



CATS
GLOBAL SCHOOLS

Whistleblowing Policy

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1. Policy Statement

This policy applies to all individuals working at all levels of the organisation, including senior managers, directors, employees, consultants, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff (collectively referred to as staff in this policy). Other individuals performing functions in relation to the Company, e.g. self-employed contractors, are also encouraged to use it.

The Company is committed to conducting business with honesty and integrity and we expect all staff to maintain high standards. We encourage staff to report suspected wrongdoing as soon as possible. It is important to the Company that any fraud, misconduct or wrongdoing by workers of the business is reported and properly dealt with. The Company therefore encourages all staff to raise any concerns that they may have about the conduct of others in the organisation or the way in which the organisation is run. This policy sets out the way in which staff may raise any concerns that they have and how those concerns will be dealt with.

2. Background

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

- Any safeguarding concern relating to staff or students;
- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach of any other legal obligation; or
- concealment of any of the above.

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 Company's activities (a whistleblowing concern) you should report it under this policy.

The individual worker has no responsibility for investigating the matter; it is the Company's responsibility to ensure that an investigation takes place.

It is understandable that whistleblower's are sometimes worried about possible repercussions. The Company aims to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Staff 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 an employee believes that they have suffered any such treatment, the employee should inform the People & Engagement (P&E) department immediately. If the matter is not remedied the employee should raise it formally using the Company's Grievance Procedure.

The Company encourages staff to raise their concerns under this procedure in the first instance. If a worker is not sure whether or not to raise a concern, he/she should discuss the issue with his/her line manager or the P&E Department.

3. Principles

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Workers should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the worker who raised the issue.
- No worker will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the worker will not be prejudiced because he/she has raised a legitimate concern.
- Victimisation of a worker for raising a qualified disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this procedure the Company's disciplinary procedure will be used, in addition to any appropriate external measures.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager,

workers should not agree to remain silent. They should report the matter to a Director.

- If the Company concludes that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

4. Stages of Procedure

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.

1. In the first instance, and unless the worker reasonably believes his/her line manager to be involved in the wrongdoing, or if for any other reason the worker does not wish to approach his/her line manager, any concerns should be raised with the worker's line manager. If he/she believes the line manager to be involved, or for any reason does not wish to approach the line manager, then the worker should proceed straight to stage 3.
2. The line manager will arrange an investigation of the matter, with the support of the P&E Department, (either by investigating the matter him/herself or immediately passing the issue to someone in a more senior position). The investigation may involve the worker and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above. The worker's statement will be taken into account, and he/she will be asked to comment on any additional evidence obtained. The Investigating Manager will report the findings of the investigation to the Group P&E Director, who will take any necessary action. If disciplinary action is required, the Investigating Manager will report the matter to the Group P&E Director and start the disciplinary procedure. On conclusion of any investigation, the worker will be told the outcome of the investigation and what the Company has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.
3. If the worker is concerned that his/her line manager is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigations to the Group P&E Director, he/she should inform Group P&E Director, who will arrange for another Investigation Manager to review the investigation carried out, make any necessary enquiries and make his/her own report to the Group P&E Director as in stage 2 above.

4. If on conclusion of stages 1, 2 and 3 the worker reasonably believes that the appropriate action has not been taken, he/she should report the matter to the proper authority. 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. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external.

- Protect, an independent whistleblowing charity (helpline: 020 3117 2502, email: whistle@protect-advice.org.uk, website: www.pcaw.co.uk).
- The NSPCC whistleblowing helpline (tel: 0800 028 0285 or email: help@nspcc.org.uk).

5. Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this procedure. However, if you wish to raise a concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating the concern to know your identity, this will be discussed with you.

If there is evidence of criminal activity, the Police will in all cases be informed.

We do not encourage staff to make disclosures anonymously. 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 discuss this with the his/her line manager, the Head/Principal or the P&E Department and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are set out above.



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