



**CtKCC**  
Christ the King  
Catholic Collegiate  
Together as one community  
with Christ at the centre



## WHISTLEBLOWING POLICY

Date: September 2024  
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Review: September 2026

This policy has been adopted by Christ the King Catholic Collegiate (CtKCC) Multi Academy Company for the purposes providing guidance to staff on how any concern they have can be raised, recorded and acted upon in a confidential manner.

### Definitions

In this Whistleblowing Policy, unless the context otherwise requires, the following expressions shall have the following meanings:

- i. 'Academy' means the academy named at the beginning of this Whistleblowing Policy and Procedure and includes all sites upon which the academy undertaking is, from time to time, being carried out.
- ii. 'Multi-Academy Company' means the company responsible for the management of the Academy and, for all purposes, means the employer of staff at the Academy.
- iii. 'Board' means the Board of Directors of the Multi-Academy Company.
- iv. 'Chair' means the Chair of the Board of Directors appointed from time to time.
- v. 'Clerk' means the Clerk to the Board of Directors appointed from time to time.
- vi. 'Companion' means a willing work colleague not involved in the substance of the issue under review by this Whistleblowing Policy, or an accredited trade union representative or an official employed by a trade union who will be expected to make themselves available for the periods of time necessary to meet the timescales under this Policy.
- vii. 'Diocesan Schools Commission' means the education service provided by the diocese which may also be known, or referred to, as the 'Diocesan Education Service'.

- viii. 'Directors' means the Directors appointed to the Board of Directors of CtKCC, from time to time.
- ix. 'Board of Directors' means the Directors of CtKCC and, in the case of an academy, means the Local Governing Body.
- x. 'Local Governing Body' means the group of governors appointed and elected to carry out specified functions in relation to the Academy as delegated by the Multi-Academy Company.
- xi. 'Vice-Chair' means the Vice-Chair of the Board or the Vice-Chair of the Local Governing Body' elected from time to time, as appropriate.
- xii. 'You', refers to all employees in or working with or assisting CtKCC. This includes permanent and temporary employees, and employees seconded to a third party.

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## **1. Introduction**

- 1.1. This policy applies to all employees of Christ the King Catholic Collegiate Multi-Academy Company who have major concerns over any wrongdoing within CtKCC relating to unlawful conduct, financial malpractice or dangers to the public or the environment.
- 1.2. The Board of Directors and all staff seek to run all aspects of CtKCC business and activity with full regard for high standards of conduct and integrity. In the event that members of academy staff, parents, Directors or the school community at large become aware of activities which give cause for concern, this confidential reporting code 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.
- 1.3. The Board of Directors are committed to tackling fraud and other forms of malpractice and treats these issues seriously. Some examples of malpractice are set out in paragraph 2.4. Academies 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 as set out in paragraph 8.7.
- 1.4. 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 CtKCC Grievance Policy.
- 1.5. The Board of Directors are 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.
- 1.6. This policy sets out a framework within which you can raise concerns without fear of victimisation, subsequent discrimination or disadvantage. The policy is intended to encourage and enable serious concerns to be raised rather than overlooking a problem. You may wish to seek support and advice from your trade union about this policy.
- 1.7. This policy has been adopted by the Board of Directors and has been the subject of consultation with Trade Unions.

## **2. Aims and Scope of this policy**

- 2.1 This policy aims to:
  - encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice;
  - provide avenues for you to raise those concerns and receive feedback on any action taken;
  - ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied;
  - reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made any disclosure in good faith.
- 2.2 This policy is not intended to be used where other, more appropriate, procedures are available, for example:
  - Grievances – (see Staff Grievance Policy);
  - Harassment – (see Anti-Harassment Policy and Procedure);
  - Complaints of misconduct against LGB members and Directors (for further information, please contact the Diocesan Education Service);

- Child protection (Safeguarding policy);
- Complaints (see Complaints Policy).

2.3 Whilst complaints of the nature described in 2.2 may be initially received under this policy, they may be progressed under other more suitable procedures as indicated above.

2.4. The Whistleblowing policy 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, *e.g. negligence in service delivery or breach of contractual requirements such as those in the employee code of conduct.*
- Disclosures related to miscarriages of justice, *e.g. false reporting or perjury.*
- Health and safety risks, including risks to the public as well as other employees, *e.g. failure to carry out risk assessments or mishandling of hazardous materials such as asbestos.*
- The unauthorised use of public funds, *e.g. serious breaches of CtkCC procedures which may advantage a particular party, tampering with tender documentation, manipulation of accounting records and finances, inappropriate use of CtkCC assets or funds.*
- Possible fraud and corruption, *e.g. false claims for overtime payments.*
- Sexual or physical abuse of any employee.
- Other unethical conduct, *e.g. inappropriate receipt of gifts and hospitalities, breach of CtkCC governance arrangement.*
- Conduct not compatible with the teachings of the Catholic Church as set out in CES contracts.

### **3. Who is covered by this Policy?**

3.1 All employees in or working with or assisting CtkCC may use this policy. This includes permanent and temporary employees, and employees seconded to a third party. It is also applicable to:-

- Contractors working for CtkCC on school premises, for example, agency staff, builders, drivers;
- Suppliers and those providing services under a contract with CtkCC in their own premises.

3.2 Any concerns relating to the third party, if relevant to the employee's secondment, can also be raised under this policy.

### **4. Safeguards**

4.1 The Board of Directors, CEO, Headteachers and the Local Governing Body (LGB) are committed to good practice and high standards and want to be supportive of all employees.

4.2 The Board of Directors, CEO, Headteachers and the LGB recognise that the decision to report a concern can be a difficult one to make. If you are acting in good faith, you should have nothing to fear because you will be doing your duty to your employer and those for whom you are providing a service.

4.3 The Board of Directors, CEO, Headteachers and the LGB will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith.

- 4.4 Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary, redundancy or other procedures you may be involved in.
- 4.5 If you do raise a concern in good faith under this policy, you will not be at risk of losing your job or suffering any form of retribution as a result. Provided you are acting in good faith, it does not matter if you are mistaken. Of course, this assurance is not extended to someone who maliciously raises a matter that s/he knows to be untrue.

## **5. Confidentiality**

- 5.1 All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness in which case you will be informed beforehand.

## **6. Anonymous Allegations**

- 6.1 This policy encourages you to put your name to your allegation whenever possible.
- 6.2 Concerns expressed anonymously are much less powerful but may be considered at the discretion of the Board of Directors.
- 6.3 In exercising this discretion the factors to be taken into account would include:
- the seriousness of the issues raised;
  - the credibility of the concern;
  - the likelihood of confirming the allegation from attributable sources; and
  - whether the allegations are likely to have been made in good faith.

## **7. Untrue Allegations**

- 7.1 If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you in accordance with the CtkCC Disciplinary Policy.

## **8. How to raise a Concern**

- 8.1 As a first step, you should normally raise concerns with your Headteacher who will report the matter to the CEO and LGB. However, if s/he is the potential transgressor you should raise your concern with the CEO but if s/he is a potential transgressor you should contact the Chair of the Board of Directors. Not every concern raised will be treated as a confidential disclosure under this policy. Some concerns will be investigated and dealt with under alternative policies and procedures e.g. disciplinary matters will be dealt with under the disciplinary policy.
- 8.2 You may wish to contact your trade union for advice and guidance.
- 8.3. Concerns may be raised verbally or in writing. Employees who wish to make a written report are invited to use the following format:
- The background and history of the concern (giving relevant dates);
  - The reason why you are particularly concerned about the situation.

You should also, as far as possible, provide evidence to support your concern.

- 8.4 The earlier you express the concern the easier it is to take action.
- 8.5 Although you are not expected to prove beyond doubt the truth of an allegation, you must act in good faith and you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.

- 8.6 Advice and guidance on how matters of concern may be pursued can be obtained from either the Headteacher, the Chair of the LGB of the relevant academy or your trade union.
- 8.7 If you feel unable or do not wish to discuss your concerns with the Headteacher, the LGB or the Board of Directors, you can contact [Protect, Speak Up, Stop Harm](#) for free confidential whistleblowing advice. Their telephone number is 020 3117 2520.
- 8.8 You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.
- 8.9 You can be accompanied by a companion during any meetings or interviews in connection with the concerns you have raised.

## **9. How will the Board of Directors or Local Governing Body Respond?**

- 9.1 If you have informed the Headteacher, LGB, CEO or Board of Directors of your concern, they will look into it to assess initially what action should be taken. This may involve an internal inquiry or a more formal investigation. You will be told who will be handling the matter, how you can contact him/her and whether your further assistance may be needed.
- 9.2 While the purpose of this policy is to enable the Directors/LGB to investigate possible malpractice and take appropriate steps to deal with it, the Directors/LGB will give you as much feedback as it properly can.
- 9.3 Concerns or allegations which fall within the scope of specific procedures (for example grievance) will normally be referred for consideration under that relevant procedure. Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.
- 9.4 Where appropriate, the matters raised may:
- be investigated by the LGB, the Headteacher, the Academy Auditors, Board of Directors or through the disciplinary process;
  - be referred to the police;
  - be referred to the external auditor;
  - form the subject of an independent inquiry.
- 9.5 Usually within 10 working days of a concern being raised, the person looking into the concern will write to the person raising the concern:
- acknowledging that the concern has been received and provide a summary of your concerns;
  - indicating how the matter will be dealt with and how you will be kept informed;
  - giving an estimate of how long it will take to provide a full response;
  - saying whether any initial enquiries have been made;
  - supplying information on support available to you; and
  - saying whether further investigations will take place and if not, why not.
- 9.6 Where any meeting is arranged, off-site if you so wish, you can be accompanied by a companion.

- 9.7 CtKCC will take steps to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings they will arrange for you to receive advice about the procedure.
- 9.8 CtKCC accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints and duties of confidentiality, you will be informed of the broad outcome of any investigation.
- 9.9 At the end of the investigation process a questionnaire will be forwarded to you to ask for feedback on the process and your role in the same. You are asked to complete this in order to enable future revisions of the policy to be carried out effectively.
- 9.10 If you are still not satisfied as to how your concern has been dealt with, you should refer to section 11.

## **10. The Responsible Officer**

- 10.1 The Chair of the Board of Directors has overall responsibility for the maintenance and operation of this policy. That person maintains a record of concerns raised and the outcomes. The record is maintained in a form, which does not endanger the confidentiality of the person raising the concern or indeed that of any person against whom action is taken as a result of the concern being raised or relevant regulators. The Chair of the Board of Directors will report as necessary to the DES and Board of Directors in accordance with these principles on confidentiality.
- 10.2 The Chair of the LGB will maintain a Whistleblowing Register containing all concerns and outcomes that are brought to his/her attention. All Headteachers and/or the CEO and/or LGB members allocated to look into the concern arising from or related to a school must ensure the Chair of the LGB is provided with sufficient details of the concern and outcomes.
- 10.3 As soon as a complaint is received by the Headteacher/LGB/CEO, advice will be sought from CtKCC HR Consultants and the DES as appropriate. The LGB and the CEO will ensure there are sufficient internal arrangements to address the requirements of this policy, including appropriate support for the Headteacher in implementing the policy.
- 10.4 A register of all complaints and their outcomes will be held centrally and confidentially by the DPO.

## **11. How the matter can be taken further**

- 11.1 This policy is intended to provide you with an avenue within CtKCC to raise concerns. The Board of Directors hopes you will be satisfied with any action taken. If you are not, and if you feel it is right to take the matter outside of CtKCC, the following are possible contact points:
- The Board of Directors
  - The designated independent organisation (Public Concern at Work on 020 7404 6609);
  - The external auditor;
  - Your trade union;
  - Your local Citizens Advice Bureau;
  - Relevant professional bodies or regulatory organisations;
  - A relevant voluntary organisation;
  - The Police and/or Health and Safety Executive;
  - The Director – Diocesan Education Service;



- The CtkCC's Internal Audit team;
- Ofsted

11.2 Employees who are concerned about wrongdoing or failures can make disclosures to a person or body, which has been prescribed by the Secretary of State for the purpose of receiving disclosures about the matters concerned. An employee making such a disclosure should ensure that he or she:

- makes the disclosure in good faith;
- reasonably believes that the information, and any allegation it contains, are substantially true; and
- reasonably believes that the matter falls within the description of matters for which the person or body has been prescribed (for example, breaches of health and safety regulations can be brought to the attention of the Health and Safety Executive or appropriate local authority, or environmental dangers can be notified to the Environment Agency). Public Concern at Work will be able to assist with details of the prescribed organisations and provide appropriate advice.

11.3 An employee who makes a disclosure about a relevant failure which is exceptionally serious will be protected if the employee:

- makes the disclosure in good faith;
- reasonably believes that the information disclosed, and any allegation contained in it, are substantially true; and
- does not act for personal gain.

11.4 It must be reasonable for the employee to make the disclosure in view of all the circumstances, having regard in particular to the identity of the person to whom the disclosure is made.

11.5 Before making disclosures externally the employee must reasonably believe that the information shows one or more of the following matters is either happening now, took place in the past, or is likely to happen in the future:

- a criminal offence;
- the breach of a legal obligation;
- a miscarriage of justice;
- a danger to the health or safety of any individual;
- damage to the environment;
- deliberate covering up of information tending to show any of the above five matters."

11.6 If you do take the matter outside of the LGB or the DES, you should ensure that you do not disclose confidential information. If necessary seek advice on this aspect.

## 12. Whistleblowing with regard to Safeguarding

12.1 The following guidance is taken from Keeping Children Safe in Education Part One:

### **“What school or college staff should do if they have concerns about safeguarding practices within the school or college**

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or college's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

Appropriate whistleblowing procedures, should be put in place for such concerns to be raised with the school or college's senior leadership team.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance can be found at- [Advice on whistleblowing](#)
- The [NSPCC what you can do to report abuse dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).<sup>1</sup>

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<sup>1</sup> Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain, Road, London EC2A 3NH.

## Record of Amendments

Number	Brief Description	Date	Amended By
1	CEO added 4.1 to 4.3	7/11/2023	TM
2	LGB removed from 6.2	7/11/2023	TM
3	Directors added to 9.2	7/11/2023	TM
4	Information added about DPO 10.4	7/11/2023	TM