# Christ Church & Holy Trinity CE Primary Schools Federation
# Reporting a Concern at Work Policy
# October 2025

## Our Christian Vision

**In the Parable of the Sower, Jesus Christ tells us that God is like a generous farmer and we are like the soil in which he plants his seeds. At Christ Church and Holy Trinity Schools, we are learning how to be good soil, so that we grow to love God, our neighbour and ourselves and thereby enable every member of our community to flourish. Each day, we endeavour to face up to all that challenges our growth, in order to see with our eyes, hear with our ears and understand with our hearts God's Good News for the world and to cultivate the virtues with which to produce an abundant harvest.**

## Our Mission

**Christ Church & Holy Trinity Schools are dedicated to providing a nurturing environment in which all children have the opportunity to reach their maximum academic and social potential. Excellent teaching, learning and relationships are at the heart of our schools.**

**We have adopted the RBKC Reporting a Concern at Work policy which is outlined below:**

## Introduction

Christ Church & Holy Trinity are committed to achieving the highest standards of work, including honesty, openness and accountability and recognises the hugely important role employees have in achieving that goal. The Royal Borough will not tolerate any malpractice or wrongdoing in the administration and delivery of its services. The expectation is that employees will want to raise any concerns they have about the way services are being provided, or about possible fraud, theft or corruption issues.

Employees are often the first to realise that there may be something wrong within the school. However, it is recognised that employees may not express any concerns they have because they feel that speaking out could be disloyal to their colleagues or the school. They may also fear harassment or victimisation if they make a statement or allegation. In these circumstances employees may clearly feel it is easier to ignore the issue rather than reporting what may only be a suspicion of fraud, theft or malpractice.

This policy is intended to encourage and enable staff to raise any concerns or suspicions without fear of victimisation or recrimination. The policy applies to all school employees and contractors. The federation has introduced this policy to enable any employee to report their concerns with confidence.

The Governors at Christ Church & Holy Trinity welcome genuine concerns and are committed to dealing responsibly, openly and professionally in response. Without your help we cannot expect to fully protect the interests of the school, its staff and stakeholders.

If something is troubling you, which you think we should know about please use this procedure. If however you are aggrieved about your personal position please use the available grievance procedures already in use in the Royal Borough. These offer specific support and the means to take your issues forward. The concern reporting procedure is primarily for the expression of concerns where the interests of the school, its assets, its users or staff who may be at risk.

## Definitions

Christ Church & Holy Trinity have a range of policies and procedures, which deal with standards of behaviour at work. These include discipline, grievance, bullying, discrimination and harassment and the recruitment and selection process. There may be times, however, where a matter falls outside these areas and should be handled ~~a~~ differently. Examples might be where information on the following areas is being suppressed or the activity is going unreported and unchecked by management:

- Malpractice or ill treatment of a member of staff or child by a member of staff or a criminal act has been or is likely to be committed against that person.
- Suspected fraud against the school.
- Disregard for legislation, particularly in relation to health and safety at work issues.
- Damage to the environment
- Breaches of the school's financial and procurement procedures and the employee Code of Conduct
- Showing undue favour over a contractual matter or a job applicant

## Your Safety

The Governors are committed to this policy. If you raise a genuine concern under this Policy, you will be protected, provided you are acting in good faith. It does not matter if you are mistaken. The Royal Borough will not extend this assurance to someone who maliciously raises a matter they know to be untrue. Employees who knowingly make false accusations can expect to face appropriate disciplinary action.

## Your confidence

The Governors will not tolerate the harassment or victimisation of anyone raising a genuine concern. However, we recognise that you may nonetheless want to raise a concern in confidence under this Policy. If you ask us to protect your identity by keeping your confidence, we will not disclose it without your consent. If the situation arises where we are not able to resolve the concern without revealing your identity (for instance because your evidence is needed in court), we will discuss with you how we will proceed.

## Anonymous Concerns

Remember that if you do not tell us who you are, it will be much more difficult for us to look into the matter or to protect your position. Investigations into anonymously raised concerns are likely to be limited by the sufficiency of the information provided. Anonymous referrals will be followed up at the discretion of the Governors. In exercising that discretion, the factors that will be taken into account will include:

- The seriousness of the matters raised;
- The sufficiency and detail of information provided;
- The credibility of the concern; and
- The likelihood of confirming the allegation and obtaining further evidence from attributable sources.

## What you need to do

As a first step, you should normally raise concerns with the Federation Head Teacher or the Chair of Governors. This depends, however, on the seriousness and sensitivity of the issues involved and who or what is thought to be involved in the malpractice. If you feel management are in some way involved or are condoning the activity, you should approach the Borough HR Section or the Director of Audit, Risk, Fraud & Insurance. If the matter is definitely related to fraud or corruption against the school you should always immediately contact the Director of Audit, Risk, Fraud & Insurance. All matters relating to items covered under the grievance procedures should be referred to HR.

Tri-Borough Director of Audit, Risk, Fraud & Insurance: David Hughes 07817 507695
david.hughes@rbkc.gov.uk

Director for HR & OD, Jamie Davies: jamie.davies@rbkc.gov.uk

The Director of Audit, Risk, Fraud & Insurance operates a secure confidential hotline for employees wishing to raise issues covered in this policy in confidence or anonymously, messages can be left at anytime. They will, depending on the circumstances, either take the lead in investigating matters reported through the hotline or will require local management or sections, such as Health and Safety to undertake their own investigations and report back. Irrespective of who undertakes an investigation your identify will not be divulged by The Director of Audit, Risk, Fraud & Insurance without your permission.

Hotline: 0800 783 2406

The earlier you express the concern, the easier it is to take action. 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.

## How we will handle the matter?

Once you have told us of your concern, we will look into it to assess initially what action should be taken. This may involve an internal inquiry or a more formal investigation. We will tell you who is handling the matter, how you can contact him/her and whether your further assistance may be needed. All matters relating to fraud will be investigated by the Director of Audit, Risk, Fraud & Insurance.

The person undertaking the review is required to acknowledge your referral and once the investigation is underway they are expected to keep you aware of developments, however they will not be able to tell you the precise action and the outcome taken where this would infringe a duty of confidence owed by the school to someone else.

In summary, within 10 days of a concern being received the Governors will write to you:

- Acknowledging that the concern has been received.
- Indicating how the matter will be dealt with and by whom.
- Giving an estimate of the time it will take to provide a detailed and final report on the concerns raised.
- Informing you if any initial enquires have been made.
- Telling you whether further investigations will take place and if not, why not.
- Providing details of staff support mechanisms.

## Independent Advice

Although we would hope this policy gives you the reassurance to report any concerns you may have through the internal channels we recognise that there may be circumstances where you feel unable to follow this process and want external advice and support. This support is available from 'Protect Advice' is a whistleblowing charity which exists specifically to offer legal advice and assistance to employees with concerns.

The Audit Commission (0845 052 2646). This confidential hotline will consider referrals and offer advice on concerns relating to fraud, corruption or wastage of public money.

Trade Unions: employees may wish to be represented by or seek the advice of their staff representative when using the provisions of this policy. The majority of trades unions have issued their own guidance on reporting concerns and the Royal Borough endorses the trades union officers' role in this area. The principal staff side contacts are:

Unison at RBKC: Mr Grant Marshall - 020 7361 2420 (main number for Unison 0800 0857 857)

GMB at RBKC: Mick Aulsberry - 07966 124530

**IN SUMMARY**

**DO**
Make a difference and report your concerns.
Write down all the details of your concern.
Deal with the matter quickly. Any delay could allow the problem to continue and escalate and for evidence to disappear.

**DON'T**
Let it go unreported.
Be afraid to raise concerns and use this policy's protection.
Take matters into your own hands or alert individuals to your concerns.

Signed: *14th October 2025*

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| **Name of School** | Christ Church & Holy Trinity Primary Schools |
| **Policy review Date** | **14/10/25** |
| **Date of next Review** | **October 2026** |
| **Who reviewed this policy?** | Avis Hawkins, Partnership Committee |
| **Ratified by Governors:** | **06/11/25** |