



Moordown St John's CE Primary School

Policy for Whistle Blowing and Anti-Fraud

**"A Christian community where commitment to
educational excellence changes lives"**

Date Approved and Signed by Headteacher: 21 September 2016

A handwritten signature in black ink, appearing to read 'Peter Herbert', is written over the date.

Review Date: June 2021

**A copy of this policy in large print is available on request
from the school office.**

Moordown St John's CE Primary School

Whistle Blowing and Anti-Fraud Policy

RATIONALE

As a Church of England Primary School, we seek to further the work of Christ by expecting, nurturing and demonstrating the Fruits of the Spirit (Galatians 5) in our day to day lives. The Fruits of the Spirit include Love, Joy, Peace, Goodness, Kindness, Patience, Gentleness, Faithfulness and Self-control.

At Moordown St. John's we also aim to honour and fulfil the United Nations Convention on the Rights of the Child.

'Rights' are things every child should have or be able to do. All children have the same rights. These rights are listed in the UN Convention on the Rights of the Child. Almost every country has agreed to these rights. All the rights are connected to each other, and all are equally important. Sometimes, we have to think about rights in terms of what is best for children in a situation, and what is critical to life and protection from harm. As children grow, they have more responsibility to make choices and exercise their rights.

This policy refers directly to the following articles:

Article 3 – The best interests of the child must be a top priority in all actions concerning children.

Article 4 – Governments must do all they can to fulfil the rights of every child

Article 19 – Governments must do all they can to ensure that children are protected from all forms of violence, abuse, neglect and mistreatment by their parents or anyone else who looks after them

S U C C E S S

SUCCESS (Skills, Understanding, Creativity, Curiosity, Enjoyment, Spirituality, Security) is at the centre of our school's ethos and identity.

S – **Skills** that embed knowledge for a life full of learning and healthy relationships

U – **Understanding** how knowledge and concepts can be applied and built upon to achieve deep learning

C – **Creativity** to use skills and knowledge imaginatively to express oneself and solve problems

C – **Curiosity** to explore, investigate and understand the world

E – **Enjoyment** of life and of learning

S – **Spirituality** where faith is nourished, respected, challenged and lived

S – **Security** in themselves and who they are to reach their full potential

1. POLICY STATEMENT

Moordown St John's Primary School is committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

The aims of this policy are:

- To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide staff with guidance as to how to raise those concerns.
- To reassure staff that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

2. WHO IS COVERED BY THIS POLICY?

This policy applies to all individuals working at all levels of the school, including senior leaders, teachers, teaching assistants, office/IT staff, lunchtime supervisors, cleaners, other employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff and volunteers (collectively referred to as **staff** in this policy).

3. WHAT IS WHISTLEBLOWING?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- failure to comply with any legal or professional obligation or regulatory requirements;
- bribery;
- financial fraud or mismanagement;
- negligence;
- breach of our internal policies and;
- conduct likely to damage our reputation;
- unauthorised disclosure of confidential information;

- misuse of the IT system (e.g social media, internet etc)
- the deliberate concealment of any of the above matters.

A **whistleblower** is a person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure.

If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Officer, whose contact details are at the end of this policy.

4. RAISING A WHISTLEBLOWING CONCERN

We hope that in many cases you will be able to raise any concerns with the Whistleblowing Officer who may then involve HR as required. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.

However, where the matter is more serious, or you feel that your concerns have not been addressed, or you prefer not to raise it with them for any reason, you should contact the Chair of the Board of Directors. Contact details are set out at the end of this policy.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative for support to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

4 CONFIDENTIALITY

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible and have been made in good faith. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Public Concern at

Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

5 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 you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will never be appropriate to alert the media. Should the media need to be involved it will be the decision of the Whistleblowing Officer. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a parent, supplier, contractor or service provider. The law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact the Whistleblowing Officer for guidance.

6 INVESTIGATION AND OUTCOME

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.

7 IF YOU ARE NOT SATISFIED

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with the Chair of the Board of Directors. Contact details are set out at the end of this policy.

8 PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

9 RESPONSIBILITY FOR THE SUCCESS OF THIS POLICY

The Board of Directors, along with Human Resources, has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The Whistleblowing Officer has day-to-day operational responsibility for this policy, and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.

All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Whistleblowing Officer.

10. ANTI-FRAUD POLICY STATEMENT

For the purpose of this policy statement, fraud includes all irregularities which could normally be described as theft, deception, fraud, corruption or impropriety. Fraud is always wrong. In any organisation, it countermands the management at every level and positive action is needed to prevent and discourage it. The prevention of fraud and the protection of the Academy is the responsibility of every member of staff. In every case reported suspicions will be passed to an audit committee who will decide on a subsequent course of action.

When fraud is identified, action will be taken to:

- Limit the damage
- Seek reparation for losses incurred
- Punish the perpetrators
- Revise procedures to prevent any recurrence

Response to suspected fraud

The Academy has rules which attempt to allocate resources on a fair and even-handed basis. Fraudulent activity circumvents these rules and gives an unfairly generous allocation to one or more individuals to the detriment of all others.

Reporting suspected fraud

Any suspicion of fraud should be reported to a member of the Senior Leadership Team. If it is considered more appropriate (for example if a member of the Senior Leadership Team is involved) the suspicions may be reported directly to the Headteacher or to the Effective Resourcing Working Group.

After a suspicion is reported

The Senior Leadership Team member or Headteacher will make any initial enquiries considered necessary to validate the allegations; he or she will pass the matter to the Chair of the Effective Resourcing Working Group. Even if there is no evidence to support the allegation, the matter must be reported.

The Audit Sub-committee

The management of any investigation will be undertaken by an Audit Sub-committee set up and controlled by the Effective Resourcing Working Group. They will:

1. Determine whether further investigation is warranted
2. Determine whether the matter should be reported to the Chair of the Board of Directors, or special meeting of the Board of Directors.
3. Determine whom should carry out the investigation
4. Determine which outside agencies (police, auditors) should be involved
5. Assess the risk to the school
6. Determine to whom day-to-day management of the response should be given
7. Allocate responsibility for damage limitation action
8. Determine the course of action to recover losses
9. Determine the course of action to be taken against wrong-doers
10. Evaluate the events which enabled the fraud to occur
11. Ensure preventative action is taken.

11. CONTACTS

Whistleblowing Officer	Headteacher 01202 527383
Chair of the Board of Directors	C/O Clerk to the Board 01202 527683
Public Concern at Work (Independent whistleblowing charity)	Helpline: (020) 7404 6609 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk

12. POLICY REVIEW

This policy, which has been carefully considered and approved by the Headteacher in June 2016, will be due for review after a period of 5 years, ie during June 2021. However this will be brought forward should changes in protocol be recommended by the Government, the Department for Education, the Local Authority or the Diocese.

Signed:



Headteacher

Date: 21 September 2016