

Whistleblowing Policy for the Detection of Fraud and Corruption

Christ the King RC Primary School



1. Introduction

1.1 The City Council and the Governing Body of the school are committed to the highest standards of openness, probity and accountability. It is the policy of the City Council that all employees are required to exercise proper stewardship of public money and that appropriate internal control procedures are in place to prevent and detect fraud and corruption.

1.2 Although internal controls are the first line of defence against fraud, it is often the case that where fraud does occur the controls are circumvented or ignored. Employees are often the first to realise that there may be something seriously wrong within an organisation. In line with our commitment, we encourage employees and others with serious concerns about any aspect of the school's work to come forward and voice those concerns, without fear or harassment or victimisation.

2. Aims and Scope of this Policy

2.1 This policy applies to all staff of Community and Controlled Schools and is recommended for adoption by voluntary schools where staff are employed by the Governing Body.

2.2 This policy aims to:

- provide avenues for you to raise concerns;
- allow you to take the matter further if you are dissatisfied with the response;
- reassure you that you will be protected from reprisals or victimisation for whistleblowing in good faith;
- reassure you that instances of malpractice or wrongdoing will not be tolerated but will be fully investigated and appropriate action will be taken against all those concerned;
- provide guidance to anyone who wishes to raise concerns and offers them anonymity if they so wish.

3. Definitions of Malpractice/Wrongdoings

3.1 Malpractice/wrongdoings include the following:

Theft:	“The dishonest taking of property belonging to another person with the intention of permanently depriving the owner of its possession.”
Fraud:	“The intentional distortion of financial statements or other records by persons internal or external to the authority which is carried out to conceal the misappropriation of assets or otherwise for gain.”
Corruption:	“The offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person.”

Failure to observe Financial Regulations, Standing Orders, Scheme of Delegation and Terms of Reference.

Failure to observe Directorate Procedures, Health and Safety Regulations and all other relevant laws and legislation.

Failure to take reasonable steps to report and rectify any situation which is likely to give rise to a significant avoidable cost to the Authority or to give rise to serious damage to property.

- 3.2 Where there is doubt about what constitutes malpractice the advice of the Chief Internal Auditor can be sought. (Tel: 793 3290)

4. Internal Controls

- 4.1 The City Council already has in place documented procedures to ensure that there are proper controls in place and the purpose of this statement is to highlight the need to follow these procedures, which are to be found in:

Financial Regulations

Standing Orders

Terms of Reference of Committees and Delegation of Powers

National Code of Local Government Conduct

Register of Interest and Hospitality Received

These procedures will be reviewed on a regular basis and other codes will be introduced as the Anti Fraud and Corruption Strategy is developed.

- 4.2 In addition each school may have their own procedural manuals on how the various duties should be carried out to ensure that there are efficient and effective internal controls.

5. How to Raise a Concern

- 5.1 The first steps depends on the seriousness and sensitivity of the issues involved and who is thought to be involved. If practicable, you should raise your concerns with the Senior Management of the School, or where you believe the Headteacher is involved, the Chair of Governors.

- 5.2 Alternatively, you may wish to invite your trade union or professional association to raise the matter through the whistleblowing procedure on your behalf.

- 5.3 As a further alternative, in cases of a very sensitive nature or where the concerns involve senior staff and/or governors, you may raise the matter externally to the school by reporting to any of the following officers within the Authority:

The Director of Children's Services

Chief Internal Auditor

Director of Corporate Services
Chief Executive
Lead Member for Children's Services
Strategic HR Manager
Children's Services Directorate
Chairman of the Audit Sub-Committee
District Auditor
Public Concern at Work
Greater Manchester Police

You may also contact the Whistleblowing hotline on 0808 100 1235 (Freephone and confidential).

- 5.4 All cases of irregularities must be notified to the Director of Corporate Services.
- 5.5 It is preferable if concerns are raised in writing. If you do not feel able to put your concerns in writing then you may speak in person or by telephone to any of the contacts.
- 5.6 This policy allows for concerns to be raised anonymously. Concerns expressed anonymously are much less powerful, but may be considered taking into account the:
- (i) seriousness of the issues raised;
 - (ii) credibility of the concern; and
 - (iii) likelihood of confirming the allegation from other attributable sources.

However, if there is no evidence other than the anonymous allegation the case is less likely to be substantiated and therefore the case is less likely to proceed.

6. How concerns will be responded to

6.1 The action taken will depend on the nature of the concern.

The matters raised may be:

- (i) investigated internally;
- (ii) referred to the police.

6.2 Concerns or allegations which fall within the scope of other specific procedures, for example child protection, discrimination issues, harassment or bullying issues, should be dealt with under those procedures.

6.3 Any person about whom an allegation is made through the whistleblowing procedure has the right to be represented by a trade union representative or some other person of their choice.

6.4 All cases of suspected malpractice will be fully investigated and the appropriate disciplinary action taken where it is proved. Where it is considered that a criminal

offence has been committed the case will be passed, in every instance, to the Police, for further investigation and possible prosecution.

7. Safeguards

7.1 Harassment or Victimisation

The City Council and the Governing Body will do everything in its powers to protect you from any reprisals, as a result of raising concerns or wrongdoings or malpractice, in good faith.

7.2 Confidentiality

The City Council and the Governing Body will do everything in its powers to protect your identity when you raise a concern and do not want your name to be disclosed. It may be impossible to guarantee confidentiality when a matter is referred to an external organisation.

7.3 Allegations which are unsubstantiated

If you make an allegation in good faith, but it proves to be unsubstantiated, no action will be taken against you. If, however, you make malicious or repeated allegations which have no foundation, then disciplinary action may be taken against you.