

WHISTLEBLOWING POLICY

To realise – in mind, body and spirit – the full potential of every member of the St Edmund's Family, through Catholic values, learning, service and leadership.

Avita Pro Fide

St Edmund's is committed to ensuring the welfare and protection of children in its care and this commitment is a fundamental part of the role of every person employed by St Edmund's.

1. About this Policy

St Edmund's is committed to achieving the highest possible standards of honesty and integrity, and we expect all staff to maintain these high standards, in accordance with our Code of Conduct for Staff and Safeguarding and Child Protection Policy. However, as with all organisations, we 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 to prevent such situations occurring and to address them when they do occur.

This policy covers all employees, officers, consultants, contractors, volunteers, casual workers, those on work experience and agency workers.

The aims of this policy are:

- a) 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.
- b) To provide staff with guidance as to how to raise those concerns.
- c) To reassure staff that they should be able to raise genuine concerns 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, or other contract to provide services, and the College may amend it at any time.

2. Personnel Responsible for the Policy

The Board of Governors has overall responsibility for the effective operation of this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The HR Director has day-to-day operational responsibility for this policy, and you should refer any questions about this policy to them in the first instance. The HR Director must ensure that regular and appropriate training is provided to all managers and other staff who may deal with concerns or investigations under this policy.

The HR Director, in conjunction with the Board of Governors, should review this policy from a legal and operational perspective at least once a year.

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 HR Director.

3. What is Whistleblowing?

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

- a) criminal activity;
- b) behaviour which puts or could put children at risk;
- c) financial fraud or mismanagement;
- d) failure to comply with any legal or professional obligation or regulatory requirements;
- e) bribery;
- f) facilitating tax evasion;
- g) negligence;
- h) danger to health and safety;
- i) miscarriages of justice;
- j) damage to the environment;
- k) conduct likely to damage the College's reputation or financial wellbeing;
- l) unauthorised disclosure of confidential information;
- m) breach of the College's internal policies and procedures including our Staff Code of Conduct;
- n) inappropriate purchasing/sourcing/taking of equipment, property or money;
- o) potential failures in the College's safeguarding regime;
- p) Exams-related breaches including, but not limited to, the following:
 - Failure to comply with exam regulations as set out by the Joint Council for Qualifications (JCQ) and its awarding bodies
 - A security breach of the examination paper
 - Conduct of centre staff which undermines the integrity of the examination
 - Unfair treatment of candidates by either giving an advantage to a candidate/group of candidates (e.g. by permitting a candidate an access arrangement which is not supported by appropriate evidence), or disadvantaging candidates by not providing access to the appropriate conditions (providing a 'level playing field')
 - Possible fraud and corruption (e.g. accessing the exam paper prior to the exam to aid teaching and learning)
 - Abuse of authority (e.g. the head of centre/members of SLT overriding JCQ and awarding body regulations);
- q) Other conduct which may be interpreted as malpractice/maladministration, and
- r) the deliberate concealment of any of the above matters.

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 the College's 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, Prevention of Sexual Harassment or Dignity at Work Policy as appropriate.

If a complaint relates to your own personal circumstances but you also have wider concerns regarding one of the areas set out above (for example, a breach of our internal policies), you should discuss with the HR Director which route is the most appropriate.

If you are uncertain whether something is within the scope of this policy you should seek advice from the HR Director, 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 your line manager. 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. In some cases they may refer the matter to the HR Director.

However, where the matter is more serious, or you feel that your line manager or the HR Director have not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

- a. The Deputy Head
- b. The Headmaster
- c. The Chair of Governors

If your concern involves a suspicion of fraud, the matter must be reported to the Headmaster or Chair of Governors.

Where there are concerns about the Headmaster, this should be referred to the Chair of Governors. Where an allegation is against the Headmaster, the Headmaster must not be informed of the allegation prior to contact with the Chair. Where there are concerns about the Chair of Governors, this should be referred to the police if regarding illegal activity or the relevant authority.

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 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.

5. 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, although we will make every effort to investigate anonymous disclosures. You should be aware that 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. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the HR Director or one of the other contact points listed above under 'Raising a Whistleblowing Concern' and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from our Employee Assistance Programme, or 'Protect', the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

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 and outcome, 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, 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 one of the other key contacts set out in 'Raising a Whistleblowing Concern', above.

8. 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. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, 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 supplier, contractor, volunteer, parent, visitor or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However we encourage you to report such concerns internally first, in line with this Policy. You should contact your line manager, the HR Director or one of the other individuals listed within this Policy.

9. 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 under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a 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 inform the HR Director immediately. If the matter is not remedied, you should raise it formally using the College's Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to the College's disciplinary process. In some cases the Whistleblower could have a right to sue you personally for compensation in an employment tribunal.

Contacts

Protect (Independent whistleblowing charity)	Helpline: (020) 3117 2520 Email: use the contact form on their website www.pcaw.co.uk or email whistle@pcaw.co.uk
Headmaster Mr Matthew Mostyn	Email: mmostyn@stedmundscollege.org Phone: 01920 824204
Deputy Head Academic Mrs Sarah Sanders	Email: ssanders@stedmundscollege.org
Headmaster Prep School Mr Stephen Cartwright.	Email: scartwright@stedmundscollege.org
Chair of Governors Mr Paul Raynes	Email: chair@stedmundscollege.org
HR Director Mrs Helen Duffy	Email: hrdirector@stedmundscollege.org Phone: 01920 824361
Hertfordshire Local Authority Designated Officer (LADO)	LADO.Referral@hertfordshire.gov.uk Tony Purvis - 01992 555420 Tony.Purvis@hertfordshire.gov.uk Frazer Smith – 07920283106 or 01992 556935 Frazer.smith@hertfordshire.gov.uk Andrea Garcia- Sangil - 01992 556372 andrea.garcia-sangil@hertfordshire.gov.uk
Hertfordshire Senior Child Protection School (Generic & Non Urgent advice)	Kassiane Papageorgiou (Team Manager LADO & CPSLO) 01992 556979
Multi Agency Safeguarding Hub (M.A.S.H) (Specific Cases Advice)	0300 123 4043
Essex Children's Services	0345 6037627
Joint Child Protection Investigation Team - Hertfordshire	01707 354000
Non-emergency Police Number	101
Buntingford Police Station (Local Police)	01992 533 330
Childline	0800 1111
NSPCC Helpline	0808 8005000
Disclosure and Barring Service	03000 200 190
The Children's Commissioner for England	0207 783 8330 Visit www.childrenscomissioner.gov.uk and use the 'contact us' link.

Owner of policy:	HR Director		
Reviewed by:	HR Director	and SLT	
Frequency of review:	Annually		



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