WHISTLEBLOWING POLICY AND PROCEDURE

July 2024

Introduction

The School is committed to conducting its business with honesty and integrity and expects all staff to maintain high standards in accordance with their contractual obligations and the School's policies and procedures from time to time in force.

This policy reflects the School's current practices and applies to every individual working for the School irrespective of their status, level or grade. It therefore includes, the Headteacher, Heads of Department, members of the Senior Leadership Team, directors, employees, consultants, contractors, trainees, volunteers, home-workers, part-time or fixed-term employees, casual and agency staff (collectively referred to as "you" and "Staff" in this policy) who are advised to familiarise themselves with its content.

However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

The Aim of this Policy

The aims of this policy are to:

- encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- provide staff with guidance as to how to raise those concerns;
- reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It is provided for guidance to all members of staff at the School and the School reserves the right to amend its content at any time.

What is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected malpractice, wrongdoing or dangers at work. This may include:

- criminal activity;
- child protection and/or safeguarding concerns;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- failure to comply with any legal or professional obligation or regulatory requirements;
- financial fraud or mismanagement;
- negligence;
- breach of our internal policies and procedures including our Code of Conduct;
- conduct likely to damage the School's reputation;
- unauthorised disclosure of confidential information;

- the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern that they believe is in the public interest relating to any of the above. If you have any genuine concern related to suspected wrongdoing or danger affecting any of the School's activities (a whistleblowing concern) you should report it under this policy.

This policy should not be used for complaints relating to your own employment position or personal circumstances at work, such as the way you have been treated at work. In those cases, you should use the School's Grievance Policy and Procedure or Anti-Harassment and Bullying Policy as appropriate.

If you are uncertain whether something is within the scope of this policy you should seek advice from the Headteacher.

Confidentiality

The School hopes that its staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise a concern confidentially, the School will endeavour to keep your identity secret in so far as it is possible to do so when following this policy and procedure. If it is necessary for anyone investigating your concern to know your identity, the School will discuss this with you first. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of a disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered support.

Although a concern may be made anonymously, the School encourages staff to put their name to their allegation whenever possible. Concerns that are expressed completely anonymously are much less powerful and proper investigation may be much more difficult or impossible. It is also much more difficult to establish whether any allegations are credible and to protect your position or to give feedback on the outcome of investigations.

The School will consider anonymous concerns at its discretion, taking into account factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the contacts listed above and appropriate measures can then be taken to preserve confidentiality.

If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are:

Protect	Helpline: **020 3117 2520**
(Independent whistleblowing charity)	*E-mail:* whistle@protect-advice.org.uk *Website: protect-advice.org.uk*

Raising a Whistleblowing Concern

The School hopes that in many cases, you will be able to raise any concerns with your Line Manager and/or Head of Department, speaking to them in person or putting the matter in writing if you prefer. Together, you may be able to agree a way of resolving the concern quickly and effectively.

Where your concern is regarding potential poor or unsafe practice or potential failures in the School's safeguarding regime, you should raise this initially with the Deputy Headteacher.

However, where the matter is more serious, or the Line Manager/Head of Department has not addressed the concern or you would prefer not to raise it with them for any reason, then you should contact one of the following:

- the Headteacher
- Chair of Governors

It would be helpful if you can provide as a minimum the following information:

- the nature of the concern and why you believe it to be true; and
- the background and history of the concern (giving relevant dates where possible).

The School will arrange a meeting with you as soon as possible to discuss your concern. We may ask you for further information about the concern raised in this meeting or at a later stage.

The School will take down a written summary of the concern raised and provide the you with a copy as soon as practicable after the meeting. It will also aim to give you an indication of how it proposes to deal with the matter.

Investigation and Outcome

After the meeting, the School will carry out an initial assessment to determine the scope of any investigation required. The School will inform you of the outcome of this assessment. You may be required to attend additional meetings in order to provide further information of the concerns you have raised.

In some cases, the School may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter (this may include externally appointed persons). The investigator(s) may make recommendations for change to enable the School to minimise the risk of future wrongdoing.

The School will aim to keep you informed of the progress of the investigation and its likely timescale. It will endeavour to complete its investigation within a reasonable timeframe. However, sometimes the need for confidentiality may prevent the School from giving specific details of the investigation or any disciplinary action or other action taken as a result. You are required to treat any information about the investigation as strictly confidential.

If the School concludes that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may (where they are an employee) be subject to disciplinary action under the School's Disciplinary Policy and Procedure.

If you are not Satisfied

Whilst the School cannot always guarantee the outcome you are seeking, the School will try to deal with the concern fairly, professionally and in an appropriate way. If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts outlined above.

External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. The School would expect that in almost all cases, raising the concern internally would be the most appropriate course of action and you should not find it necessary to alert anyone externally.

However, if for whatever reason, you feel you cannot raise your concern internally and you reasonably believe the information and any allegations are substantially true, the law recognises that in some circumstances it may be appropriate for you to report your concern to another prescribed person, such as a regulator or professional body. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone externally. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed people and bodies for reporting certain types of concern (see "Further Information" below).

Where you concern is regarding safeguarding practices within the School, and you feel unable to raise it internally or have concerns about the way your concern is being handled by the School, you can contact the NSPCC whistleblowing advice line on 0800 028 0285 – 8:00 AM to 8:00 PM, Monday to Friday or email: help@nspcc.org.uk. Alternatively, you can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.

Whistleblowing concerns usually relate to the conduct of School Staff, but they may sometimes relate to the actions of a third party, such as a service provider. In some circumstances, the law will protect you if you raise the matter with the third party. However, you are encouraged to report such concerns internally first. You should contact one of the other individuals set out above for guidance.

Protection and Support for Whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. The School is committed to good practice and high standards. It aims to encourage openness and will support Staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other

unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Headteacher immediately. If the matter is not remedied to your satisfaction, you should raise it formally using the School's Grievance Policy and Procedure.

No member of staff must threaten or retaliate against an individual who has raised a concern in any way. The School will not tolerate any such harassment or victimisation and anyone involved in such conduct will be subject to disciplinary action.

However, to ensure the protection of all our staff, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or made in the public interest will also be liable to disciplinary action.

Further Information

Protect (formerly known as Public Concern at Work) is a source of further information and advice at protect-advice.org.uk. Protect provides free, confidential whistleblowing advice, and can be contacted online via its website: protect-advice.org.uk/contact-protect-advice-line or by telephone on 020 3117 2520.

All Staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Headteacher in the first instance.