LUX MUNDI

LIGHT OF THE WORLD ~ CATHOLIC ACADEMY TRUST

Whistleblowing Policy

Lux Mundi Catholic Academy Trust

Status Public 2025

APPROVED BY THE BOARD OF DIRECTORS: 24th September 2025

CHAIR'S SIGNATURE:.....

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1. Lux Mundi Catholic Academy Trust Vision Statement

To be a beacon of Catholic education where every child flourishes, every voice is valued, and every community is uplifted. Guided by faith, compassion, and respect, Lux Mundi Catholic Academy Trust nurtures the whole person, spiritually, academically, and socially, preparing students of all backgrounds to lead lives of purpose, service, and integrity.

2. Mission Statement

Lux Mundi Catholic Academy Trust is a guiding light dedicated to providing Catholic education that embraces and benefits all members of our diverse faith community. Our mission is to create a harmonious environment where everyone can flourish, guided by the principles of inclusivity and community. These values are at the heart of our commitment to delivering high-quality teaching and fostering collaborative learning experiences.

By integrating the core values of Catholic education, faith, respect, and compassion, we ensure that our educational approach is academically enriching and nurturing for the whole person. Our dedication to inclusivity means we welcome students of all faiths and none, creating a community where everyone is valued and supported. This holistic approach prepares our students to be thoughtful, responsible citizens who contribute positively to society.

3. Introduction

The Lux Mundi Trust, Its Directors, and Staff seek to run all aspects of the Trust's business and activities with full regard for high standards of conduct and integrity. If members of the Trust, Directors, local Governors, school staff, parents/carers, or the school community at large become aware of activities which give cause for concern, the Trust 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 "whistleblower" refers to the person raising a concern or making a complaint. It is not meant in a pejorative sense. It 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.

The Trust is committed to combating fraud and other forms of malpractice, treating these issues with the utmost seriousness. The school recognises that some concerns may be extremely sensitive. It has therefore developed a system that allows for the confidential reporting of problems within its school environments, while also providing recourse to an external party outside the management structure of the schools.

The Trust is committed to creating a climate of trust and openness, so that a person with a genuine concern or suspicion can raise the matter with complete confidence that it will be appropriately considered and resolved.

The provisions of this policy apply to matters of suspected fraud and impropriety, and not to issues of more general grievance, which would be addressed under the school's grievance procedures.

4. When might the whistleblowing policy apply?

The type of activity or behaviour which Lux Mundi CAT 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
- Serious breaches of school procedures which may advantage a particular party (for example, tampering with tender documentation or failure to register a personal interest).

5. What action should the whistleblower take?

The Trust encourages the whistleblower to raise the matter internally in the first instance, to allow those school staff and governors in positions of responsibility and authority the opportunity to right the wrong and explain the behaviour or activity.

The Trust has designated several individuals to deal with such matters, and the whistleblower specifically is invited to decide which of those individuals would be the most appropriate person to deal with the matter.

Contact details:

Position	Name	Contact details
Chief Executive Officer	Jane Heffernan	Email: janeheffernan@cardinalpole.co.uk janeheffernan@luxmundi.co.uk Tel: 0207 791 9500 07432 481686
Chief Financial Officer	Mylene Joa-Longartt	Email: mylenejoalongartt@cardinalpole.co.uk mylenejoalongartt@luxmundi.co.uk Tel: 0207 791 9500 0208 985 5150 07960 242513
Chair of Trustees	Justin Madubuko	Email: Via Clerk Tel 0207 985 5150
Chair of Audit and Risk Committee	Simon Bunce	Email: Via Clerk Tel: 0207 985 5150
Clerk – LPC Consultancy Services	Elizabeth Bart - Williams	lizomo@hotmail.com

The whistleblower may prefer to raise the matter in person, by telephone or in written form marked "private and confidential" and addressed to one of the individuals named above. All matters will be treated in strict confidence, and anonymity will be respected wherever possible.

Alternatively, if the whistleblower considers the matter too serious or sensitive to raise within the internal environment of the school, the matter should be directed in the first instance to the following members of the Diocese of Westminster:

> Director of Schools, Archdiocese of Westminster, Vaughan House, 46 Francis Street, London. SW1P 1QN

The Trust would prefer that a serious concern be raised responsibly rather than not at all. Despite the assurances, the whistleblower may feel that it is more appropriate to raise the concern with an external organisation, such as a regulator. It is, of course, open for them to do so, provided they

have sufficient evidence to support the concern. The school strongly advises that before reporting the concern externally, the whistleblower seek advice from one of the following:

Public Concern at Work, a registered charity which advises on serious malpractice within the workplace, can be contacted on 020 7404 6609.

Email: whistle@pcaw.co.uk
Website: www.pcaw.co.uk

The Audit Commission, which is a "prescribed persons" under the Public Interest Disclosure Act, has established an Anti-Fraud and Corruption Unit that can be contacted on 020 7630 1019.

6. 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, such as other members of the school staff, legal or personnel advisors, the Police, and the local authority.

Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer(s), possibly in conjunction with the Trust and the local 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 referral to a third party, such as the police.

The whistleblower will be informed of the investigation's results and the actions taken to address the matter. Depending on the nature of the concern or allegation and whether it has been substantiated, the matter will be reported to the Trust and local authority.

7. Respecting confidentiality

Wherever possible, the confidentiality and anonymity of the whistleblower will be respected, and to the extent possible, the school will protect them from reprisals. The Trust will not tolerate any attempt to victimise the whistleblower or attempts to prevent concerns being raised. It will consider any necessary disciplinary or corrective action appropriate to the circumstances. The Public Interest Disclosure Act became law in 1999 and gives a "worker" the right not to be victimised or dismissed because he or she has made a protected disclosure.

8. Raising unfounded, malicious concerns

Individuals are encouraged to come forward in good faith with genuine concerns, knowing that they will be taken seriously. If individuals raise malicious concerns, or attempt to make mischief, this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances.

9. Conclusion

The Trust's existing good practices in terms of its internal control systems, both financial and non-financial, and the external regulatory environment in which the school operates, ensure that cases of suspected fraud or impropriety are rare. This whistleblowing 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.