# Whistleblowing Policy – St Peter's CE Primary School

## Introduction

*All of us at one time or another experience concerns about what is happening at work.*

*Usually these are easily resolved. However, when the concern feels serious because it is about a possible fraud, danger or malpractice that might affect others or the organisation itself, it can be difficult to know what to do.*

You may be worried about raising such a concern and may think it best to keep it to yourself, perhaps feeling it's none of your business, that it's just a suspicion, or is only something that might happen. You may feel that raising the matter would be disloyal to colleagues, managers or to the school. You may decide to say something but find that you have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.

The Headteacher and Governors of this school are committed to running the school in the best way possible and to do so need your help. This policy has been introduced to reassure you that it is safe and acceptable to speak up and to enable you to raise any concern you may have about malpractice at an early stage and in the right way.

This policy applies to all those who work for us; whether full-time or part-time, employed through an agency or as a volunteer. If you have a whistleblowing concern, please let us know.

This Whistleblowing Policy is primarily for concerns where the public interest is at risk, which includes a risk to the wider public, customers, workforce or the council itself. If something is troubling you that you think we should know about or look into, please use this policy.

There are, however, certain common incidents where this policy is not the correct course of action, as follows:

- if you are a member of the workforce and you wish to make a complaint about your employment or how you have been treated, please use the grievance procedure
- if you are a member of the public and are dissatisfied with a service received or would like to complain about a matter relating to the school, please use our complaints procedure
- if you have a safeguarding concern regarding a child, please refer to the school's Safeguarding Policy and speak to the designated safeguarding lead – the headteacher.

**If in doubt - raise it**

# Our assurances to you

## Your safety

The Headteacher and Governors are committed to this policy. Provided you are raising a genuine concern, it does not matter if you are mistaken.

Of course, we do not extend this assurance to someone who maliciously raises a matter they know is untrue. If individuals are found to have made malicious or vexatious allegations, disciplinary action may be taken.

If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any form of reprisal as a result. The harassment or victimisation of anyone raising a genuine concern will be viewed as a disciplinary matter.

The Public Interest Disclosure Act 1988, known as the "Whistleblowing Act" provides protection for workers against detrimental treatment or dismissal for disclosing information because they reasonably believe it is in the public interest to do so, specifically in relation to:

- a criminal offence that has, is being, or is likely to be committed
- financial fraud or mismanagement
- miscarriages of justice
- danger to health and safety
- damage to the environment
- failure to comply with any legal obligation or regulatory requirements
- the deliberate concealment of any of the above matters
- Child Protection /Safeguarding concerns - Safeguarding concerns are taken very seriously. Salford Safeguarding Children Partnership have developed an escalation policy which compliments this whistleblowing policy which can be accessed below. Accessing the escalation policy does not prevent you from raising a whistleblowing concern where you have genuine concerns about practices.

  Escalation Policy 2020

Whilst not within the scope of the Act, individuals not employed by the school, for example those providing contracted services or volunteering, may also raise concerns under this policy.

## Your confidence

With these assurances, we hope you will raise your concern openly. However, we recognise that there may be circumstances when you would prefer to speak to someone confidentially first. If this is the case, please say so at the outset.

If you ask us not to disclose your identity, we will not do so without your consent unless required by law. You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In such instances, we will discuss with you whether and how the matter can best proceed.

Please remember that if you do not tell us who you are (and therefore you are raising a concern anonymously) it will be much more difficult for us to look into the matter. We will not be able to protect your position or to give you feedback. Accordingly, you should not assume we can provide the assurances we offer in the same way if you report a concern anonymously.

## How to raise a concern internally

Please remember that you do not need to have firm evidence of malpractice before raising a concern. However, we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

## Step one – Your line manager or Headteacher

If you have a concern about malpractice, we hope you will feel able to raise it first with your line manager, or Headteacher. This may be done verbally or in writing.

## Step two – Your named Governor

If you feel unable to raise the matter with your manager, for whatever reason, please raise the matter with the named Governor: Mr David Berry, 0161 794 2616.

## Step three – Salford City Council's internal audit team

If you feel unable to raise the matter as described above for whatever reason, please raise the matter with the local authority's internal audit team by:

- telephoning the confidential hotline (answerphone) on 0808 100 1235 or Internal Audit on 0161 607 6969
- completing the online form or email audit@salford.gov.uk
- writing to the Internal Audit Manager, Internal Audit Services, 3rd floor, Salford Civic Centre, Swinton, M27 5AW

Internal Audit have been given special responsibility in dealing with whistleblowing concerns.

If you want to raise the matter confidentially, please say so at the outset so that appropriate arrangements can be made.

## Step four – Salford City Council's Management

If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, please contact the council's:

- Assistant Director (Education Work and Skills)
- Monitoring Officer (Assistant Director Legal & Governance)
- Chief Finance Officer (Assistant Director Finance)
- Chief Executive.

## Money laundering

If you think your concern may relate to money laundering, please read the council's anti-money laundering procedures as there are specific legal responsibilities and requirements.

Money Laundering is a criminal offence that involves turning the proceeds of criminal activity into apparently 'innocent' funds with no obvious link to its criminal origins.

Where you know or suspect that money laundering activity is taking or has taken place, you must disclose this as soon as practicable to the council's Local Authority's Money Laundering Reporting Officer (Head of Internal Audit or Internal Audit Manager). The disclosure should be made within 'hours' of the information coming to your attention. Should you not do so, then you may be liable for prosecution.

At no time and under no circumstances should you voice any suspicions to the person(s) whom you suspect of money laundering, otherwise you may commit a criminal offence.

## How we will handle the matter

We will acknowledge receipt of your concern within 10 days. We will assess it and consider what action may be appropriate. This may involve an informal review, an internal inquiry or a more formal investigation.

Concerns or allegations that legally fall within the scope of other organisations (for example, the police, Ofsted, and the Care Quality Commission) will be referred onward.

We will tell you who will be handling the matter, how you can contact them, and what further assistance we may need from you. If you ask, we will write to you summarising your concern and setting out how we propose to handle it and provide a timetable for feedback. If we have misunderstood the concern or there is any information missing, please let us know.

When you raise the concern, it will be helpful to know how you think the matter might best be resolved. If you have any personal interest in the matter, we do ask that you tell us at the outset. If we think your concern falls more properly within the grievance or other relevant procedure, we will let you know.

Whenever possible, we will give you feedback on the outcome of any investigation. Please note, however, that we may not be able to tell you about the precise actions we take where this would infringe a duty of confidence we owe to another person.

While we cannot guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly and properly. By using this policy you will help us to achieve this.

If an employee is required to give evidence in criminal or disciplinary proceedings, we will advise them about the procedure and offer the appropriate level of support.

If at any stage you experience reprisal, harassment or victimisation for raising a genuine concern, please contact the Headteacher or Chair of Governors.

## Independent advice

If you are unsure whether to use this policy or you want confidential advice at any stage, you may contact the independent charity Protect (formerly known as Public Concern at Work) on 020 3117 2520 (* option 1) or by email at whistle@protect-advice.org.uk. They can talk you through your options and help you raise a concern about malpractice at work. You can also contact your union for advice.

## External contacts

While we hope this policy gives you the reassurance you need to raise your concern internally with us, we recognise that there may be circumstances where you can properly report a concern to an outside body. If so, we would rather you raised a matter with the appropriate prescribed people and bodies than not at all.

The Government have provided a list of prescribed people and bodies that can be contacted. These are mainly regulatory bodies, for example Ofsted, Care Quality Commission, Health and Safety Executive, but also include Salford Council's external auditors, Mazars (contact: Karen Murray, Director Mazars LLP, One St Peter's Square, Manchester, M2 3DE).

If you do take the matter outside the school or council, you need to ensure that you do not disclose confidential information except to those included in the list of prescribed people and bodies.

If you report a concern to the media or otherwise fail to go through appropriate channels, in most cases you will lose your right to protection under the Public Interest Disclosure Act and could potentially face disciplinary action.

The law is complex in this area. If there is any doubt about which route to take, it is recommended that the prescribed person, Protect, or your union be contacted first for initial advice (only disclosing such details as are required to enable them to provide that advice, and on the basis that such disclosures are treated as confidential).

## Monitoring / oversight

The school's governing board has overall responsibility for the maintenance and operation of this policy and maintains records of concerns raised and the outcomes.

Policy approved and adopted by the full governing board on: Monday, 6th November, 2023

Review date: Autumn Term, 2024

Signed: *J P Sheehy* (Fr Jeremy Sheehy – Chair)