



# **WHISTLEBLOWING POLICY**

## **Championing Standards**

### **St John's Catholic Comprehensive School**



*Excellence for All  
Service to Others  
Inspired by Christ*

*This Policy was adopted by the Full Governing Body*

*Owner: Dan Walton  
Quality Assured: James Steadman*

*Date: September 2023*

*Next Review date September 2026*

## **Introduction**

The staff and governors of St. John's Catholic Comprehensive School seek to run all aspects of school business and activity with full regard for high standards of conduct and integrity. In the event that members of school staff, parents, governors or the school community at large become aware of activities which give cause for concern, the school has established the following whistleblowing policy, or code of practice, which acts as a framework to allow concern to be raised confidentially and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion.

Throughout this policy, the term *whistleblower* denotes the person raising the concern or making the complaint. It is not meant in a pejorative sense and is entirely consistent with the terminology used by Lord Nolan as recommended in the *Second Report of the Committee on Standards in Public Life: Local Spending Bodies* published in May 1996.

St. John's also sees the role of the '*whistleblower*' as a person(s) keen to raise standards and champion improvements resulting in a better and safer environment for all of our young people.

The school is committed to tackling fraud and other forms of malpractice and treats these issues seriously. The school recognises that some concerns may be extremely sensitive and has therefore developed a system which 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.

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 appropriately considered and resolved.

The provision of this policy applies predominantly to matters of suspected fraud and impropriety.

Procedures for reporting Allegations of abuse against staff (both concerns or allegations that may meet the harm threshold and concerns or allegations that do not meet the harm threshold, referred to as "low level concerns") are detailed in the allegations of abuse against staff policy.

Procedures for reporting matters of more general grievance are detailed in the school's grievance policy.

## **When might the whistleblowing policy apply?**

The type of activity or behaviour which the school considers should be dealt with under this policy includes (but are 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)
- Inappropriate behaviour of any employee of St. Johns
- Student or staff health and safety being put in danger

### **What action should the *whistleblower* take?**

The school encourages the *whistleblower* to raise the matter internally in the first instance.

Concerns or allegations should be raised with the Headteacher (or the Associate Headteacher in the Headteacher's absence, or with the DSL in the absence of both the Headteacher and the Associate Headteacher). Any concerns reported to the DSL will be shared with the Headteacher (or the Associate Headteacher in the Headteacher's absence).

In the event of the concern or allegation being made against the Headteacher (or the Associate Headteacher in the Headteacher's absence, or the DSL in the absence of both the Headteacher and the Associate Headteacher), the concern should be reported to the Chair of Governors.

Wherever possible, the school seeks to respect the confidentiality and anonymity of the *whistleblower*.

If the whistleblower feels that their concern or allegation is too serious or sensitive to be raised internally, and the concern or allegation relates to suspected fraud and impropriety, it should be directed to:

Jonathan Idle  
Head of Internal Audit - KCC  
Tel No: 03000 417840  
email: [Jonathan.Idle@kent.gov.uk](mailto:Jonathan.Idle@kent.gov.uk)

Kent County Council has its own procedures for dealing with such matters and will ensure every effort to respect the confidentiality of the *whistleblower*. Kent County Council will ensure relevant officers of the Department for Education and Standards are informed as appropriate.

Alternatively, if the concern or allegation relates to the safety of a child and the *whistleblower* does not feel able to raise concerns regarding child protection failures internally, they should report the concern or allegation to the NSPCC whistleblowing helpline

- 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

In addition, information and advice can be obtained from the charity Protect (formerly Public Concern at Work). This charity offers free legal advice in certain circumstances to people concerned about serious malpractice at work. Their literature states that matters are handled in strict confidence and without obligation. Contact can be made online at <https://protect-advice.org.uk/contact-protect-advice-line>

### **How will the matter be progressed?**

The individual(s) in receipt of the information or allegation (the Investigating Officer(s)), will carry out, or sanction the carrying out, of a preliminary investigation by a suitably senior member of staff or Governor. 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, legal or personnel advisors, the police, the Department for Education and Standards, Kent County Council.

Records will be kept of work undertaken and actions taken throughout the investigation. The Investigating Officer(s), possibly in conjunction with the Governing Body, will consider how best to report the findings and what corrective action needs to be taken. This may involve some form of disciplinary action or third party referral such as the police.

Following the investigation, feedback will be provided to the whistleblower, within the confines of the school's internal policies and procedures. Depending on the nature of the concern or allegation and whether or not it has been substantiated, the matter will be reported to the Governing Body.

If the *whistleblower* is dissatisfied with the conduct of the investigation or resolution of the matter or has genuine concerns that the matter has not been handled appropriately, the concerns should be raised with the Investigating Officer(s), and/or the Governing Body. If the whistleblower remains dissatisfied after this stage, the matter should be raised with the relevant external party that is detailed on the previous page of this policy (Jonathan Idle, KCC / NSPCC)

### **Respecting confidentiality**

Wherever possible, the school seeks to respect the confidentiality and anonymity of the *whistleblower* and will, as far as possible, protect him/her from reprisals. The school will not tolerate any attempt to victimise the *whistleblower* or attempts to prevent concerns being raised and will consider any necessary disciplinary or corrective action appropriate to the circumstances.

### **Raising unfounded malicious concerns**

Individuals are encouraged to come forward in good faith with genuine concerns with the knowledge that they will be taken seriously. If individuals raise malicious unfounded concerns or attempt to make mischief, this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances.

### **Conclusion**

Existing good practice within the school in terms of its systems of internal control both financial and non-financial and the external regulatory environment in which the school operates 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 is a public commitment that concerns are taken seriously and will be actioned.