



Whistleblowing Policy

Policy Schedule

Written	Autumn 2023
Reviewed by Governing Body	Autumn 2023
Next Review	Autumn 2024

Contents

1.	Introduction	3
2.	Purpose of the policy	3
3.	Who is covered by the policy?	4
4.	Legislation	4
5.	Definition of Whistleblowing	4
6.	Procedure for staff to raise a whistleblowing concern	5
7.	Responding to a whistleblowing concern	5
8.	Malicious or vexatious allegations	6
9.	Escalating concerns beyond the school	6
10.	Safeguarding against harassment or victimisation	6
11.	Approval	7
12.	Links with other policies	7

1. Introduction

Grayswood CE Primary School is committed to the highest possible standards of honesty, openness, probity and accountability. It seeks to conduct its affairs in a responsible manner, to ensure that all its activities are open and effectively managed, and that the integrity and principles of public interest disclosure are sustained.

In line with that commitment, we encourage employees, those working on behalf of the School and others that we deal with, who have serious concerns about any aspect of the School's work to come forward and voice those concerns as follows:

- a) with their immediate manager and/or more senior managers. Where any member of staff decides to report a serious incident, whether anonymous or not, this will be treated as a 'protected, internal disclosure' i.e., there will be no adverse repercussions for the member of staff.
- b) use an external, independent and confidential service provided by Novex Global, who can be contacted on their freephone helpline number 0800 069 8180 and the website link is as follows:
<https://secure.ethicspoint.eu/domain/media/en/gui/107090/index.html>

2. Purpose of the policy

Employees are often the first to realise that there may be something seriously wrong within the School. However, staff may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the School. They may also fear harassment or victimisation. Each person working for Grayswood CE Primary School needs to realise that they not only have the right, but also a duty to report any improper actions or omissions.

Grayswood CE Primary School also recognises and appreciates that employees who raise concerns regarding malpractice or wrongdoing are an asset to the School, and not a threat. This policy makes it clear that they can raise concerns without fear of victimisation, subsequent discrimination or disadvantage. The whistle blowing policy is intended to encourage and enable employees to raise serious concerns within the School.

This policy aims to:

- encourage staff to feel confident in raising serious concerns and to question and act upon concerns about practice in the knowledge that their concerns will be taken seriously and investigated, and that their confidentiality will be respected
- Let all staff in the school know how to raise concerns about potential wrongdoing in or by the school
- set clear procedures for how the school will respond to such concerns
- ensure that staff receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied
- assure staff that they will not be victimised for raising a legitimate concern through the steps set out in the policy, even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue)

3. Who is covered by the policy?

The policy applies to all School employees whether full-time or part time, permanent or temporary; members of the school staff and those carrying out work for the School on School premises, for example, agency workers, contractors, consultants. It also covers providers of works, services and supplies, including the School's external contractors and those providing services under a contract with the School in their own premises. However, to facilitate the reading of this policy, the terms 'staff' or 'members of staff' have been used, with the intention to cover all individuals mentioned above.

This policy will be expected to apply to Schools, but this is a decision for the Headteacher/ Chair of Governors. Arrangements for whistle blowing will be covered by individual School's procedures to reflect their respective governance arrangements.

4. Legislation

This policy has been written in line with the above document, as well as [government guidance on whistle-blowing](#). We also take into account the [Public Interest Disclosure Act 1998](#).

5. Definition of Whistleblowing

There are existing procedures in place to enable employees to lodge a grievance relating to their own employment. The whistle blowing policy is intended to cover serious concerns that fall outside the scope of other procedures, in accordance with the Public Interest Disclosure Act 1998.

Whistle-blowing covers concerns made that report wrongdoing that is "in the public interest". Examples of whistle-blowing include (but are not limited to):

- Criminal offences, such as fraud or corruption
- Pupils' or staff health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment

A whistle-blower is a person who raises a genuine concern relating to the above.

Not all concerns about the school count as whistle-blowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistle-blowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance.

When staff have a concern, they should consider whether it would be better to follow our staff grievance or complaints procedures.

Protect (formerly Public Concern at Work) has:

- [Further guidance](#) on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure
- A free and confidential [advice line](#)

6. Procedure for staff to raise a whistleblowing concern

6.1 When to raise a concern

Staff should consider the examples in section 3 when deciding whether their concern is of a whistleblowing nature. Consider whether the incident(s) was illegal, breached statutory or school procedures, put people in danger or was an attempt to cover any such activity up.

6.2 Who to report to

Staff should report their concern to the [headteacher or another senior member of staff]. If the concern is about the headteacher, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the chair of governors.

6.3 How to raise a concern

Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter.

7. Responding to a whistleblowing concern

7.1 Investigating the concern

When a concern is received by the headteacher– referred to from here as the ‘recipient’ – they will:

- Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative
- Get as much detail as possible about the concern at this meeting, and record the information. If it becomes apparent the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure
- Reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken
- Establish whether there is sufficient cause for concern to warrant further investigation. If there is:
 - The recipient should then arrange a further investigation into the matter, involving the headteacher, if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In other cases, they may need to report the matter to the police
 - The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps

7.2 Outcome of the investigation

Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified, and whether or not a referral is required to an external organisation, such as the local authority or police.

They will inform the person who raised the concern of the outcome of the investigation, though certain

details may need to be restricted due to confidentiality.

Beyond the immediate actions, the headteacher and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

8. Malicious or vexatious allegations

Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern.

If, however, an allegation is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the person making the allegation.

9. Escalating concerns beyond the school

The school encourages staff to raise their concerns internally, in line with section 5 of this policy, but recognises that staff may feel the need to report concerns to an external body. A list of prescribed bodies to whom staff can raise concerns with is included here.

The Protect advice line, linked to in section 6 of this policy, can also help staff when deciding whether to raise the concern to an external party.

10. Safeguarding against harassment or victimisation

Grayswood CE Primary School is committed to good practice and high standards and wants to be supportive of employees. It is recognised that the decision to report a concern can be a difficult one to make. If a member of staff has a reasonable belief that what they are saying is true, they have nothing to fear because they will be doing their duty to their employer and/or those for whom they are providing a service.

The School will take a zero tolerance approach to any act of harassment or victimisation (including informal pressures. The School will take appropriate action to protect staff when they raise a concern, by supporting the member of staff and consider action under the appropriate procedure (for example Disciplinary) against the person or persons responsible for the reported acts, provided the member of staff:

- Discloses the information in good faith
- Believes the concern to be true
- Does not act maliciously or make false allegations
- Does not seek any personal gain, and
- Provided the allegations relate to one of the categories covered by the scope of the policy and referred to above.

There are national guidelines to help you as a whistle blower. You can find out more on the protection of whistle blowers from the [Information Commissioner's Office \(ICO\)](#).

11. Approval

This policy will be reviewed every 2 years.

These procedures have been agreed by the governing body who will approve them whenever reviewed.

12. Links with other policies

- Staff grievance policy
- Complaints procedure
- Child protection policy

In investigating financial irregularities, this policy should be read in conjunction with the [‘Strategy against Fraud & Corruption’](#) which sets out how the financial irregularities should be investigated.

This policy does not replace the corporate complaints procedures. The flowchart and other information available on the Service for Schools Portal <https://secure2.sla-online.co.uk/v3/Resources/Page/14831> shows the relationship between the Whistle blowing policy and separate School procedures such as Grievance and Disciplinary.

As this policy is in addition to the School’s complaints procedures, and other statutory reporting procedures applying to some services, managers are responsible for making service users aware of the existence of these procedures.

Additional Contact Details:

Designated Safeguarding Lead

The School’s DSL is: The Headteacher, Hannah Cole

The School’s Deputy DSLs are: Richard Stanton, Amanda Harling and Sophie Ireland
dsl@grayswood.surrey.sch.uk 01428 642086

Chair of Governors

Fiona Tough - tough@grayswood.surrey.sch.uk

Local Authority Designated Officer (LADO)

Please contact: 0300 200 1006