

Sacred Heart Catholic Primary School



SACRED HEART

Whistleblowing Policy

Approved by the Governing Body on Wednesday 5 December 2012

Approved by the Governing Body on Monday 7 April 2014

All school policies take account of the school's ethos, which is enshrined in our Mission Statement and school community Code of Conduct.

MISSION STATEMENT

This is our school

Together we worship

Together we learn

Together we belong

With the love of God,
our dreams and ambitions come true.

CODE of CONDUCT

Whilst at Sacred Heart Catholic Primary School our dreams and ambitions will come true by...

- ✓ Following in Jesus' footsteps
- ✓ Protecting each other and the environment in which we work and play
- ✓ Listening to each other and talking through our problems
- ✓ Trying to take responsibility for our own actions
- ✓ Treating each other how we would like to be treated
- ✓ Understanding that it takes a full team to score many goals

The Governors of Sacred Heart Catholic Primary School have agreed the following guidelines in accordance with Liverpool City Council's 'Whistleblowing Statement and Procedures'.

Liverpool City Council has approved a 'Whistleblowing' Statement and procedures. This is in accordance with the Nolan Committee and the Public Interest Disclosure Act. This policy outlines the procedure in brief.

Employees are often the first to realise that there may be something wrong within the School and the procedure aims to encourage individuals to raise such concerns.

Provided the concerns are genuine, they may be reported without fear of victimisation, subsequent discrimination or disadvantage. If preferred, concerns can also be raised anonymously.

This procedure not only covers fraud, corruption and other financial irregularities, but also includes issues such as dangers to health and safety, damage to the environment and abuse.

Concerns you may have

The Whistleblowing procedure covers all concerns that individuals might have that are not covered by other School or Council Policies. These include:

- sexual, racial or physical abuse of pupils or staff, or other unethical conduct
- bullying, intimidation or harassment
- fraud
- the unauthorised use of public funds
- failure to comply with Standing Orders
- failure to comply with Codes of Practice
- conduct which is an offence or breach of law

- disclosure related to miscarriage of justice
- health and safety risks, including risks to the public as well as other employees
- damage to the environment

What to do if you have a concern

If you have any concerns whatsoever, including suspicion that any of the above is taking place or has taken place, then, depending on who is the alleged perpetrator, the following should be observed:

- You may wish to go directly to your Head teacher, Chair of Governors, Primary Senior Effectiveness Officer or Head of Audit, (who is the Council's Standards Officer responsible for channelling all concerns and monitoring investigations). Any of these alternatives is acceptable.
- Whichever path you choose, and this will depend on the scale of the problem and who you as an individual feel most comfortable talking to, do this immediately.
- Concerns may be raised verbally or in writing.
- You may wish to consider discussing your concerns with a colleague first and you may find it easier to raise the matter if there are two or more of you who share the concerns.
- Do not try to solve the problem yourself.
- Retain any evidence you may have and/or make an immediate note of the issues and your concerns.
- Do not investigate or interview staff (or contractors etc), this will be done by an appropriate officer, e.g. Personnel or Audit staff. A badly managed investigation may do more harm than good and there are a number of internal and external processes which have to be followed to yield a satisfactory conclusion.

HEADTEACHER Charles Daniels sacred-ht@sacredheart.liverpool.sch.uk

SIP Mr Ken Heaton 233 3901 ken.heaton@liverpool.gov.uk

HEAD of AUDIT Katherine Johnson 225 2651

katherine.johnson@liverpool.gov.uk

How the Council will respond

- Any initial concerns and discussions you may have will be treated sensitively and confidentially, and you must not be afraid to raise them. There may be perfectly good explanations for your concerns. If this proves to be the case then no further action will be needed and at least your concerns will have been aired.
- The conduct will be channelled to the most appropriate officer or service to deal with the matter.
- All matters relating to financial irregularity are investigated by Internal Audit.
- Within ten working days of a concern being raised you will receive written acknowledgement and be informed on staff mechanisms, e.g. Welfare officer.
- Where it is necessary for an officer to contact you a meeting will be arranged, off site if you wish, and a trade union or professional association representative or a colleague can accompany you.
- The Council will take steps to minimise any difficulties, which you may experience as a result of raising a concern.
- Subject to legal constraints, the Council will inform you of the outcome of any investigation.

The Council's Anti-fraud & Corruption Strategy

The Council now has a clear strategy that extends beyond the strict definitions of fraud and corruption; it embraces financial irregularities in general. Examples include:

- theft and misappropriation of assets;
- non-compliance with standing orders and Financial regulations, or other approved financial procedures;
- timekeeping or flexible working hours irregularities;
- breaches of the Code of Conduct.

FRAUD is defined by the Audit Commission as

‘the intentional distortion of financial statements or other records by persons, internal or external to the authority, which is carried out to conceal the misappropriation of assets or otherwise for gain’.

CORRUPTION is defined as

‘the offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person’.

Where might fraud or corruption happen?

- fraud can occur wherever staff or Governors who deal with the Authority can take financial advantage of the school. Corruption can happen when employees are influenced by personal motives or the motives of others into making decisions that are not in the best interests of the School, but rather to benefit themselves and others. The risk of fraud or corruption is enhanced where individuals are in positions of trust or responsibility and are not checked or subjected to effective monitoring or validation.

The following areas are particularly susceptible to fraud and corruption:

- claiming for services not performed e.g. overtime payments
- travel claims e.g. false journeys claimed, expenditure inflated

- expense claims e.g. excessive/inappropriate expenses claimed
- ordering e.g. goods ordered from a friend's business, goods ordered for personal use, accepting a lower number of items than ordered
- stocks and assets e.g. theft of materials
- failing to account for all income received
- deciding upon the award of contracts and the placing of purchase orders

N.B. These examples do not represent a comprehensive list of potential areas.

Declaration of Interest

All staff and Governors complete and sign a 'Declaration of Interest' form. This is updated annually or when changes occur. This form details any business or other interests that might cause a conflict of interest with their duties as an employee/Governor of the school.

How to prevent fraud or corruption

Whilst it may be difficult to create a 100% fraud proof system in every area, staff (and particularly managers) must ensure that the systems they operate include a reasonable number of effective controls. The controls should include the following:

- all staff should be trained in document procedures and controls
- separate duties between staff and consider staff rotation
- ensure adequate internal checks on initiating officers calculations/documentation
- all expenditure be supported by receipts/invoices
- a requirement to have more than one member of staff involved in negotiations with firms seeking to do business with school
- maintain official records that enable officers to show propriety in all matters, for example, gifts and hospitality records.

How your concerns can be taken further

The Governing Body hopes you will be satisfied with any action taken. If you are not, and if you feel it is right to take the matter outside the Governing Body, the following are possible contact points:

- District Audit
- Your Trade Union
- Your local Citizens Advice Bureau
- Relevant professional bodies or regulatory organisations
- The Police.

If you do take the matter outside the Council you should not disclose confidential information. Employees are also reminded that in accordance with the Code of Conduct, contact with the Press should only be made via the Press Office.

Safeguarding children: Ofsted's whistleblower hotline

What is whistleblowing?

Whistleblowing is the term used for an employee raising concerns about practices and procedures in their workplace.

Every organisation – be it a business or public body – may face the risk of misconduct in their workplace. When this happens, usually the first people to realise or suspect will be those who work in or with the organisation.

We want you to be able to contact us easily, so that we know about your concerns as soon as possible. To do this we have set up a pilot whistleblower hotline for circumstances where children and young people are affected or at risk.

When to contact our whistleblower hotline

There may be times when council employees and those working with young children will want to report to us concerns about practices and procedures for the safeguarding of children and young people.

You can contact our hotline in three ways:

- Call us on 08456 404046 (Monday to Friday from 8am to 6pm).
- Email us at whistleblowing@ofsted.gov.uk.
- Write to us at:

WBHL

Ofsted

Royal Exchange Buildings

St Ann's Square

Manchester

M2 7LA.

How is whistleblowing different to complaining?

Whistleblowing is very different from making a complaint.

If you are someone who wishes to complain about a service you use that we inspect or regulate, we will deal with your concerns through our normal complaints procedure. For further information please go to the how to complain section available via the navigation on the left.

Before you contact our hotline

If you have a concern you may wish to contact us. However, we suggest that you first read your employer's whistleblowing policy and then raise your concerns with your employer.

If your employer does not have a whistleblowing policy or if you are still not sure how to raise your concerns with your employer or someone else, we suggest you first get advice from the independent whistleblowing charity Public Concern at Work.

You can get free, confidential advice from Public Concern at Work. If you have witnessed wrongdoing at work and are unsure about what to do, a Public Concern at Work adviser can help you to decide whether and/or how to raise your concern. You can call on 020 7404 6609 or email helpline@pcaw.co.uk.

You can visit their website for further information: www.pcaw.co.uk. The website has guidance on whistleblowing legislation:

www.pcaw.co.uk/law/uklegislation.htm.