



## **WHISTLEBLOWING POLICY**

<b>The policy was last reviewed on:</b>	<b>16<sup>th</sup> October 2018</b>
<b>Person/Body reviewing</b>	<b>The Executive Board /Personnel Committees</b>
<b>Date of next review: (except in the case of relevant legislation)</b>	<b>October 2019</b>

Approved: Personnel Committee Meeting 12<sup>th</sup> February 2019

## Whistleblowing policy

### 1 **Honesty and integrity:**

The School is committed to conducting its business with honesty and integrity, and we expect all staff to maintain high standards in accordance with the Code of Conduct. 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.

### 2 **Aims:**

The aims of this policy are to:

- 2.1 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;
- 2.2 provide staff with guidance as to how to raise those concerns; and
- 2.3 reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

### 3 **Staff:**

This policy covers all employees, officers, governors, consultants, contractors, volunteers, work placement students, casual workers and agency workers.

## Wrongdoing at work

### 4 **Whistleblowing:**

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

- 4.1 criminal activity;
- 4.2 safeguarding concerns see paragraph 9 below;

- 4.3 failure to comply with any legal or professional obligation or regulatory requirements;
- 4.4 miscarriages of justice;
- 4.5 danger to health and safety;
- 4.6 damage to the environment;
- 4.7 bribery;
- 4.8 financial fraud or mismanagement;
- 4.9 other unlawful or unethical conduct in the workplace;
- 4.10 the deliberate concealment of any of the above matters.

5 **Whistleblower:**

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.

6 **Grievances:**

This procedure should not be used where you have a complaint relating to your personal circumstances in the workplace. The grievance procedure contained in the Employment Manual should be used in such cases.

7 **Detriment:**

Provided that this procedure is used appropriately and correctly, you will not suffer any detriment as a result of reporting a suspected wrongdoing. A failure to follow this procedure may however make the disclosure unreasonable and the protection given to you by this procedure may be lost.

8 **Advice:**

If you are uncertain whether something is within the scope of this policy you should seek advice from the Principal / Bursar, Designated Safeguarding Lead, Public Concern at Work, the NSPCC whistleblowing helpline or the Modern Slavery helpline.

## 9 **Safeguarding:**

Nothing within this policy is intended to prevent staff from complying with their statutory obligations in accordance with *Keeping Children Safe in Education* (DfE, September 2018). In particular:

- 9.1 **Safeguarding / Child Protection Policy:** If you have any concern about a pupil's welfare, action should be taken immediately. You should report the concern to the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead. See the School's child protection and safeguarding policy and procedures for full information about what to do if you have a concern about a pupil, including what to do if the Designated Safeguarding Lead is not available
- 9.2 **Safeguarding - member of staff:** You should raise any concerns about another staff member with the Head, or if the concern is about the Principal, with the Chair of Governors (without first notifying the Principal) in accordance with the procedures in [Appendix 7 of the School's Child Protection and Safeguarding Policy and Procedures].
- 9.3 **Whistleblowing Policy:** You should follow this procedure to raise concerns about poor or unsafe practices at the School or potential failures by the School or staff to properly fulfil its safeguarding responsibilities.

## 10 **The Modern Slavery helpline:**

The School is committed to the prevention of Modern Slavery. If you have any queries relating to Modern Slavery please contact the Principal or Bursar. Identified instances of modern slavery should be immediately notified to the Police. If you think you have identified an instance of modern slavery, or if you consider that you may be a victim of modern slavery you may contact the Modern Slavery helpline on 0800 0121 700.

## 11 **Exit interviews:**

All staff are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during the course of their employment in accordance with this policy. Safeguarding children is at the centre of the School's culture and

concerns should always be raised in accordance with paragraph 9 above. If issues have not been identified before, safeguarding will always be considered formally during staff performance development reviews and appraisal and finally at exit interviews which are held with all leavers. Staff who raise concerns about working practices at the School to the Designated Safeguarding Lead or an appropriate senior member of Staff will be protected from detriment under this policy.

## Confidentiality

### 12 **Confidentiality:**

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

### 13 **Anonymous disclosures:**

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.

## Stage one

### 14 **Procedure:**

You should disclose the suspected wrongdoing first to your Line Manager. In the event that your Line Manager is involved in the suspected wrongdoing, you shall be entitled to proceed directly to Stage Two of this procedure.

### 15 **Response:**

You can expect a response detailing to whom the disclosure has been notified or any action taken within seven days of your Line Manager or relevant person under Stage Two becoming aware of the disclosure.

## Stage two

### 16 **Procedure:**

If no response is forthcoming after seven days or if your Line Manager is involved in the suspected wrongdoing you shall be entitled to notify the Principal / Bursar as appropriate.

17 **Response:**

You can expect a response detailing any action taken within seven days of the Principal / Bursar becoming aware of the disclosure.

## Stage three

18 **Procedure:**

If no such response is forthcoming after seven School working days, you should inform the Chair of Governors via the Clerk to Governors of the disclosure. Unless your concern is about the Bursar, in which case you should go via the Principal. If your concern is about the Principal, you should inform the Chair of Governors of the disclosure directly. If your concern is reported to another Governor, s/he should then ensure that this is reported to the Chair of Governors.

## Relevant external reporting

19 **Outside body:**

If you do not receive a response within seven days you shall be entitled to notify a relevant and appropriate body outside the School which may include:

- 19.1 the Local Authority Designated Officer;
- 19.2 Children's Social Care;
- 19.3 the NSPCC Whistleblowing Helpline;
- 19.4 the Health and Safety Executive;
- 19.5 the Environment Agency;
- 19.6 the Information Commissioner;
- 19.7 the Department for Education (DfE);
- 19.8 the Department for Business, Energy and Industrial Strategy ;
- 19.9 the Police;

- 19.10 the Charity Commission;
- 19.11 the Boarding Schools Association;
- 19.12 the Independent School's Inspectorate (ISI);
- 19.13 the Channel Police Practitioner.

20 **Advice:**

Staff are strongly encouraged to seek advice before reporting a concern to anyone external. In most cases you should not find it necessary to alert anyone external but before you do, as well as considering the internal help and support available which is identified above, please seek external advice from:

- 20.1 **Public Concern at Work:** If you have any concerns about disclosing a suspected wrongdoing the independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. Staff can call 020 7404 6609 for advice.
- 20.2 **NSPCC:** The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8am-8pm Monday-Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

21 **The Modern Slavery helpline:**

The Modern Slavery helpline is available for staff who do not feel able to raise concerns about modern slavery internally. Staff can call on 0800 0121 700.

22 **The media:**

Even where extreme circumstances are thought to exist, you should under no circumstances approach a commercial body or the media with details of the suspected wrongdoing. If you approach any such body and / or where your concern is disclosed for personal gain, the School may consider this to be gross misconduct and immediate disciplinary action may be taken against you.

23 **Queries:**

If you have any queries about this procedure, you should contact the HR Manager.