Whistleblowing Policy

St. Francis' College

September 2026

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Introduction

The 'College' refers to all the staff and pupils of the Prep Department and Senior School which includes Early Years Foundation stage (EYFS), Pre-Prep (Key Stage 1), Prep (Key Stage 2), and Senior School (Key Stages 3-5).

Rationale

The College has adopted this policy and the accompanying procedure on whistleblowing to enable members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, injustices, and failure to comply with legal obligations or unethical conduct. The policy also provides, if necessary, for such concerns to be raised outside the organisation.

Elements of the Policy

In accordance with Lord Nolan's Second Report of the Committee on Standards in Public Life, the College's policy on whistleblowing is intended to demonstrate that the College:

- Will not tolerate malpractice;
- Respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- Will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- Will invoke the College's Disciplinary Policy and Procedure in the case of false, malicious, vexatious or frivolous allegations;
- Will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

Procedure

This procedure is separate from the College's procedures regarding grievances. Employees should not use the whistleblowing procedure to raise grievances about their personal employment situation.

This procedure is to enable members of staff to express a legitimate concern regarding suspected malpractice within the College.

Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of ethics, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment.

Confidentiality

Employees who wish to raise a concern under this procedure are entitled to have the matter treated confidentially and their name will not be disclosed to the alleged perpetrator of malpractice without their prior approval. It may be appropriate to preserve confidentiality that concerns are raised orally rather than in writing, although members of staff are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity, then the Police will be informed.

The Investigation

A member of staff or volunteer will be at liberty to express their concern to the Head, Deputy Head or the Bursar. If the concern is about the Head, the member of staff or volunteer will have the right to raise their concern in confidence with the Chair of Governors. Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The member of staff making the allegation will be kept informed of progress and, whenever possible and subject to third party rights, will be informed of the resolution.

A member of staff who is not satisfied that their concern has been properly dealt with will have a right to raise it in confidence with the Board of Governors through the Head or the Bursar.

External Procedures

Where all internal procedures have been exhausted, a member of staff shall have a right of access to an external person/body. This may include (depending on the subject matter of the disclosure) HMRC, the Audit Commission, the Health and Safety Executive and/or the Local Authority Designated Officer (where the disclosure relates to a child protection issue) or the NSPCC Whistleblowing advice line on 0800 028 0285 or email help@nspcc.org.uk

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the employee reasonably believes:

- That exceptionally serious circumstances justify it;
- That the College would conceal or destroy the relevant evidence;
- Where they believe they would be victimised by the College;
- Where the Secretary of State has ordered it.

Malicious Accusations

Deliberately false, or malicious, vexatious or frivolous accusations will be dealt with under the College's Disciplinary Procedures.

Protection from Reprisal or Victimisation

No member of the staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and follow the whistleblowing procedures.

Version Control

Reviewed By:	Head
Authorised By:	Head
Effective From	September 2026
Next Review Due	September 2028