# CARDINAL POLE CATHOLIC SCHOOL



# Whistle Blowing Policy

Approved by Governors	Signed:	Madubakeessa	Date:	30/11/22	
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#### I. Cardinal Pole School Vision

Cardinal Pole Catholic School is a learning community for all based upon partnership and respect. It is a strong and vibrant place which recognizes the importance and individual needs of every pupil and member of staff. Praise and encouragement is vital in creating a climate of learning and high expectations supported by teaching of the highest quality. The school is full of confident, creative and fulfilled young people and staff. They are celebrated as individuals – unique creations of God – who deserve our support, love and trust as they begin the great journey of life.

#### 2. Mission Statement

Cardinal Pole Catholic School is a community of service guiding young people on a path to opportunity, aspiration and reward, founded on Catholic values.

#### 3. Introduction

The staff and Governors of Cardinal Pole Catholic 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, Cardinal Pole Catholic School has established the following whistle blowing 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 whistle blower 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.

Cardinal Pole Catholic 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 that 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.

Cardinal Pole Catholic 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 to matters of more general grievance, which would be dealt with under the school grievance procedures.

#### 4. When might the whistle blowing policy apply?

The type of activity or behaviour which Cardinal Pole Catholic 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
- Fraud and deceit
- Serious breaches of school procedures which may advantage a particular party (for example, tampering with tender documentation or failure to register a personal interest).

#### 5. What action should the whistle blower take?

Cardinal Pole Catholic School encourages the whistle blower 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.

The school has designated a number of individuals to specifically deal with such matters and the whistle blower is invited to decide which of those individuals would be the most appropriate person to deal with the matter.

#### Contact details:

Position	Name	Contact details
Headteacher	Adam Hall	Cardinal Pole Catholic School
		Tel: 0208 8985 5150
Associate Deputy Headteacher	Alex O'Donoghue	Cardinal Pole Catholic School
		Tel: 020 8985 5150
Deputy Headteacher	Eleanor Connolly	Cardinal Pole Catholic School
		Tel: 020 8985 5150
Chair of Governors	Justin Madubuko	Care of :Cardinal Pole Catholic School
		Tel: 0208 8985 5150

The whistle blower 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 whistle blower 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 following members of Hackney Education or the Diocese of Westminster:

Hackney Education – Responsible Officer for Schools	Monica Imbert Tel. 020-8820-7076 Email Monica.imbert@hackney.gov.uk	
Whistleblowing Hotline (24 hour hotline)	Navex Global Tel. 0800 890011, then at the prompt, dial 833 558 1923	
Protect (Independent whistleblowing charity)	Helpline: 020 3117 2520 Website: https://protect-advice.org.uk/	

Whistleblowing Officer (Audit Investigation Team Manager)	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

Director of Schools, Archdiocese of Westminster, Vaughan House, 46 Francis Street, London. SWIP ION

Financial - Assistant Director of Finance, Hackney Education, I Reading Lane, Hackney, London. E8 IGO

Other - Head of Human Resources, Hackney Education, I Reading Lane, Hackney, London. E8 IGQ

The school would prefer that a serious concern is raised responsibly rather than not at all. Despite the assurances, the whistle blower 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. The school strongly advises that before reporting the concern externally, the whistle blower 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.

Email: whistle@pcaw.co.uk
Website: www.pcaw.co.uk

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.

#### 6. 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 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 and Hackney Education

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 whistle blower 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 Hackney Education.

#### 7. Respecting confidentiality

Wherever possible the confidentiality and anonymity of the whistle blower will be respected and as far as possible the school will protect him/her from reprisals. Cardinal Pole Catholic School will not tolerate any attempt to victimise the whistle blower or attempts to prevent concerns being raised, and 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 he or she has made a protected disclosure.

## 8. Raising unfounded malicious 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 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.

#### 9. Conclusion

Existing good practice within Cardinal Pole Catholic School in terms of it's 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 whistle blowing 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.