



## **Pope John XXIII Catholic Multi-Academy Company**

# **WHISTLEBLOWING POLICY**

**Approved by Finance and Resources Committee: -15<sup>th</sup> Septembers 2015**

**Ratified by the Board of Directors:**

**Date of Review: 1<sup>st</sup> September 2018**

**For: Corpus Christi Catholic Primary Academy  
Holy Rosary Catholic Primary Academy  
Our Lady and St Chad Catholic Academy  
' St Mary's Catholic Primary Academy**

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**Whistleblowing Policy**

**1. General and definition**

1.1 Whistleblowing is the disclosure by an employee of what they consider to be malpractice by a co-worker or manager. This malpractice may constitute any behaviour felt to be detrimental to the best interests of the Pope John XXIII Multi Academy Company (MAC), its stakeholders and its employees. Specific examples of issues covered by the Whistleblowing Policy include:

1. Any unlawful act.
2. Health and safety issues.
3. Damage to the environment.
4. Unauthorised use of public funds.
5. Fraud and corruption of any description.
6. Inappropriate or improper conduct (including bullying or harassment).
7. Serious failure to comply with appropriate professional standards.
8. Breach of the MAC's Constitution or other policy or code of practice.
9. Discrimination of any kind.
10. Any form of unethical conduct.

1.2. The MAC's Whistleblowing Policy does not apply to raising grievances about an employee's personal situation. Any such concerns should be raised under the MAC's Grievance policy. It does not apply to child protections matter which are covered by the MAC's Safeguarding Policy

1.3. Provided that you act in good faith, and that you have a reasonable suspicion that the alleged malpractice has occurred, is occurring or is likely to occur, you can disclose your concerns, using this procedure, and be protected by law from victimisation or dismissal. The law in question is the Public Interest Disclosure Act, which came into force in 1999. Although not strictly required by the Act, the MAC's internal procedures give effect to it. The company believes that having internal procedures is in everyone's interest.

**2. Aims of the Policy**

2.1 The aims of the MAC's Whistleblowing Policy are as follows:

1. Encourage employees to feel confident about raising concerns and to question and Acton those concerns.
2. Provide ways for employees to raise concerns and receive feedback on any action taken as a result.
3. Reassure employees that if they raise concerns in good faith and reasonably believe them to be true, they will be protected from possible reprisals or victimisation.
4. Ensure that employees are aware of options available to them if they are dissatisfied with the MAC's initial response.

**3 What groups are covered by the Policy?**

3.1 The MAC's Whistleblowing Policy applies to all of the following groups

:

1. All employees (including part time and temporary staff)
2. Agency staff working for the MAC
3. Contractors and suppliers
4. Organisations working with the MAC under partnership arrangements
5. Service users and stakeholders

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**4 What assurance does the Whistleblowing Policy provide?**

- 4.1 Individuals raising concerns under the Whistleblowing Policy will not be at risk of any form of retribution or sanction, including losing their job or contract with the MAC, provided that
- 1 The disclosure is made in good faith
  2. There is a genuine and reasonable belief that the information, and any allegations contained in it, is substantially true
  3. The disclosure is not motivated by personal gain
- 4.2 The MAC will not tolerate the harassment or victimisation of anyone raising a genuine concern. However, where matters which are known to be untrue are raised maliciously, it is likely that disciplinary action will be taken against perpetrators

**5. Raising a Concern/ Making a Disclosure/**

- 5.1 The MAC has set up the following mechanisms for employees to report their concerns:

**To make a disclosure either telephone or write to the Accounting Officer listed at the end of the policy. If writing, mark the envelope: 'Strictly Private and Confidential'.**

Concerns/disclosures may be raised verbally or in writing but you are advised not to use email, as email is not a secure medium and should not be used. The Accounting Officer will acknowledge receipt of your disclosure in writing, within 5 working days. They will also gather further information if need be, including by personal interview, at which you can be accompanied by an official of your trade union or professional association, or by a fellow employee.

- 5.2 Alternative lines of communication for reporting concerns include an employee's line manager, Head of Department/Curriculum Area, Business Director, Principal, Chair of Academy Committee and Chair of the Board of Directors. You may wish to contact them in the first place, unless they are the subject of your concern/disclosure.
- 5.3 Anonymous allegations will be considered and action taken where appropriate, it is much more difficult to properly investigate matters raised anonymously. The Whistleblowing Policy is designed to protect staff raising genuinely held concerns and individuals utilising the provisions of the policy are encouraged to identify themselves. Obviously, feedback relating to any investigation which has been undertaken can only be provided where contact details are known.

**6. Confidentiality**

The MAC will treat your disclosure in confidence and only reveal your identity if absolutely necessary (e.g. if required in connection with legal action).

**7. What will happen next?**

- 7.1 The MAC's response will depend on the nature of the concern that has been raised. In all instances, the MAC will:
1. Record and acknowledge the issue raised and refer it for investigation within three days of receiving the information.
  2. Respect confidentiality – The MAC 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, however, that this is not always possible. The investigation process may reveal the source of the information and a statement by you may be required as part of the

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evidence. The person investigating the matter will be informed of any confidentiality requirements relating to the disclosure.

3. Decide on appropriate action e.g. Audit investigation, other internal investigation, and referral to the police or other external organisation.
4. Subject to any legal constraints, the relevant employee will normally be informed of the final outcome of any investigation undertaken.

**8. What if the person is not satisfied - how can it be taken further?**

- 8.1 If individuals are dissatisfied with action taken by the MAC in respect of issues raised under the Whistleblowing Policy, they should raise their concerns with the Chair of the Board of Directors. If they remain dissatisfied, the following organisations may be contacted for advice:

The Charity Public Concern at Work web address <http://pcaw.co.uk>

The Mac's current external auditors – the Accounting Officer will supply contact details.

- 8.2 In addition, individuals have the option of taking advice from their trade union, the Citizens Advice Bureau, their own legal representation etc.

**Pope John XXIII Multi Academy Company Accounting Officer**

**Mr Karl Russell**

Principal

St Mary's Catholic Primary Academy

Cannock Road

Wolverhampton

WV10

Tel: 01902 308870

This Policy will be reviewed regularly at least 3-yearly

<b>Version 1.0</b>	Date approved by Finance and Resources Committee	15 <sup>th</sup> September 2015
	Date ratified by Board of Directors:	
	Signature of Chair of Board of Directors	