St. Margaret Mary's Catholic Junior School

Pilch Lane
Liverpool
L14 0JG

Whistleblowing Policy 2026-27 & Anti-Fraud and Corruption Policy Statement

Committee to approve/ratify policy	FGB
Policy Co-ordinator	Lee Pimblett
Date of approval/ratification by Committee	30th September 2026
Date for renewal	September 2027
Signature of the Chair of the Committee	

Mission Statement:

Loving, learning, growing together with Jesus

ST MARGARET MARY'S CATHOLIC JUNIOR SCHOOL

HUMAN RESOURCE POLICIES, PROCEDURES AND PRACTICES

SECTION:	**3**	Employment Practices	**REFERENCE:**	**SMMJ**
SUBJECT:		Confidential Reporting Procedure (Whistle Blowing)	**DATE:02/03/09**	

APPLICABLE TO:	All school employees
STATUS:	Policy/Procedure
SOURCE:	School Governing Body

1. PREAMBLE

1.1 This School is committed to the highest possible standards of openness, probity and accountability. In accordance with that commitment we expect employees and others with whom we deal, who have serious concerns about any aspect of the School's work to come forward and voice those concerns.

1.2 This Procedure document makes it clear that employees can do so without fear of victimisation, subsequent discrimination or disadvantage. The Procedure seeks to enable employees to raise serious concerns within the School rather than overlooking a concern or raising that concern out the School.

1.3 The Procedure applies to all employees and those contractors working for the School on School premises, for example, agency staff, builders and drivers. It also covers suppliers and those providing services under a contract with the School in their own premises, for example, care homes.

1.4 The Procedure is in addition to the School's complaints procedures and other relevant statutory reporting procedures applying to certain Departments. The Procedure is also designed to sit along the Schools' Anti-fraud policy statement which outlines the School's determination to combat fraud within the School and also to complement other procedures relating to irregularities or improper behaviour which occurs within the workplace.

2. AIMS AND SCOPE OF THE PROCEDURE

2.1 This Procedure aims to:

- allow employees to feel confident in raising serious concerns about issues relating to School practices and procedures
- provide avenues for employees to raise those concerns and receive feedback on any action taken
- ensure that employees receive a response to concerns raised and that employees are aware of how to pursue those concerns further if necessary

- reassure employees that they will be protected from possible reprisal or victimisation if they have a reasonable belief that they have made any such disclosure in good faith.

2.2 There are existing procedures in place to enable employees to lodge a grievance relating to their own employment. The Confidential Reporting Procedure is intended to cover major concerns that fall out the scope of the grievance procedures. Such concerns include:

- conduct which breaches the School's standing orders and financial regulations
- conduct which is illegal
- disclosures relating to miscarriages of justice
- health and safety risks, include risks to the public as well as other employees
- damage to the environment
- sexual or physical abuse of clients, or
- other unethical conduct

2.3 Thus, any serious concerns that employees have about any aspect of service provision or the conduct of employees or Members of the School or others acting on behalf of the School can be reported under the Confidential Reporting Procedure. This may be about something that:

- makes an employee feel uncomfortable in terms of generally acceptable standards, their own experience or the standards they believe the School subscribes to, or
- is contrary to the School's Standing Orders and policies, or
- falls below accepted standards of practice, or
- amounts to improper conduct.

2.4 This Procedure does not replace the School's complaints procedure, or any other School procedures.

3. SAFEGUARDS

3.1 The School recognises that the decision to report a concern can be a difficult one to make. Thus the School will fully support any employee who reports, in good faith, any concerns that he/she has.

3.2 The School will not tolerate any harassment or victimisation [including informal pressures] of employees who report concerns and will take appropriate action to protect employees who raise a concern in good faith.

3.4 Any investigation into allegations made under this Procedure will not influence or be affected by any Disciplinary or Redundancy Procedures in relation to employees who raise concerns under this Procedure.

4. CONFIDENTIALITY

4.1 All concerns will be dealt with in confidence and every effort will be made not to reveal the identity of an employee who raises a concern.

4.2 If however a concern leads to disciplinary action against an employee who is accused of improper conduct, it may be necessary for any employee[s] who raised the concern to give evidence as a witness in disciplinary proceedings, or to provide information to an out body i.e., the Police.

5. ANONYMOUS ALLEGATIONS

5.1 Concerns expressed anonymously may be considered at the discretion of the School. However employees are encouraged to put their name to any concerns raised to aid investigation of those concerns.

5.2 In exercising discretion in relation to anonymous allegations the factors to be taken into account would include:

- the seriousness of the issues raised
- the credibility of the allegation; and
- the likelihood of confirming the allegation from attributable sources

6. UNTRUE ALLEGATIONS

If an employee makes an allegation in good faith, but it is not substantiated by the investigation, no action will be taken against that employee. If, however, an employee makes an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against that employee.

7. THE PROCEDURE FOR RAISING CONCERNS

7.1 As a first step, employees should normally raise concerns in writing with their immediate Line Manager. This depends, however, on the seriousness and sensitivity of the issues involved and who is involved. If employees feel unable to raise concerns with their own Line Manager the concern should be addressed to the Headteacher. If the employee feels unable to do this, concerns should be expressed to the Governing Body, c/o Chair of Governors, School.

7.2 Advice/guidance on how to pursue matters of concern may be obtained from the Chair of Governors or Head Teacher of School.

7.3 Employees who wish to make a written report are encouraged to use the following format:

- the background and the nature of the concern [giving relevant dates];
- the reason why he/she is particularly concerned about the situation.

7.4 Although employees are not expected to prove beyond doubt the truth of an allegation, they will need to demonstrate to the Confidential Reporting Panel that there are reasonable grounds for concern.

7.5 Employees may wish to consider discussing concerns with a colleague and may find it easier to raise the matter if there are two [or more] people who have had the same or similar experience or concerns.

7.6 In summary therefore, concerns can be reported to the employees' line manager, Head Teacher, or the Governing Body of School who will deal with the complaint in accordance with section 8 below.

8. HOW THE SCHOOL WILL RESPOND

8.1 The School will respond to all concerns raised except those anonymous allegations where discretion is exercised not to do so as outlined in Paragraph 5.2 of this Procedure

8.2 If a concern is raised, initial enquiries will be made by the person(s) receiving the complaint, to decide whether an investigation is appropriate and, if so, what form it should take. Some concerns may be resolved by agreed action without the need for investigation. The overriding principle is to act in the public interest.

8.3 Concerns or allegations which fall within the scope of specific procedures [for example, child protection, discrimination, or disciplinary issues] will normally be referred to the appropriate person(s) for consideration under those procedures. If urgent action is required this will be taken before any investigation is conducted. If it is decided that an investigation is required, this may be undertaken using the School's existing procedures and/or by involving the police and/or district audit.

8.4 Within ten working days of a concern being raised, the employee will be contacted by the appropriate officer:

- to acknowledge that the concern has been received
- to indicate how the School proposes to deals with the matter
- supplying information on staff support mechanisms, and
- stating whether further investigation will take place and if not,
- why not.

8.5 The level of contact between the persons investigating the concern and the employee[s] who raised the initial concern will depend on the nature of the concern, the potential difficulties involved and the complexity of the information provided. If necessary, further information will be sought from the employee[s] who raised the initial concerns.

8.6 Where any meeting is arranged, if he/she so wishes, the employee[s] who raised the initial concerns can be accompanied by a union or professional association representative or a friend.

8.7 This Procedure seeks to minimise any problems which may arise as a result of raising a concern. For instance, if required to give evidence in criminal or disciplinary proceedings, the employee will be given advice and guidance on the procedures.

8.8 The School accepts that employees need to be assured that the matter has been properly addressed. Subject to legal constraints, any employees who raise initial concerns will be informed of the outcome of any investigation

9. THE RESPONSIBLE BODY

The Governing Body has overall responsibility for the maintenance and operation of this Procedure, and will maintain a record of concerns raised and the outcome of any investigation.

10. HOW THE MATTER CAN BE TAKEN FURTHER

10.1 This Procedure is intended to provide an avenue within the School to raise concerns. If employees are dissatisfied and feel it is right to take the matter out of the School, they have the right to do so. This should normally be done after the conclusion of the School's investigation into the employee[s] concerns.

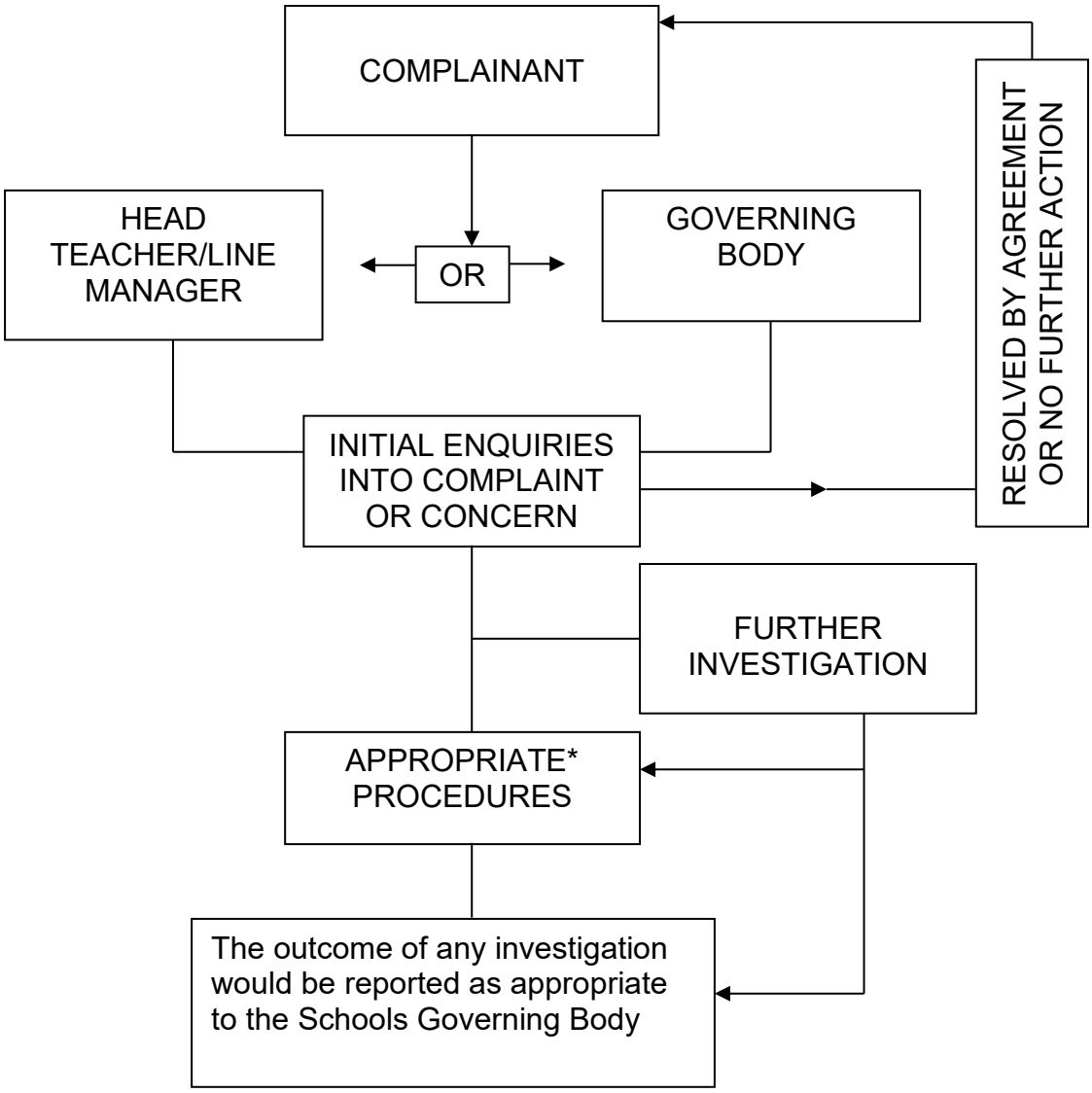
This Procedure if properly applied should prevent the need for such action by employee[s].

10.2 If concerns are raised out the School by employees, they must endeavour to protect the confidentiality of matters relating to the School's business and its employees.

10.3 The School accepts that there may be circumstances where employees can properly report matters to outside bodies e.g. The Police, The Health and Safety Executive etc. Provided that the employee has acted honestly and reasonably he/she will be protected from any Disciplinary Action arising from such disclosures. However, this Procedure has been devised to minimise the need for employees to report matters to outside bodies or agencies. Employees must therefore be able to justify external disclosures.

St Margaret Mary's Catholic Junior School

CONFIDENTIAL REPORTING PROCEDURE



Governing Body:
Chair of Governors
Governing Body
Head Teacher
School Business Manager

*Appropriate Procedures:
HR Policies
Police
Financial Irregularities
District Audit

SMMJ - ANTI-FRAUD AND CORRUPTION POLICY STATEMENT

1. Introduction

Fraud occurs when a person unlawfully obtains the property or money of another person or persons, or attempts to do so, by falsification of records. Fraud is intentional deceit and includes offences such as embezzlement, false pretences, forgery, bribery, corruption, and falsification of accounts. For the purposes of this policy statement, fraud also includes the physical theft of assets. Employees can be exposed to pressures from contractors and the public to act in a particular way, which may involve preferential treatment in accessing all types of services, benefits, and funds. Such behaviour constitutes corruption.

2. Culture and Stance

St Margaret Mary's Catholic Junior School are committed to combating fraud and corruption, wherever it may be found. It is determined to eliminate fraud and corruption by those who attempt to obtain assets or services from the school to which they are not entitled, and by employees or governors who abuse their positions of trust.

The openness, integrity, and accountability of the employees and governors form the cornerstone of effective governance. The reputation of the school depends on the standards of behaviour of all associated with it, whether employee, governor, supplier or contractor. Therefore, the school requires its governors and employees to demonstrate the highest standard of integrity at all times.

These standards are clearly laid out in the staff and governor code of conduct, each of which include the requirement to complete Registers of Interest and Gifts & Hospitality.

The school disciplinary procedures require that managers take firm and appropriate action, wherever fraud or corruption by employees has been suspected or discovered.

Any individual reasonably believing that a governor's conduct fails to comply with their code of conduct should make a written allegation to that effect to the Chair of Governors or Head Teacher as soon as practicable.

In the school financial procedures, the school has clear guidance in relation to the process required around the offering or giving of gifts, rewards, or any other inducements in relation to the obtaining or performance of a contract. The consequence of such acts is that the school can cancel the relevant contract and recover from the contractor the amount of any loss resulting from the cancellation. Such actions may also lead to prosecution.

School may support surveillance by the Council's Counter Fraud and Internal Audit Service, or any other investigatory team if conducted in accordance with the Regulation of Investigatory Powers Act 2000 to ensure that surveillance is properly conducted, and authorised, while protecting the rights of the subject.

The school wholeheartedly supports the police and other external agencies in fighting fraud and corruption within the public sector and has established arrangements for co-operation and joint working with these other bodies.

Any employees found to be acting fraudulently will be subject to disciplinary action.