in good faith and where you believe the information is true, i.e. more than just suspicion. You are advised to discuss your concerns with a legal advisor, professional association, trade union or PCAW (see above) before reporting them outside the School or LA.

As a last resort you may choose to raise your concern outside the School to someone other than a prescribed regulator, e.g. to the Police or your MP. You should only do this if, in addition to the conditions above, they meet one of three preconditions.

Provided the disclosure is reasonable in all the circumstances and is not made for personal gain, the preconditions are that you:

- reasonably believed that you would be victimised if you raised the matter internally within the school; or
- reasonably believed that the matter would be 'covered up' and there is no prescribed regulator; or
- you have already raised the matter internally or with a prescribed regulator.

### **Complaints and Grievances**

This policy should not be confused with other policies that exist for dealing with complaints or grievances. These other linked policies are available on demand.

### **Reviews and Operation of this Policy**

The Governors have overall responsibility for the operation of this policy. This policy has to be formally adopted by the Governors and may be reviewed from time to time. This policy was drawn from and was based on LA model policy guidance. In matters of this kind, the Headteacher and Governors will continue to work closely with our LA.