



St John of Jerusalem
Church of England Primary School

Whistleblowing Policy

April 2022 - April 2025

WHISTLEBLOWING POLICY

Introduction

The staff and governors of the St John of Jerusalem CoE Primary School seek to run all aspects of school business and activity with full regard for high standards of conduct and integrity. However, 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 John of Jerusalem CoE Primary School 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. This policy does not form part of any employee's contract of employment, and it may be amended at any time. This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work.

Throughout this policy, the term whistleblower denotes the person raising the concern or making the complaint. It is not meant in a pejorative sense. On the contrary, it 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.

St John of Jerusalem CoE Primary School is committed to tackling fraud and other forms of malpractice and treats these issues seriously. However, St John of Jerusalem CoE Primary School recognises that some concerns may be extremely sensitive and has therefore developed a system that allows for the confidential raising of concerns within the school environment and has recourse to an external party outside the management structure of the school.

St John of Jerusalem CoE Primary School is committed to creating a climate of trust and openness. Therefore, 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 to matters of more general grievance, which would be dealt with under the St John of Jerusalem CoE Primary School grievance procedures.

When might the whistleblowing policy apply?

Whistleblowing is the disclosure of information which relates to suspected Wrongdoing or dangers at work. The type of activity or behaviour which St John of Jerusalem CoE Primary 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
- Miscarriages of justice
- Negligence
- Financial fraud, deceit and bribery or mismanagement
- Danger to health and safety
- Serious breaches of school internal policies procedures which may advantage a particular party (for example,
 - Tampering with tender documentation, failure to register a personal interest)
- Damage to the environment
- The deliberate concealment of any of the above matters
- Unauthorised disclosure of confidential information;
- The deliberate concealment of any of the above matters; or

- The systematic failure to prioritise safeguarding where the appropriate procedures have not been followed

What action should the whistleblower take?

A whistleblower is a person who raises a genuine concern 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 them under this policy.

St John of Jerusalem CoE Primary 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 the wrong and give an explanation for the behaviour or activity.

St John of Jerusalem CoE Primary School has designated a number of individuals to deal with such matters specifically. 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;

Asarena Simon	Headteacher	asimon@st-johnjerusalem.hackney.sch.uk
Alister Bould	Chair of Governors	alister.bould@gmail.com

The whistleblower may prefer to raise the matter in person, by telephone or in the written form marked 'private and confidential and addressed to one of the individuals named above. All matters will be treated in strict confidence, and anonymity will be respected wherever possible.

Where St John of Jerusalem School receives a direct whistleblowing referral (e.g., via the Headteacher or Chair of Governors), the school must inform Hackney Education's "Responsible Officer for Schools" (contact details below). This allows LBH to provide the school with any support as required and maintain corporate oversight of the concern raised.

Alternatively, if the whistleblower considers the matter too serious or sensitive to raise within the school's internal environment or feels that the school has not addressed their concern, in that case, the matter should be directed to the following members at Hackney Council in the first instance.

- The Audit investigating Team, Hackney Council, 1 Reading Lane, Hackney, London
- Expolink (our confidential external telephone hotline)

London Borough of Hackney Contacts:

Organisation officer and delegation	Contacts
Whistleblowing Officer (Head of Investigations)	Vinny Walsh Tel. 0208 356 2536 Email Vinny.walsh@hackney.gov.uk
Corporate Head of Audit, Anti-Fraud & Risk Management	Michael Sheffield Tel. 020 8356 2505 Email Michael.sheffield@hackney.gov.uk
Hackney Learning Trust – Responsible Officer for Schools	Monica Imbert Tel: 020 8820 7076 Email Monica.imbert@hackney.gov.uk
Whistleblowing Hotline	Navex Global

(24-hour hotline)	Step 1: Call 0800 890 011 Step 2: When prompted, dial 833 558 1923
Public Concern at Work (Independent whistleblowing charity)	Helpline: (020) 7404 6609 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk

St John of Jerusalem CoE Primary School would prefer that a serious concern is raised responsibly rather than not at all. However, despite the assurances, the whistleblower may feel that it is more appropriate to raise the concern with an external organisation, such as a regulator. It is, of course, open for them to do so, provided they have sufficient evidence to support the concern. St John of Jerusalem CoE Primary School strongly advises that before reporting the concern externally, the whistleblower seeks advice from one of the following:

- Public Concern at Work, a registered charity which advises on serious malpractice within the workplace, can be contacted on 020 7404 6609.
- The Audit Commission, "prescribed persons" under the Public Interest Disclosure Act, have set up an Anti-fraud and Corruption Unit which can be contacted on: 020 7630 1019.
- London Borough of Hackney maintains a 'Whistleblowers' Hotline for staff provided by Expolink. To report a concern via the Whistleblowing Hotline, please call 0800 890 011. This number is also available from the Whistleblowing page on the Council's Intranet.

External disclosures

This policy aims 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 before first exhausting this internal procedure.

The law recognises that in some circumstances, it may be appropriate for you to report your concerns to a designated external body, depending on the area that your concern relates to, such as the Council's External Auditor, the Care Quality Commission or Ofsted. A full list can be found at <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>. It will never be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external, and if you do so, you must be careful not to reveal any confidential information unlawfully.

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 supplier or service provider. The law will protect you if you directly raise the matter with a third party in some circumstances. However, we encourage you to report such concerns internally first.

How will the matter be progressed?

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 a foundation and can be resolved internally. You may be required to provide further information as part of this process. The initial assessment may identify the need to involve third parties to provide further information, advice or assistance: for example, the involvement of other members of school staff, legal or personnel advisors, the police and Hackney Council.

Records will be kept of work undertaken, and actions will be 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 actions to take. This may include some form of disciplinary action or third party referral, such as the police. The investigation may make recommendations for change to enable us to minimise the risk of future wrongdoing

We will aim to keep the whistleblower informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us from giving out specific details of the investigation or any disciplinary action taken. Therefore, any information about the investigation should be treated as confidential.

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, whether or not it has been substantiated, the matter will be reported to the Governing Body and the London Borough of Hackney

Hackney Council has their own procedures for dealing with such matters and will ensure every effort to respect the whistleblower's confidentiality. However, if the whistleblower is not satisfied with the outcome of an investigation, St John of Jerusalem CoE Primary School would prefer that the whistleblower raise this with them or Hackney Council, explaining why this is the case. The concern will be looked at again if there is a good reason to do so.

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 Hackney Council Corporate Head of Audit, Anti-Fraud & Risk Management.

Respecting confidentiality

Wherever possible, St John of Jerusalem CoE Primary School seeks to respect the confidentiality and anonymity of the whistleblower and will, as far as possible, protect them from reprisals. Accordingly, St John of Jerusalem CoE Primary School will not tolerate any attempt to victimise the whistleblower or attempts to prevent concerns from being raised. The school will consider any necessary disciplinary or corrective action appropriate to the circumstances. The Public Interest Disclosure Act became law in 1999 and gives a "worker" the right not to be victimised or dismissed because they have made a protected disclosure.

Raising unfounded, malicious concerns

Individuals are encouraged to come forward in good faith with genuine concerns, with the knowledge they will be taken seriously. However, if we conclude that a whistleblower has made false allegations and that these have been raised in bad faith (e.g. frivolously, maliciously, with a view to personal gain or for an ulterior motive), the whistleblower may be subject to disciplinary action. Furthermore, becoming a whistleblower does not guarantee immunity for any person who raises concerns about malpractice that they have been substantively involved in.

This policy should not be used for complaints relating to your own personal circumstances, such as how you have been treated at work. In these cases, you should use the appropriate HR policy, such as the Grievance Procedure or the Anti-Harassment and Bullying Policy of the school.

Protection and support for whistleblowers

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

Staff must not suffer any detrimental treatment as a result of raising a genuine concern. 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 immediately inform the whistleblowing officer. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

Conclusion

Existing good practices within the St John of Jerusalem CoE 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 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. If necessary, outside the school's management structure. This document is a public commitment to take concerns seriously and will be actioned.

Additional Sources of Advice and Information

Schools may wish to contact the charity Public Concern at Work for additional information and advice on developing a whistleblowing policy. 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

<http://www.pcaw.org.uk>

Tel: Whistleblowing Advice Line: 020 7404 6609

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To be reviewed: April 2025