



# Whistleblowing Policy

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Going further than others

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## Contents

|                                                          |   |
|----------------------------------------------------------|---|
| Policy Statement.....                                    | 2 |
| Raising your Whistleblowing Concerns Externally .....    | 2 |
| Scope.....                                               | 2 |
| Background .....                                         | 3 |
| Principles.....                                          | 4 |
| Stage 1 – Raising a Whistleblowing Concern.....          | 4 |
| Stage 2 – Responding to your Whistleblowing Concern..... | 5 |
| Stage 3 – Appeal .....                                   | 5 |
| Confidentiality and Anonymity.....                       | 6 |
| Our Commitment to You .....                              | 6 |
| Further Guidance.....                                    | 7 |

## Policy Statement

Whistleblowing is one of the most effective ways of preventing and eliminating wrongdoing at work. We recognise that raising a whistleblowing concern can be daunting. However, we encourage you to report concerns internally as soon as possible where you suspect wrongdoing. We are here to listen and will take all concerns that you raise seriously.

This policy sets out the procedure for raising a whistleblowing concern and the support and protection that is available to you when you do so.

If your concern relates to a personal grievance that is not in the public interest (for example, an allegation of bullying or harassment, or an allegation that your contract of employment has been breached), you should raise it under our separate grievance procedure. If you are unsure about whether your concerns are best dealt with under the whistleblowing policy or grievance procedure, please speak to the People & Engagement (HR) department for further advice.

This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

## Raising your Whistleblowing Concerns Externally

We encourage you to raise your whistleblowing concerns internally in the first instance. If you feel that appropriate action has not been taken, you should report the matter to the correct prescribed body or person (see list on [GOV.UK](https://www.gov.uk)).

You should seek advice if you are thinking of raising your concern with the media as you will not have protection under whistleblowing laws unless certain conditions are met.

We strongly encourage you to seek advice before reporting a concern to anyone external.

## Scope

This policy applies to all individuals working at all levels of the organisation, including senior managers, directors, employees, consultants, trainees, homeworkers, part-time and fixedterm 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.

## Background

Whistleblowing is the act of reporting suspected wrongdoing or risk of wrongdoing relating to:

- a safeguarding concern relating to staff or students which you do not believe has been handled correctly, or a systemic concern about safeguarding in your school or business unit;  
**Note that specific safeguarding concerns should always first be raised as set out in the safeguarding policy, those regarding students usually to the DSL, those regarding staff, volunteers or contractors to the Head, those regarding the Head to the Chair of Governors (chairofgovernors@catsglobalschools.com)**
- a criminal offence;
- a failure to comply with a legal obligation;
- a miscarriage of justice;
- a risk to the health and safety of an individual;
- damage to the environment; or
- an attempt to cover up any of the above.

It is not necessary for you to prove the wrongdoing. However, to be protected by whistleblowing laws against detrimental treatment or dismissal, you must reasonably believe that wrongdoing (related to one of the categories listed above) is being, has been, or is likely to be committed and that your disclosure is in the public interest.

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 whistleblowers 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 HR 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 HR Department.

## 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.

## Stage 1 – Raising a Whistleblowing Concern

If you have a genuine concern relating to any type of wrongdoing that is covered under this policy, you should raise it with your line manager. If your concern relates to your line manager, or for any reason you do not wish to approach your line manager, you should raise your concern with the Group HR Director.

You can raise your concern orally, or in writing. We recommend that you use our Form to raise a whistleblowing concern. It is important that you set out clearly:

- the details of the suspected wrongdoing;
- the names of any individuals involved; and
- and what action (if any) you are seeking.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your concern. This will be arranged as soon as possible. Where it is considered appropriate, a member of the HR department may also be present.

## Stage 2 – Responding to your Whistleblowing Concern

The manager to whom you raise your concern will decide if an investigation is required, with the support of the HR Department, and, if it is, the most appropriate person to conduct it. The relevant manager will write to you confirming that they are conducting an investigation and the timescale for completion.

The level of investigation and time this will take will vary depending on the nature of the suspected wrongdoing.

The investigation may involve the worker and other individuals involved giving a written statement. 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 HR Director, who will take any necessary action. If disciplinary action is required, the Investigating Manager will report the matter to the Group HR Director and start the disciplinary procedure.

Following the investigation, the relevant manager will inform you in writing, as quickly as possible after completion of the investigation, of the outcome and any next steps or action that will be taken. If no action is to be taken, the reason for this will be explained. While we aim to provide you with comprehensive feedback, in some cases this may not be possible, for example where data protection rules apply or there are sensitive issues that need to remain confidential.

## Stage 3 – Appeal

If you are not satisfied with how your concern has been dealt with, you should appeal to the Group HR Director.

You can raise your appeal orally, or in writing. It is important that you set out clearly the grounds of your appeal, i.e. the basis on which you consider that your original concern has not been satisfactorily dealt with.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your appeal. This will be arranged as soon as possible. Where it is considered appropriate, a member of the HR department may also be present.

The relevant manager will consider your grounds for appeal and review the manner in which your original whistleblowing concern was handled. You will be informed in writing of the outcome as quickly as possible.

## Confidentiality and Anonymity

We want you to feel comfortable about raising a whistleblowing concern openly and actively encourage you to do so.

Where you raise a whistleblowing concern openly, we will maintain your confidentiality as far as possible. If we need to identify your identity to anyone, we will notify you beforehand. In the alternative, you may decide to raise a whistleblowing concern anonymously.

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 his/her line manager, the Head/Principal or the HR Department and appropriate measures can then be taken to preserve confidentiality.

## Our Commitment to You

You have the right not to be subjected to any detrimental treatment (including being unfairly penalised, disciplined or dismissed) because you have raised a whistleblowing concern.

If you raise a whistleblowing concern in accordance with this policy, we will ensure that you are treated with respect and provided with adequate support and protection.

If you are told not to raise or pursue a whistleblowing concern, or you believe that you have been subjected to detrimental treatment because you have raised a whistleblowing concern, you should report the matter to the HR department. In the alternative, you can raise it under our Grievance procedure if it applies to you.

Any such behaviour will not be tolerated and will be treated as a disciplinary offence. If we find that an individual has knowingly raised false allegations, this will also be treated as a disciplinary offence.

## Further Guidance

If you need further guidance or support, you can contact the whistleblowing charity Protect or Citizens Advice for free confidential advice.

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



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