

23. WHISTLE-BLOWING POLICY

Introduction

The staff and governors of Westminster Cathedral Choir School seek to run all aspects of School business and activity with full regard for high standards of conduct and integrity. In the event that members of School staff, parents, governors or the School community at large become aware of activities which give cause for concern, Westminster Cathedral Choir School has established the following whistle-blowing policy, or code of practice, which acts as a framework to allow concerns to be raised confidentially and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion.

Throughout this policy, the term whistle-blower denotes the person raising the concern or making the complaint. It is not meant in a pejorative sense and is entirely consistent with the terminology used by Lord Nolan as recommended in the Second Report of the Committee on Standards in Public Life: Local Spending Bodies published in May 1996.

Westminster Cathedral Choir School is committed to tackling fraud and other forms of malpractice and treats these issues seriously. Westminster Cathedral Choir School recognises that some concerns may be extremely sensitive and has therefore developed a system which allows for the confidential raising of concerns within the School environment but also has recourse to an external party outside the management structure of the School.

Westminster Cathedral Choir School is committed to creating a climate of trust and openness so that a person who has a genuine concern or suspicion can raise the matter with full confidence that the matter will be appropriately considered and resolved. The provisions of this policy apply to matters of suspected fraud and impropriety and not matters of more general grievance which would be dealt with under the Westminster Cathedral Choir School complaints procedure.

When might the whistle-blowing policy apply?

The type of activity or behaviour which Westminster Cathedral Choir School considers should be dealt with under this policy includes:

- manipulation of accounting records and finances
- inappropriate use of School assets or funds
- decision-making for personal gain
- any criminal activity
- abuse of position
- fraud and deceit
- inappropriate behaviour around children
- serious breaches of School procedures which may advantage a particular party (for example tampering with tender documentation, failure to register a personal interest)

What action should the whistle-blower take?

Westminster Cathedral Choir School recommends that the whistle-blower raises the matter internally in the first instance to give those School staff and governors who are in positions of responsibility and authority the opportunity to right the wrong and give an explanation for the behaviour or activity. Westminster Cathedral Choir School has designated a number of individuals to specifically deal with such matters and the whistle-blower is invited to decide which of those individuals would be the most appropriate person to deal with the matter.

Mr Neil McLaughlan
Head Master
Westminster Cathedral Choir School
Ambrosden Avenue
London
SW1P 1QH

Tel 0207 798 9395 **Mobile** 07731 778 725

Mr John Gibbs
Chairman of Governors

All staff at WCCS are committed to ***Every Child Matters***: the following five outcomes are key to well-being in childhood and in later life: Being Healthy, Staying safe, Enjoying and achieving, Making a positive contribution and Achieving economic well-being

Westminster Cathedral Choir School,
Ambrosden Avenue
London
SW1P 1QH

Tel 0207 602 4441 **Mobile** 07947 616004

The whistle-blower may prefer to raise the matter in person, by telephone or in written form marked private and confidential and addressed to one of the above named individuals. All matters will be treated in strict confidence and anonymity will be respected wherever possible. In addition information and advice can be obtained from the charity Public Concern at Work. This charity offers free legal advice in certain circumstances to people concerned about serious malpractice at work. Their literature states that matters are handled in strict confidence and without obligation.

Public Concern at Work
3rd Floor, Bank Chambers
6 - 10 Borough High Street
London SE1 9QQ
Telephone (general enquiries and helpline): 020 7404 6609.

Fax: 020 74038823

Email

UK enquiries: whistle@pcaw.co.uk

UK helpline: helpline@pcaw.co.uk

UK services: services@pcaw.co.uk

How will the matter be progressed?

The individual(s) in receipt of the information or allegation (the investigating officer(s)) will carry out a preliminary investigation. This will seek to establish the facts of the matter and assess whether the concern has foundation and can be resolved internally. The initial assessment may identify the need to involve third parties to provide further information, advice or assistance, for example involvement of other members of School staff, the School's external auditors, legal or personnel advisors or the police. Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer(s), possibly in conjunction with the governing body, will consider how best to report the findings and what corrective action needs to be taken. This may include some form of disciplinary action or third party referral such as the police. The whistleblower will be informed of the results of the investigation.

If the whistleblower is dissatisfied with the conduct of the investigation or resolution of the matter or has genuine concerns that the matter has not been handled appropriately, the concerns should be raised with the investigating officer(s) and governing body.

Respecting confidentiality

Wherever possible Westminster Cathedral Choir School seeks to respect the confidentiality and anonymity of the whistleblower and will as far as

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possible protect him/her from reprisals. Westminster Cathedral Choir School will not tolerate any attempt to victimise the whistleblower or attempts to prevent concerns being raised and will consider any necessary disciplinary or corrective action appropriate to the circumstances.

Raising unfounded malicious concerns

Individuals are encouraged to come forward in good faith with genuine concerns with the knowledge they will be taken seriously. If individuals raise malicious, unfounded concerns or attempt to make mischief, this will also be taken seriously and may constitute gross misconduct, and therefore dismissal.

Conclusion

This whistle blowing policy is provided as a reference document to establish a framework within which issues can be raised confidentially internally and if necessary outside the management structure of the School. This document is a public commitment that concerns are taken seriously and will be acted upon.