St. Luke's Primary School
Whistle Blowing Policy

Agreed by the Governing Board: September 2026

Review Date: September 2027

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We are committed to providing the children of St. Luke's with an education, which will equip them for the future. This 'Whistle Blowing Policy' reflects our duties under:

- **The Equality Act 2010**: to eliminate discrimination and not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).
- **The Human Rights Act 1998:** to respect and protect an individual's human rights.
- **The Public Sector Equality**: to show due regard to the need to eliminate unlawful discrimination, harassment, and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not.

Introduction

The Board of Governors has introduced this Code of Practice to establish sound procedures for referral and investigation of any internal reports of malpractice. Such reports can concern fraud or potential fraud but can also cover a range of other things. Recently, the reporting arrangements for such matters has become known collectively as "whistleblowing," and attention has been focused, nationally, on more formalised procedures.

Underpinning the introduction of a formal policy and associated procedures is the view that disclosing genuine malpractice internally is the right course of action. These policies and procedures can also help protect children and vulnerable adults to whom the Board of Governors owes a duty of care.

1. **Preamble**

1.1 Staff may well be the first to realise that there could be something seriously wrong with the school. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the school. They may also fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

1.2 At St. Luke's our practice is rooted in our five HEART school values. The Board of Governors is committed to the highest possible standards of openness, probity, and accountability. In line with that commitment, we encourage employees with serious concerns about any aspect of the school's work (e.g., abuse or

neglect of a child) to come forward and voice those concerns via the complaint's procedure. It is recognised that certain cases will have to proceed on a **confidential** basis. This document makes it clear that staff can do so without fear of reprisals. Indeed, the Whistleblowing Policy and Procedure are intended to encourage and enable staff to raise serious concerns **within** the school rather than overlooking a problem or blowing the whistle outside. This last point is especially important. It is dealt with fully in sections 5 and 7 below.

1.3 These procedures are in addition to the other statutory reporting procedures and existing procedures for dealing with complaints.

1.4 This policy has been consulted on with the professional association and trade union representatives of teaching and support staff and has their support.

2. **Aims and scope of this policy**

2.1 This policy aims to:

- provide avenues for you to raise serious concerns about any aspect of the Council's work and receive feedback on any action taken;
- allow you to take the matter further if you are dissatisfied with the Governing Body's response; and;
- reassure you that you will be protected from reprisals or victimisation for reasonable whistleblowing in good faith.

2.2 There are existing procedures in place to enable you to lodge a grievance relating to your own employment. This whistleblowing policy is not intended to cover concerns that can be progressed under existing personnel procedures, e.g., complaints, child protection, racial or sexual harassment.

A serious concern may be about something that you believe in good faith:

- is unlawful; or
- is against the policies of the school; or
- falls below established standards or practice; or
- amounts to improper conduct; or
- is a health and safety risk to the public as well as other employees; or
- involves damage to the environment; or
- involves the unauthorised use of public funds; or
- involves possible fraud and corruption; or
- involves sexual or physical abuse of clients.

3. **Fraud**

3.1 At this point, special mention should be made of fraud, corruption, and financial irregularity.

3.2 Fraud in the public sector costs the taxpayer hundreds of millions of pounds each year and, in general, detected cases of fraud and corruption are on the increase.

3.3 All public sector organisations are likely to be affected in some way by fraudulent or corrupt activity.

3.4 The Metropolitan Police report that they cannot prosecute over half of fraud and corruption cases because of inappropriate action taken *before* the case is referred to them. Consequently, the action that you take, if/when you first suspect fraudulent activity, may be crucial.

3.5 Because of the importance of this matter some of the following paragraphs concerned with whistleblowing give guidance on what you should and should not do if you suspect fraud in school.

4. **Safeguards**

4.1 **Harassment or Victimisation.**

The Board of Governors is committed to good practice and high standards and wants to be supportive of employees. The Governing Body recognises that the decision to report a concern can be a difficult one to make, not least

because of the fear of reprisal from those responsible for the malpractice. The Board of Governors will not tolerate harassment or victimisation and will take action to protect you when you raise a concern in good faith.

4.2 This does not mean that if you are already the subject of disciplinary, redundancy or other procedure, that those procedures will be halted because of your whistleblowing.

4.3 **Confidentiality**
The Board of Governors will do its best to protect your identity when you raise a concern and do not want your name to be disclosed. It must be appreciated that the investigation process may reveal the source of the information and a statement by you may be required as part of the evidence.

4.4 **Anonymous Allegations**
This policy encourages you to put your name to your allegation. Concerns expressed anonymously are much less powerful. They will be investigated thoroughly although follow-up action will in such cases be at the discretion of the Board of Governors.

4.5 In exercising the discretion, the factors to be considered would include:

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

4.6 **Untrue Allegations**
If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. However, when there are clear grounds for suggesting that you may have acted frivolously, maliciously, or vexatiously, the Board of Governors will undertake a disciplinary investigation. Dependent on the outcome, disciplinary action may then follow.

5. **How to raise concern**

5.1 If you suspect fraud, corruption, or financial irregularity, you should always inform the Chief Auditor directly. No other officer needs to be contacted as the Chief Auditor will be responsible for progressing matters following notification, including liaising with such other officers as may be necessary.

5.2 For any other type of concern, you should normally, as a first step, raise them with your immediate line manager, their superior or our Headteacher. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in malpractice. For example, if you believe the senior leadership is involved, you should approach the Chair of Governors or alternatively, the Director of Education for the London Borough of Tower Hamlets or the Borough Solicitor.
At St. Luke's our Chair of Governors is:
Michael Blaby.

Michael can be contacted via the Governors' Clerk, Miriam Baguley, at miriam@educationgp.co.uk

If it is a matter related to child protection you may choose to contact the **LADO (LOCAL AUTHORITY DESIGNATED OFFICER)** who for Tower Hamlets is **Melanie Benzie** and her contact details are:
Melanie Benzie,
Local Authority Designated Officer (LADO)
Tel: 020 7364 0677
Mobile Number: 07963 604664
Email: LADO@towerhamlets.gov.uk or secure email: LADO@towerhamlets.gcsx.gov.uk.

You may also choose to contact the **NSPCC's Whistleblowing help line number: 0800 028 0285**.

5.3 Concerns are better raised in writing. You are invited to set out the background and history of the concern, giving names, dates, and places where possible, and the reason you are particularly concerned about the situation. If you do not feel able to put your concern in writing, you can telephone or meet the appropriate officer.

5.4 The earlier you express your concern, the easier it is to act.

5.5 Although you are not expected to prove the truth of an allegation, you will need to demonstrate to the person contacted that there are sufficient grounds for your concern.

5.6 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.

5.7 You may invite your trade union or professional association to assist you in raising a matter and may wish to seek their advice prior to initiating this procedure.

6. **How the council will respond**

6.1 The Council will respond to your concerns. Do not forget that testing out your concerns is different from either accepting or rejecting them.

6.2 The action taken by the Council will depend on the nature of the concern. The matters raised may:

- be investigated internally
- be referred to the Police
- be referred to the external Auditor
- form the subject of an independent inquiry

6.3 To protect individuals and the Board of Governors, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle, which the Council will have in mind, is the public interest. Concerns or allegations that fall within the scope of specific procedures (for example, child protection or discrimination issues) will normally be referred to for consideration under those procedures.

6.4 Some concerns may be resolved by agreed action without the need for investigation.

6.5 Within ten working days of a concern being received, the Council will write to you:

- acknowledging that the concern has been received.
- indicating how it proposes to deal with the matter.
- giving an estimate of how long it will take to provide a final response.
- telling you whether any initial enquiries have been made; and
- telling you whether further investigations will take place, and if not, why not.

6.6 The amount of contact between the officer considering the issue and you will depend on the nature of the matter raised, the potential difficulties involved, and the clarity of the information provided. If necessary, further information will be sought from you.

6.7 When any meeting is arranged off site if you wish, you have the right, if you so wish, to be accompanied by a union or professional association representative or a friend who is not involved in work to which the concern relates.

6.8 The Council and Board of Governors will take steps to minimise any difficulties which you may experience because of raising concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, the Council will advise you about the procedure.

6.9 The Council accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, you will receive information about the outcome of any investigation.

7. **How the matter can be taken further if necessary**

7.1 This policy is intended to provide you with a clear route to raise concerns **within** the Council and for the concerns to be dealt with and settled appropriately. However, if you feel that this has not happened, and if you feel it is right to take the matter outside the Council, please contact either:

- the external auditor (the District Audit Service, 4th Floor, Millbank Tower, Millbank, London, SW1P 4QP. Telephone number 0171 233 6400); or
- the Police (where your concern relates to a criminal matter).

7.2 Please use **only** these routes to raise concern externally. Complaints made to other bodies, individuals or the media may hamper a speedy, full, and professional investigation of the concern that you have expressed.

7.3 Information which is provided to you on a confidential basis, must be treated as such and this may only be overridden where there is a clear public interest in disclosing it and you act in good faith and reasonably. You would need to ensure that you could justify your disclosure because it would be a serious betrayal of trust to use confidential information for any personal advantage, or for malicious or other improper reasons.

8. **Record keeping**

8.1 The Chair of the Board of Governors has overall responsibility for the maintenance and operation of this policy. They maintain a confidential record of concerns raised and the outcomes (so as not to endanger your confidentiality) and will report as necessary to the Board of Governors.

9. **Check list of dos and don'ts**

9.1 Lastly, some of the key points from the procedure on whistleblowing are summarised below:

DO

(a) **Make an immediate note of your concerns**

Note all relevant details such as what was said on the telephone or other conversations, the date, time, and the names of any parties involved.

(b) **Convey your suspicions to someone with the appropriate authority and experience.**

- *To the Chief Auditor for suspected fraud, or corruption or financial irregularity.*
- *Usually, to your immediate line manager or their supervisor for other matters (but see paragraph 5.2 above for more details).*

(c) **Deal with the matter promptly if you feel your concerns are warranted.**

In a case of suspected fraud, it is important to remember that any delay may cause the Governing Body to suffer further financial loss.

DON'T

(a) **Do nothing**

(b) **Be afraid of raising your concerns.**

- *You will not suffer any recrimination from the Governing Body or the Authority, because of raising in good faith a serious concern.*
- *The Board of Governors will treat any matter you raise sensitively and confidentially.*

(c) **Approach or accuse any individuals directly.**

(d) **Try to investigate the matter yourself.**

There are special rules surrounding the gathering of evidence for use in disciplinary or court proceedings. Any attempt to gather evidence or other information by someone who is unfamiliar with these rules may destroy the case.

(e) **Convey your suspicions to anyone except those with the proper authority and as set out in this policy and procedure.**

10. **Advice and Guidance**

10.1 Further advice and guidance on how a matter may be pursued under this policy can be obtained from the Director of Education.