



Salvatorian  
College

# WHISTLEBLOWING POLICY

***“The way of the guilty is devious, but the conduct of the innocent is upright.”  
— Proverbs 21:8***

Updated	Reviewed by	Approved date	Next review due
November 2024	FPP Committee	November 2024	Jordan Term 2025
November 2025	FGB	January 2026	Spring 2027

## Rationale

The Staff and Governors of the Salvatorian College seek to run all aspects of school business and activity with full regard for high standards of conduct and integrity. They recognise their accountability for public funds and they are also cognisant that school and business affairs must be conducted with probity, acumen, and skill. Additionally, there is a wider responsibility, not only to the school community but also to the wider public. If members of school staff, parents, governors, or the school community at large become aware of any relevant activities which give cause for concern, the governors of the Salvatorian College have 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.

Throughout this policy, the term *whistleblower* 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.

The governors of Salvatorian College are committed to tackling fraud and other forms of malpractice and treat these issues seriously. They recognise that some concerns may be extremely sensitive and have therefore developed a system which 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.

The governors of Salvatorian College are committed to creating a climate of trust and openness so that a person (staff, including temporary staff, contractors, and volunteers who have knowledge of the setting – e.g. trustee in an academy trust) 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 matters of more general grievance, which would be dealt with under the school's grievance procedure.

### When might the whistleblowing policy apply?

The type of activity or behaviour, which Salvatorian College 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 e.g. bullying of staff or students
- fraud and deceit
- serious breaches of school procedures which may advantage a particular party (for example, tampering with tender documentation, failure to register a personal interest)
- concerns about poor or unsafe safeguarding practices.
- Conduct likely to damage the Trust's and/or Academy's reputation, including in relation

to its Catholic character, and/or conduct likely to bring the Catholic Church into disrepute.

This list is not intended to be exhaustive.

## What action should the whistleblower take?

The governors of Salvatorian College encourage 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.

The governors of Salvatorian College have designated a number of individuals to specifically deal with such matters and the whistleblower is invited to decide which of those individuals would be the most appropriate person to deal with the matter.

<b>Name &amp;/or Position</b>	<b>Contact Details</b>
<b>Mr J Martin, Acting CEO</b>	<b>c/o Salvatorian College</b>
<b>Mr A. Bryant, Head of School</b>	<b>c/o Salvatorian</b>
<b>College Mr P. O'Connell, Chair of Governors</b>	<b>c/o Salvatorian</b>
<b>College</b>	
<b>Fr R Mway Zeng, Chairman of Members</b>	<b>c/o The Society of the Divine Mercy,</b>
	<b>191 High Road, Harrow HA3 5EE</b>
<b>Director of Education</b>	<b>Westminster Diocese, 46 Francis Street,</b>
	<b>London SW1P 1QN</b>

The whistleblower 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. All those named have a responsibility to act on the concerns raised. Failure to do so in accordance with internal procedures may lead to disciplinary action.

Alternatively, if the whistleblower 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 Director of Education at the Diocese of Westminster.

Staff should first raise concerns internally through their school's procedure. If they don't want to report internally or the issue isn't resolved, they can make a disclosure to the Department for Education (DfE) using the Customer Help Portal providing full details of the school, including its name, address, and postcode. Whistleblowing policies are for concerns that are in the public interest, such as safeguarding failures, health and safety risks, or financial misconduct, not for general grievances or questioning business decisions.

## How will the matter be progressed?

The individual(s) in receipt of the information or allegation (the investigating officer(s) appointed by the Head of School or Chair of Governors) will carry out a preliminary investigation in a timely fashion. When a concern is raised, either verbally or in writing, the whistleblower will be sent an acknowledgment. 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, the school's external auditors, legal or personnel advisors, the police, the Department for Education, the London Borough of Harrow, and the LADO (Local Authority Designated Officer).

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 standard setting or disciplinary action, suspension from duties, or third-party referral such as to

the Police. These sanctions are not exhaustive.

The whistleblower will be informed of the results of the investigation promptly in a written form. This will be after investigations have concluded and action has been 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 the Westminster Diocese.

If the whistleblower is dissatisfied with the conduct of the investigation or resolution of the matter or has genuine concerns that have not been handled appropriately, the concerns should be raised with the investigating officer(s), the governing body and/or directed to the Diocese.

### **Respecting Confidentiality**

Wherever possible, the governors of Salvatorian College seek to respect the confidentiality and anonymity of the whistleblower and will, as far as possible, protect the person from reprisals. The governors of Salvatorian College will not tolerate any attempt to victimise the whistleblower or attempts to prevent concerns being raised and will consider any necessary disciplinary or corrective action appropriate to the circumstances.

### **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 unfounded concerns or attempts to make mischief (e.g., in a way that breaches the implied duty of trust and confidence between an employer and employee), this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances.

### **Conclusion**

Existing good practice within 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 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.

This policy will be reviewed on an annual basis.

**Signed:**

**A Bryant – Head of School**

A handwritten signature in black ink that reads "Alan Bryant". The signature is written in a cursive style with a large initial 'A'.

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