

Policy on Whistleblowing

Mission Statement

We are a Catholic Sixth Form dedicated to the education and development of the whole person, so that all students can realise their full potential.

To achieve this as a community we will:

- Provide the highest standards of teaching and learning.
- Expect students to show commitment to their studies and the Christian values of the Sixth Forms.
- Provide equality of opportunity, with mutual respect and positive encouragement.
- Build and further develop a partnership with parents, schools, parishes, higher education, employers and the local community.
- Value staff and support their professional development.

In doing this we will reflect Christ's teaching in the life and work of the whole Sixth Form.

Introduction

Christ the King Sixth Forms is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees, sub-contractors and others that we deal with to inform senior managers if they are concerned about serious malpractice, fraud or corruption in the Sixth Forms.

This policy document makes it clear that you can do so without fear of victimisation, subsequent discrimination or disadvantage. It is intended to encourage and enable employees and others to raise issues of serious concern within the Sixth Forms.

The policy applies to all employees and those contractors working for the Sixth Forms on CTK premises, for example, agency staff and builders. It also covers suppliers and those providing services under a contract with the Sixth Forms in their own premises.

1. Aims and Scope of this Policy

There are existing procedures in place to enable employees to lodge a grievance relating to their employment or users of the Sixth Forms to complain about the quality of service provided. This policy on whistle blowing is intended to cover major concerns that fall outside the scope of other procedures. These include:

- Conduct, which is an offence or a breach of law
- Disclosures related to miscarriages of justice
- Serious health and safety risks, including risks to the public as well as other employees
- Damage to the environment
- The unauthorised use of public funds
- Abuse of students
- Other unethical conduct

Therefore, any serious concerns about any aspect of service provision; or the conduct of employees of the Sixth Forms; or members/others acting on behalf of the Sixth Forms can be reported under the Policy on Whistle Blowing.

2. Safeguards

Christ the King Sixth Forms is committed to good practice and high standards and wants to be supportive of employees. Any employee who raises a concern with senior CTK managers will have the right to have the matter treated confidentially.

The Sixth Forms does not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect individuals who raise a concern in good faith.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that might already affect individuals who raise a concern.

3. Anonymous Allegations

This policy encourages individuals to put their name to an allegation whenever possible. Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Sixth Forms.

In exercising this discretion the factors to be taken into account will include:

- The seriousness of the issues raised.
- The credibility of the concern; **and**
- The likelihood of confirming the allegation from attributable sources.

4. Untrue Allegations

If an allegation is made in good faith, but is not confirmed by the investigation, no action will be taken against individuals. If, however, an allegation is proved to have been made frivolously, maliciously or for personal gain, disciplinary action will be taken against the individual raising the concern.

5. How to Raise a Concern

As a first step, concerns will normally be raised with the immediate line manager. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. If the line manager is not the appropriate person for any reason, concerns should be raised with the Executive Principal who will be the designated officer. If an individual has a concern about malpractice within the senior management team as a whole they may speak directly to the Chair of Governors, Chair of the Audit & Risk Committee or another member of the Governing Body via the Clerk to Governors.

Initial concerns may be raised verbally but this will need to be supported by written documentation. This will normally have the following format:

- The background and history of the concern (giving relevant dates).
- The reason why individuals are particularly concerned about the situation.
- Where the concern of malpractice is related to Safeguarding, this must be raised and dealt with under the Safeguarding Policy.

The sooner concerns are expressed, the easier it is to take action.

Although individuals are not expected to prove beyond doubt the truth of an allegation, they will need to demonstrate to the person contacted that there are reasonable grounds for concern.

A trade union representative or a friend may be invited to be present during any meetings or interviews, off site if so desired, in connection with the concerns that have been raised.

On receiving an allegation of serious malpractice from an employee, the designated officer will send a written acknowledgement of the concern to the individual at their home address within 24 hours.

The designated officer will inform the Executive Principal and/or Chair of the Audit & Risk Committee if appropriate, that an allegation has been received.

Having made initial enquiries, the designated officer will decide whether an investigation is appropriate and what form it should take. The overriding principle that the Sixth Forms will have in mind is the public interest. Investigations may be:

- Conducted by senior management through the disciplinary process.
- Referred to the Audit & Risk Committee who will decide whether to commission Internal Audit Services or others to undertake a special investigation.
- Referred to the police.
- Referred to the DfE and/or ESFA or other relevant Government Body.
- Form the subject of an independent inquiry.

The designated officer will report back to the concerned individual in writing as to whether an investigation is appropriate, the progress of any investigation and when it is likely to be concluded. The Head of the Internal Audit Services will be informed so that they can consider the adequacy of the relevant controls, evaluate the implication of the fraud on risk management, control and governance processes and consider making recommendations as appropriate.

Christ the King will take steps to minimise any difficulties to an individual raising a concern. The anonymity of the complainant may not always be preserved particularly where the disclosure might lead to disciplinary action. If the complainant is required to give evidence in criminal or disciplinary proceedings, the Sixth Forms will arrange for advice to be provided on the procedures involved.

6. How the matter can be taken further

- If the concerned individual is not satisfied that the designated officer is properly dealing with the concern, they may raise their concern in confidence with the Chair of Governors, Chair of the Audit & Risk Committee or another member of the Governing Body, via the Clerk to Governors.
- If the Governing Body finds the allegation unsubstantiated the concerned individual may have right of access to an appropriate external body. This recourse should only be used when internal procedures have been exhausted. An appropriate outside body might be internal or external auditors, the ESFA, a trade union or a relevant professional body.

7. Data Protection

When an individual makes a disclosure, the Sixth Form will process any personal data collected in accordance with its data protection policy. Data collected from the point at which the individual makes the disclosure is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

8. Accountability

The Sixth Form will keep clear and comprehensive records of all concerns raised under this policy and procedure (including cases where the Sixth Form deems that there is no case to answer and therefore that no action should be taken) and will report to the Audit & Risk Committee of the Corporation on an annual basis as appropriate.

9. Review of Policy on Whistleblowing

This policy will be reviewed for fitness of purpose at least annually or after each use. Any need for change will be reported to the Audit & Risk and Finance, Resources & Business Committees for approval.

Date Approved: June 2024

Next Review Due: July 2028