

7b WHISTLEBLOWING POLICY

*Our mission is to develop happy, confident and successful children
who are well prepared for their future.*

The School has adopted this policy and the accompanying procedure on whistleblowing to enable members of staff to raise concerns internally and in a confidential fashion about any activity within the school that is deemed illegal, immoral, illicit, unsafe or fraudulent.

The policy also provides, if necessary, for such concerns to be raised outside the organisation. It has been written with regard to [KCSIE](#).

WHAT IS WHISTLEBLOWING

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to the activities within the school.

A whistleblower is a person who raises a genuine concern relating to suspected malpractice within the school. If a person has genuine concerns relating to suspected malpractice, affecting any of the school's activities (a whistleblowing concern) they should report it under this procedure.

Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities including the facilitation of tax evasion, corruption, bribery, dishonesty, acting contrary to the staff behaviour or safeguarding policies, criminal activities, or failing to comply with a legal or professional obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment.

ABOUT THIS POLICY

The School is committed to conducting its business with honesty and integrity, and expects all staff to maintain high standards. 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 and to address them when they do occur.

The school's policy on whistleblowing is intended to demonstrate that it:

- will not tolerate malpractice;
- respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff;
- will invoke the school's disciplinary policy and procedure in the case of false, malicious, vexatious or frivolous allegations.

RELATIONSHIP TO OTHER POLICIES AND PROCEDURES

This procedure is separate from the school's adopted procedures regarding grievances. Individuals should not use the whistleblowing procedure to raise grievances about their personal employment situation. If you are uncertain whether something is within the scope of this procedure, you should seek advice from HR, the Head Teacher or Bursar.

MALICIOUS ACCUSATIONS

False, malicious, vexatious or frivolous accusations will be dealt with under the school's disciplinary procedure.

EXTERNAL DISCLOSURES

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases it should not be necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for an individual to report their concerns to an external body such as a regulator. We strongly encourage staff to seek advice before reporting a concern to anyone external.

If staff and volunteers feel unable to raise an issue with the school or feel that their genuine concerns are not being addressed, they may use another whistleblowing channel, such as:

- [Protect](#), an independent whistleblowing charity, previously known as Public Concern at Work (helpline: 020 3117 2520, email: whistle@protect-advice.org.uk)
- The [NSPCC](#) whistleblowing helpline (0808 800 5000, email: help@nspcc.org.uk)

CONFIDENTIALITY

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should discuss this with the Head Teacher or Bursar and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from [Protect](#).

If there is evidence of criminal activity then the Police will, in all cases, be informed.

RAISING A WHISTLEBLOWING CONCERN

Staff are at liberty to raise a whistleblowing concern to the Head Teacher, the Deputy, a member of the EG or the Bursar. If the person expressing the concern feels unable to approach the Head Teacher, the Deputy, a member of the EG or Bursar directly, then the Chair of Governors should be the first point of contact.

A meeting will be arranged with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this procedure. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. You may be required to attend additional meetings in order to provide further information as the concerns raised are investigated.

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. You will be kept informed of progress and, whenever possible and subject to third party rights, will be informed of the resolution. However, sometimes the need for confidentiality may prevent the school from giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If you are not satisfied that your concern is being properly dealt with you will have a right to raise it in confidence with the Governing Body.

EXTERNAL PROCEDURES

Where all internal procedures have been exhausted, a member of staff shall have a right of access to an external person/body. This may include (depending on the subject matter of the disclosure) [HMRC](#), the [Health and Safety Executive](#) and/or the [Local Authority Designated Officer](#) (where the disclosure relates to a child protection issue).

It should be noted that under the [Public Interest Disclosure Act 1998](#), there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the individual reasonably believes:

- that exceptionally serious circumstances justify it;
- that the School would conceal or destroy the relevant evidence;
- they would be victimised by the School;
- the Secretary of State has ordered it.

PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken. However, if it is concluded that a whistleblower has made false allegations maliciously, they may be subject to disciplinary action.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If they believe that they have suffered any such treatment, they should immediately inform the Head Teacher, Bursar, HR or the Chair of Governors (the latter where a complaint is made concerning the former 3).

If the matter is not remedied the whistleblower should raise it formally using the school's grievance procedure.

There must be no threat or retaliation against whistleblowers in any way. Any involvement in such conduct may be subject to disciplinary action and in some cases, the whistleblower may have a right to personally sue an individual for compensation in an employment tribunal.

Version	3
Review Period	Annual or in line with statute or regulation
Independent Schools Inspectorate	Regulation 7b
HR Officer	18.10.22
Headmaster	19.10.22
HR Committee Review and Approval	27.01.23