



ST DUNSTAN'S, CHEAM, C of E PRIMARY SCHOOL

Policy Subject: Whistleblowing

Date: FEBRUARY 2020

Review Date: FEBRUARY 2022

Vision Statement

'St Dunstan's – a thriving Christian school, guided by the Good Shepherd, founded on faith, inspiring the best in everyone.'

For all members of our school family we celebrate:

- excellent achievement and progress in all that we do
- learning for life in all its fullness
- Christian values alive within our school
- being at the heart of our community

Policy Statement:

WHISTLEBLOWING

Introduction

The staff and governors of St Dunstan's Primary 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, St Dunstan's Primary School has established the following code of practice 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. This policy relates to the financial aspect of the school. Other policies deal with other aspects of school life e.g. Child Protection.

Throughout the policy the term 'whistleblower' denotes the person raising the concern.
[Public Interest Disclosure Act 1998](#) and the [government guidance on whistle-blowing](#).

St Dunstan's is committed to tackling fraud and other forms of malpractice and treats these issues seriously, as well as ensuring safeguarding systems are rigorous and thorough. St Dunstan's 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.

St Dunstan's 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.

Staff must acknowledge their individual responsibility to bring matters of concern to the attention of senior management and/or relevant agencies. Although this can be difficult this is particularly important where the welfare of children may be at risk. You may be the first to recognise that something is wrong but may not feel able to express your concerns out of a feeling that this would be disloyal to colleagues or you may fear harassment or victimisation. These feelings, however natural, must never result in a child or young person continuing to be unnecessarily at risk. Remember it is often the most vulnerable children or young people who are targeted. These children need someone like you to safeguard their welfare.

Don't think 'what if I'm wrong?' - think 'what if I'm right?'

The provisions of this policy apply to matters of suspected fraud, impropriety and safeguarding, not matters of more general grievance, which would be dealt with under the school's grievance procedures and the Complaint Policy.

A whistleblower is a person who raises a genuine concern relating to the above.

When might the whistle blowing policy apply?

The type of activity or behaviour that St Dunstan's considers should be dealt with under this policy includes:

- manipulation of accounting records and finances;
- safeguarding issues with regard to children;
- Breaches of financial management procedures
- Pupils' or staff' health and safety being put in danger
- decision-making for personal gain;
- any criminal activity;
- abuse of position;
- fraud and deceit;
- breaches of any statutory code of practice;
- discrimination in employment or the provision of education;
- serious breaches of school procedures which may advantage a particular party (for example, tampering with tender documentation, failure to register a personal interest).
- Attempts to cover up the above, or any other wrong doing in the public interest

Reasons for whistle blowing

- Each individual has a responsibility for raising concerns about unacceptable practice or behaviour

- To prevent the problem worsening or widening
 - To protect or reduce risks to others
 - To prevent becoming implicated yourself
 - Protect (formerly Public Concern at Work) has:
 - [Further guidance](#) on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure
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- A free and confidential [advice line](#)
 - Consider whether the incident(s) was illegal, breached statutory or trust procedures, put people in danger or was an attempt to cover any such activity up.

What stops people from whistle blowing

- Starting a chain of events which spirals
- Disrupting the work or project
- Fear of getting it wrong
- Fear of repercussions or damaging careers
- Fear of not being believed

What action should the whistleblower take?

St Dunstan's 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 the wrong and give an explanation for the behaviour or activity.

St Dunstan's has designated 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:

Headteacher:	Ms Julia Corby St Dunstan's, Cheam, CofE Primary School Anne Boleyn's Walk Cheam Sutton SM3 8DF 020 8642 5463
Chair of Governors:	Mr Martin Swain c/o St Dunstan's, Cheam, C of E Primary School Anne Boleyn's Walk Cheam Sutton SM3 8DF

	020 8642 5463
Head of	Margaret Culleton
Internal Audit:	margaret.culleton@sutton.gov.uk
	020 8770 4956
NSPCC Advice Helpline	0800 028 0285 / e-mail help@nspcc.org.uk

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.

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 Margaret Culleton, the Head of Internal Audit on 020 8770 4956 or the NSPCC Advice Helpline on 0800 800 5000.

How to raise a concern

- You should voice your concerns, suspicions or uneasiness as soon as you feel you can. The earlier a concern is expressed the easier and sooner action can be taken.
- Try to pinpoint exactly what practice is concerning you and why.
- Ideally, you should put your concerns in writing, outlining the background and history, giving names, dates and places where you can.

A member of staff is not expected to prove the truth of an allegation but will need to demonstrate sufficient grounds for the concern.

The LA has its own procedures for dealing with such matters and will ensure every effort to respect the confidentiality of the whistleblower. The LA will ensure relevant officers of the DFE are informed as appropriate.

In addition, information and advice can be obtained from the charity Protect. 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:

Protect

The Green House
244-254 Cambridge Heath Road
London E2 9DA Tel No: 0203 117 2520 / E-mail
Protect Advice line: whistle@protect-advice.org.uk

How will the matter be progressed?

When a concern is received by the Headteacher / Deputy Headteacher referred to from here as the 'recipient' - they will:

- meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative
- get as much detail as possible about the concern at this meeting, and record the information. If it becomes apparent the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure
- reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken (see section 6 of this policy)
- establish whether there is sufficient cause for concern to warrant further investigation. If there is:
 - the recipient should then arrange a further investigation into the matter, involving the Headteacher / Deputy Headteacher if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In others cases, they may need to report the matter to the police
 - the person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps

Outcome of the investigation

Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether or not a referral is required to an external organisation, such as the local authority or police.

They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.

Beyond the immediate actions, the headteacher, trustees and other staff if necessary will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

Respecting Confidentiality

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

Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern.

If, however, an allegation is shown to be deliberately invented or malicious, the trust will consider whether any disciplinary action is appropriate against the person making the allegation.

Self-reporting

There may be occasions where a member of staff has a personal difficulty, perhaps a physical or mental health problem, which they know to be impinging on their professional competence. Staff have a responsibility to discuss such a situation with their line manager so professional and personal support can be offered to the member of staff concerned. Whilst such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of children.

Further advice and support

It is recognised that whistle blowing can be difficult and stressful. Advice and support is available from your line manager, HR department and/or your professional or trade union.

The Protect advice line can also help staff when deciding whether to raise the concern to an external party.

Conclusion

Existing good practice within *St Dunstan's Cheam C of E Primary 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, impropriety or safeguarding issues rarely occur. 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.

This policy links with our policies on

[Complaints](#)

[Child Protection](#)

Safeguarding
Managing Allegations Against Staff