

**Christ Church NW1**

**Whistleblowing Policy**



**Autumn 2023**

Christ Church  
CE Primary School  
Regents Park  
NW1 4BD

## Vision and Values



**The Christian faith is at the heart of our school community.  
At Christ Church we all care, learn and work together for God and others.**

**'For we are all God's handiwork, created in Christ Jesus to do good works, which God prepared in advance for us to do'. Ephesians 2:10**

**Our Christian Values are  
Creation, Community, Endurance, Thankfulness, Reconciliation, Wisdom**

The distinctive nature of our approach to education can be found in our explicit Christian values, our collective worship, our grounded Christian ethos, our carefully crafted curriculum and in our Religious Education.

We aim to provide ambitious learning opportunities, promoting achievement in every area and nurturing social, emotional and spiritual well-being.

We actively promote the children's cultural capital (defined as the acquisition of skills and knowledge, which an individual can draw on to give them an advantage in life). We will introduce them to strong role models who will impart their knowledge and wisdom to help the children engender an appreciation of human creativity and achievement and to become responsible local and global citizens.

Character and resilience are the qualities we promote within our children, developing the inner resources that we call on to help us in life. We instil these qualities in our children to make sure that they are ready to make their way in the world as robust, confident and inquisitive individuals.

We know that confidence, knowledge and skills will help them to become compassionate and well balanced young people. We want them to take their place in society as active citizens, economically independent, exemplifying the British values of equality, mutual respect, democracy, individual liberty and rule of law.

We use our six Christian values, Creation, Wisdom, Thankfulness, Community Endurance and Reconciliation, to reinforce and enrich our teaching wherever applicable.

- **Creation**

For every house is built by someone, but God is the builder of everything. Hebrews 3:4

- **Wisdom**

For the LORD gives wisdom; from his mouth come knowledge and understanding. Proverbs 2:6

- **Thankfulness**

Give thanks to the LORD, for he is good; his love endures forever. 1 Chronicles 16:34

- **Community**

My command is this: Love each other as I have loved you. John 15:12

- **Endurance**

Let us not become weary in doing good, for at the proper time we will reap a harvest if we do not give up. Galatians 6:9

- **Reconciliation**

Bear with each other and forgive one another if any of you has a grievance against someone.

Forgive as the Lord forgave you.

Colossians 3:13

Our vision is inclusive and seeks to promote the whole child thrive within our Christ Church family.

Each member of our Christ church family; children, parents and staff are valued as God's creation.

We believe in full inclusion and acceptance of all and that this allows every individual to flourish.



**Date:** September 2023

**FGB approved:** 10/10/23

**Review date:** September 2025

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## Christ Church C of E Primary School

### Whistleblowing Policy

#### **Introduction**

The Governing Body of Christ Church School has approved this Policy as it continues to remain committed to the highest possible standards of conduct, as set out in the Schools Code of Conduct. Therefore employees who have concerns about suspected wrongdoing within the School are encouraged to come forward and report those concerns. This process is commonly referred to as “whistleblowing” and the aim of this Policy is to give detailed advice and reassurance to persons who wish to “blow the whistle” by reporting wrongdoing to those who can make a difference. By knowing about wrongdoing at an early stage, the School has the chance to take necessary steps to safeguard its interests. The message the School wishes to give its employees is that they must not hesitate to “blow the whistle” on wrongdoing and do so as early as possible.

Provided that employees are acting in the public interest when making a disclosure and they have a reasonable belief that the information disclosed tends to show that wrongdoing has occurred, is occurring or is likely to occur in the future, it does not matter if an employee subsequently realises that they are mistaken. Employees do not have to specifically prove anything in order to have their concerns about wrongdoing investigated. Through this Policy the School wishes to stress to employees that “if you are in doubt – raise it”.

The Governing Body and Headteacher (if appropriate) will consider the information received from a whistleblowing disclosure. However, the decision as to whether or not to investigate, and the extent of that investigation, will remain with the Governing Body. If any investigation does take place, employees will be expected to co-operate fully with that investigation.

The staff and governors of Christ Church 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, Christ Church has established the following whistleblowing policy, or 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.

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.

Christ Church 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.

Christ Church 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 and impropriety and not matters of more general grievance which would be dealt with under the school's grievance procedures.

### **When might the Whistle Blowing Policy apply?**

The type of activity or behaviour which Christ Church 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 (e.g. nepotism, employing a relation inappropriately)
- 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)

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

Christ Church 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 address the issue and give an explanation for the behaviour or activity.

Christ Church 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.

Name & Position

Contact Details

Headteacher  
Mrs Paula Walker

} C/O Christ Church School

Chair of Governors  
Ms Gill Green

} C/O The Clerk to the Governors (Christ  
Church School NW1)  
London Diocesan Board for Schools  
London Diocesan House, 36 Causton Street,  
London SW1P 4AU

Deputy Director & Head of Schools  
Support Services

} London Diocesan Board for Schools  
London Diocesan House, 36 Causton St.,  
London SW1P 4AU

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 [the LEA Chief Internal Auditor].

The LEA has its own procedures for dealing with such matters and will ensure every effort to respect the confidentiality of the '*whistleblower*'. The LEA will ensure relevant officers of the Department for Education and Employment 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:

Public Concern at Work  
Suite 306  
16 Baldwins Gardens  
London EC1N 7RJ Telephone number 020-7404 6609

### **How to Raise a Concern**

The School recognises that employees may wish to seek advice from their Trade Union representative, if applicable, or an advisory body such as Public Concern at Work, before raising a concern about suspected wrongdoing. Public Concern at Work is a charity which provides free support to both organisations and individuals with regard to whistleblowing issues. It also provides a safe haven where employees can confidentially discuss whether and how best to raise a whistleblowing concern. Although concerns about wrongdoing can be raised orally or in writing, the School would encourage employees to put them in writing, setting out the background and history of the concern and giving names, dates, places and amounts where possible, providing as much information as possible.

In all circumstances, employees should make it clear that they are raising their concerns about suspected wrongdoing under this Policy.

The School does not expect employees to prove that the suspected wrongdoing has

occurred, is occurring or is likely to occur in the future but they will need to show to the person they contact that they have sufficient grounds for their concern and that the information disclosed tends to show the suspected wrongdoing.

The School also encourages employees to put their names to any concerns they raise. If an employee expresses concerns about suspected wrongdoing anonymously, their disclosure is much less powerful.

Anonymous disclosures about suspected wrongdoing will still be considered by the School, although any action taken will be at the discretion of the person undertaking the initial investigation. In exercising this discretion, regard will be had to a number of factors, including:

- the seriousness of the concern raised;
- the credibility of the disclosure;
- the likelihood of confirming the concern from other sources.
- the ability to investigate if it is not possible to confirm facts or gather more information due to the anonymity of the whistleblower or other reasons.

The earlier an employee raises their concerns, the easier it may be for the School to take action.

Employees are encouraged to raise any concerns of suspected wrongdoing internally but it is recognised that in certain circumstances it may be appropriate to instead raise concerns externally, to the relevant external organisation or organisation for the relevant category of wrongdoing.

## **Responsibilities**

### **The Governing Body must:**

- treat all disclosures in confidence
- seek advice from their HR provider with regard to the application of this policy
- provide support to employees making whistleblowing disclosures where they consider the employee has a reasonable belief that the information disclosed is both accurate and in the public interest.
- consider fully whether to investigate any whistleblowing disclosures made and
- if it is decided that an investigation is required ensure that it is undertaken properly and objectively.
- inform the employee making the whistleblowing disclosures of the progress being made with any subsequent investigation (or provide a full explanation as to why an investigation will not be taking place). It is not necessary to provide detailed information which may breach the confidentiality of the investigation but rather provide reassurance that the investigation will reach an appropriate outcome.
  - where a whistleblowing disclosure is a “qualifying disclosure”, protect the employee making the disclosure from suffering any detriment in their employment (including dismissal) such as harassment or victimisation from
  - any other manager or employee because the employee has made the disclosure.
  - where a whistleblowing disclosure is a “qualifying disclosure”, take all possible steps to protect the employee making the disclosure from suffering any detriment in their employment by other parties outside the School with an interest in the concerns being raised because the employee has made the disclosure.



**The Headteacher will:**

- maintain a secure and confidential record of all whistleblowing disclosures and the outcomes reached from the investigations carried out in accordance with the School's Retention of Records Policy.
- refer all whistleblowing disclosures received to the Chair of the Governing Body and support the Governing Body in meeting their responsibilities under this policy.
- make employees (and contractors/agency workers) aware of the existence of this policy.

**Employees should:**

- report all concerns about suspected wrongdoing within the School (excluding any related to their own contract of employment) which come to their attention during their employment, providing that they have a reasonable belief that their concerns are accurate and that it is in the public interest that those concerns should be subject to further scrutiny.
- put their name to any whistleblowing disclosures made.
- fully participate in any investigation following a whistleblowing disclosure made by them

**How will the matter progress?**

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 and Employment, the LEA.

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 include some form of disciplinary action or third party referral such as the police.

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 LEA.

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 LEA.

**Respecting Confidentiality**

Wherever possible Christ Church 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.

### **Dealing with Malicious Unfounded Concerns**

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.

### **Conclusion**

Existing good practice within Christ Church 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.

### **Monitoring and Review**

The Headteacher and Governing Body are responsible for monitoring the effectiveness of this policy. It will be reviewed at least every two years.