

St Catherine's Catholic Primary School

"Loving and Learning Together as Jesus taught us"



Whistleblowing Policy

Date of policy review: September 2026

Next review: September 2027

Policy Reviewed & Passed by the Governors

Key Person Responsible: Maureen Kelly

Introduction

St Catherine's Catholic Primary School is committed to conducting our business and activity with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

In the event that members of school staff or governors become aware of activities that give cause for concern, the following whistleblowing policy, or code of practice, acts as a framework to allow concerns to be raised confidentially and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion.

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

Throughout this policy, the term "whistleblower" denotes the person raising the concern or making the complaint. The school is committed to tackling fraud and other forms of malpractice or suspected wrongdoing and treats these issues seriously. It recognises that some concerns may be extremely sensitive and has therefore put in place a system that allows for the confidential raising of concerns within the school environment but also has recourse to an external party outside the management structure of the school. This policy is mandatory for London Borough of Barnet maintained schools under paragraph 11.9 of the Scheme for Financing Schools under S.48 of the Schools Standards & Framework Act 1998.

The school is committed to creating a climate of trust and openness so that a person who has a genuine concern or suspicion can raise the matter with full confidence that the matter will be considered and resolved appropriately.

The provisions of this policy apply to matters of financial mismanagement and impropriety and not matters of more general grievance, which would be dealt with under school grievance procedures.

This policy does not form any part of any employee's contract of employment and the school may amend it at any time.

The Scope of the Policy

This policy is applicable to the governors, all employees, officers, consultants, contractors, volunteers and agency workers of the school. The type of activity or behaviour, which is dealt with under this policy includes (but is not limited to):

- manipulation of accounting records and finances
- inappropriate use of school assets or funds
- decision-making for personal gain

- any criminal activity
- abuse of position
- fraud and deceit
- serious breaches of school procedures which may advantage a particular party (for example tampering with tender documentation, failure to register a personal interest)
- deliberate concealment of the above

Any reports of wrongdoing which are made in the public interest will gain the whistleblower the protection set out in this policy.

What action should the Whistleblower take?

The earlier a whistleblower expresses concern, the easier it is to take action.

The whistleblower is encouraged to raise the matter with their line manager in the first instance. This will allow school staff and governors in positions of responsibility and authority the opportunity to right the wrong and explain the behaviour or activity.

If the whistleblower would prefer not to raise the matter with their line manager for any reason, they should contact the Headteacher **or** the Chair of Governors.

The whistleblower may prefer to raise the matter in person, by telephone or in written form marked private and confidential and addressed to one of the above individuals. All matters should be treated in strict confidence and anonymity respected wherever possible. Contact details are at the end of this policy.

How will the matter be progressed?

The person notified of the matter (the investigating officer) will arrange a meeting with the whistleblower as soon as possible to discuss the whistleblower's concern. The whistleblower will not be required to prove their allegation but they will be asked to give as much detail as possible. The whistleblower may bring a colleague or union representative to any meetings under this policy. The whistleblowers companion must respect the confidentiality of the whistleblower's disclosure and any subsequent investigation.

The investigating officer 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 assessment may identify the need to involve third parties to provide further information, advice or assistance, for example involvement of other members of school staff, the legal department of the local authority, personnel or finance officers, the police.

Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer, who may act in conjunction with the governing body, will consider how best to report the findings and what corrective action needs to be taken if substantiated. This may include some form of disciplinary action or third-party referral such as the police.

The whistleblower will be informed of the outcome of the investigation when the matter is completed unless this is not possible for legal reasons. Sometimes this can take a long time, especially if there is a long investigation or court proceedings are involved.

Depending on the nature of the allegation and whether or not it has been substantiated, the matter may need be reported to the governing body and the local authority.

External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, the whistleblower should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for concerns to be reported to an external body such as the local authority. If that is the case and/or the whistleblower considers the matter too serious or sensitive to raise within the internal environment of the school, the matter should be directed to:

1. the **Council's Whistleblowing Team** who has powers to investigate all potential fraud or irregularity or
2. the **Council's Fraud hotline** for reports of fraud
3. the **Council's MASH Team** for concerns relating to the safeguarding of a child or young person
4. the **Council's Adult Social Care Team** for concerns relating to the safeguarding of an adult.

Contact details for these teams, as well as the local authority's whistleblowing helpline are at the end of this policy.

Respecting Confidentiality

The school aims to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if the concern turns out to be mistaken.

We hope that colleagues will feel able to voice whistleblowing concerns openly under this policy. Everything possible will be done to respect the whistleblowers confidentiality, if that is what the whistleblower wants. If a colleague wants to raise a confidential concern, the school will make every effort to keep their identity secret and only reveal it where necessary to those involved in investigating the concerns. Sometimes, it is necessary to take a statement as part of the investigation and enforcement process. In that case the issues will be discussed with the whistleblower beforehand.

Completely anonymous disclosures are difficult to investigate and can carry much less weight. Anonymous reports will only be acted upon at the discretion of the local authority, having regard to the seriousness of the issues, the credibility of the report and the likelihood of obtaining confirmation elsewhere.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If a whistleblower believes that they have suffered any such treatment, the whistleblower should inform the Headteacher **or** the Chair of Governors immediately.

Protection from reprisal

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. The Public Interest Disclosure Act 1998 gives statutory protection for employees who report in good faith on crime, illegality, or deliberate concealment of these. The protection covers reports to the employer or a regulating authority. The Act protects the employee from being subjected to discipline or dismissal or any other detriment on the grounds that they have disclosed information of the type outlined in this policy.

Any victimization or harassment of an employee who has made a protected disclosure will be treated as a serious disciplinary offence which could amount to gross misconduct and may lead to dismissal without notice. Individuals victimizing or harassing an employee who has made a protected disclosure can be personally liable in court for their actions.

If the whistleblower is already the subject of disciplinary, capability or redundancy procedure they will not necessarily be halted as a result of the whistleblowing.

No action will be taken against any person if a report has been made but is not confirmed by the investigation.

Raising unfounded malicious concerns

Individuals are encouraged to come forward in good faith with genuine concerns with the knowledge they will be taken seriously. If an individual makes a report which they do not reasonably believe to be true, makes false allegations maliciously or with a view to personal gain this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances, such as a withdrawal from the school premises, an injunction or a report to the police.

If the whistleblower is not satisfied

If the whistleblower is not satisfied with the whistleblowing report provided by the school, they can contact the Council's Whistleblowing Officer.

If the whistleblower is not satisfied with the whistleblowing report provided by the Council's Whistleblowing Officer, the whistleblower can contact the Chief Finance Officer or the Chief Executive, both of whom have personal responsibility for probity within the Council.

Conclusion

The school hopes that the whistleblower will be satisfied with the whistleblowing routes offered by this policy. But if they are not and the whistleblower wants to take the matter

up outside the Council, the whistleblower can contact their ward Councillor (if the whistleblower lives in the borough), the external auditor, the Department for Education & Skills, or the police, or take legal advice. If the whistleblower does this, they should make sure that they do not put themselves at legal risk by disclosing confidential information in circumstances where that is not allowed. The whistleblower should ask the person they contact about this.

Existing good practice within schools in terms of systems of internal control both financial and non-financial and the external regulatory environment in which schools operate ensure that cases of suspected fraud or impropriety rarely occur. This whistleblowing policy is provided as a reference document to establish a framework within which issues can be raised confidentially internally and if necessary outside the management structure of the school. This document demonstrates the school's commitment that concerns are taken seriously and action will be taken.

Contacts

Headteacher	Maureen Kelly
Chair of Governors	Alessia Errico
Barnet Council Whistleblowing Team	020 8359 6123 whistleblowing@barnet.gov.uk
Fraud Reporting Hotline	020 8359 2007 www.barnet.gov.uk/anti-fraud
MASH Team (Safeguarding Children and Young People)	020 8359 4066 (Emergency Out of Hours Team 020 8359 2000)
Adult Social Care (Safeguarding Adults)	020 8359 5000 (Out of hours 020 8359 2000) socialcaredirect@barnet.gov.uk
Workers and members of the public have the option to contact Protect, the whistleblowing charity, for advice and support	020 3117 2520 www.protect-advice.org.uk

Monitoring and Review

The Governing Body will review this policy annually ensuring that all procedures are up to date. Any changes to this policy will be communicated to all members of staff.