

**St. Bartholomew's C of E Primary School  
Sydenham**



## **Whistle-Blowing Policy**

Agreed by the Governing Body: December 2017

Scheduled Review Date: December 2018

### Introduction

1. The staff and Governors of St Bartholomew's School seek to run all aspects of school business and activity with full regard for high standards of openness, probity, conduct, integrity and accountability.
2. 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, St Bartholomew's School has established the following Whistle Blowing Policy which 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.
3. 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.

### Aims

4. St Bartholomew's School is committed to tackling fraud, other forms of malpractice, radicalisation and extremism and treats these issues seriously. St Bartholomew's 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.
5. St Bartholomew's 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 provisions of this policy apply to matters of suspected fraud or impropriety and not matters of more general grievance which would be dealt with under the school's grievance procedures.
6. Existing good practice within St Bartholomew's 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.
7. This Whistle Blowing 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.

### Applying the Whistle Blowing Policy

8. The type of activity or behaviour which St Bartholomew's School considers should be dealt with under this policy includes:
  - 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)
- use of extremist or 'hate' terms to exclude others or incite violence
- intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour, culture or faith
- attempts to impose extremist views or practices on others or
- anti-Western or anti-British views.

### Action the Whistleblower Should Take

9. St Bartholomew's School encourages the *whistleblower* to raise the matter internally in the first instance to allow those school staff and Governors in positions of responsibility and authority the opportunity to right a wrong and give an explanation for the behaviour or activity.
10. St Bartholomew's School has designated a number of individuals to specifically deal with such matters and the whistleblower is invited to decide which of those individuals would be the most appropriate person to deal with the matter.
  - Sara Davies, Headteacher
  - Cathryn Johnston, Designated Safeguarding Lead
  - Ros Sutton, Chair of Governors
11. 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 named individuals. All matters will be treated in strict confidence and anonymity will be respected wherever possible.
12. Alternatively if the *whistleblower* considers the matter too serious or sensitive to raise within the internal environment of the school, the matter should be directed in the first instance to the LA's Head of Audit & Risk, 020 8314 6000. The LA has its own procedures for dealing with such matters and will ensure every effort to respect the confidentiality of the *whistleblower*.
13. The LA will ensure relevant officers of the Department for Education are informed as appropriate. In addition, information and advice can be obtained from the charity 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 details for the charity are as follows:
  - a. **Public Concern at Work**  
3rd Floor, Bank Chambers, 6 - 10 Borough High Street, London SE1 9QQ
  - b. **Telephone**  
Whistleblowing Advice Line: 020 7404 6609  
General enquiries: 020 3117 2520 / Fax - 020 74038823
  - c. **Email**  
UK enquiries: [whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk)  
UK helpline: [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk)  
UK services: [services@pcaw.co.uk](mailto:services@pcaw.co.uk)

**How the Matter Will Be Progressed**

14. The individual(s) in receipt of the information or allegation [the investigating officer(s)] 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, legal or personnel advisors, the police, the Department for Education, the LA. Records will be kept of work undertaken and actions taken throughout the investigation.
15. 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 include some form of disciplinary action or third party referral such as the police.
16. The *whistleblower* will be informed of the results of the investigation and the action taken to address the matter. 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 and the LA.
17. 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), the Governing Body and/or directed to the LA.

**Respecting Confidentiality**

18. Wherever possible St Bartholomew's School seeks to respect the confidentiality and anonymity of the *whistleblower* and will as far as possible protect him/her from reprisals.
19. St Bartholomew's 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**

20. Individuals are encouraged to come forward in good faith with genuine concerns with the knowledge 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.

**Monitoring and Review**

21. This policy is monitored regularly by the Headteacher and Senior Management Team, who report to Governors on request about the effectiveness of the policy.
22. This policy will be reviewed in two years, or earlier if necessary.