

# WHISTLEBLOWING POLICY

## 1. INTRODUCTION

- 1.1 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 fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations, inappropriate behaviour or unethical conduct. The policy also provides if necessary, for such concerns to be raised outside the organisation.
- 1.2 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.

## 2. OBJECTIVES

- 2.1 To ensure staff feel confident to raise necessary concerns.
- 2.2 To demonstrate that the school will not tolerate malpractice.
- 2.3 To respect the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively.
- 2.4 To provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate.
- 2.5 To invoke the School's disciplinary policy and procedure in the case of false, malicious, vexatious or frivolous allegations.
- 2.6 To provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

## 3. SUCCESS CRITERIA

- 3.1 That staff feel confident to report any concerns.

## 4. METHODOLOGY

- 4.1 **Implementation** - This procedure is separate from the School's adopted procedures regarding grievances.
  - 4.1.1 Employees should not use the whistleblowing policy to raise grievances about their personal employment situation. **If you are uncertain whether something is within the scope of this policy you should seek advice from the Headmistress, the Bursar, or the Human Resources Manager.**
  - 4.1.2 This policy is to enable members of staff to express a legitimate concern regarding suspected malpractice within the School.
  - 4.1.3 Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of ethics, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment.

## 4.2 Confidentiality

- 4.2.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you wish to raise a concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating the concern to know your identity, this will be discussed with you.
- 4.2.2 If there is evidence of criminal activity then the Police will in all cases be informed.
- 4.2.3 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 or Bursar 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 set out below.

## 4.3 The Investigation

- 4.3.1 A member of staff will be at liberty to express their concern to the Headmistress, one of the Deputy Heads or Bursar. A member of staff who is not satisfied that their concern is being properly dealt with or feels unable to approach these members of staff have a right to raise it in confidence with the Governors.
- 4.3.2 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.
- 4.3.3 Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The member of staff making the allegation 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 us 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.

## 4.4 External Procedures

- 4.4.1 Where all internal procedures have been exhausted, a member of staff shall have a right of access to the Girls' School Association, the Association of Independent Prep Schools, the Independent Schools' Council, Independent Schools Bursars Association, HMRC, Audit Commission, Health & Safety Executive or LADO as appropriate.
- 4.4.2 Protect, an independent whistleblowing charity, previously known as Public Concern at Work (helpline: 020 3117 2520, email: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk), website: [Protect Advice](https://www.protect-advice.org.uk)).
- 4.4.3 The NSPCC whistleblowing helpline which is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285; the line is available from 8:00 AM to 8:00 PM, Monday to Friday, or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

4.4.4 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 employee reasonably believes:

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

4.5 **Malicious Accusations** - False, malicious, vexatious or frivolous accusations will be dealt with under the School's Disciplinary Procedure.

4.6 **Protection from Reprisal or Victimisation** - No member of the staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and following the Whistleblower procedures.

4.7 **Monitoring** - The Bursar will monitor the implementation of this policy in discussion with the Designated Safeguarding Lead.

## 5. EVALUATION

5.1 The Bursar will review the effectiveness of the policy.

## 6. REVIEW

6.1 This policy will be reviewed by the Bursar every three years.

Reviewed by Deputy Head (Pastoral): September 2025

Approved by Education & Welfare Committee: October 2024

Reviewed by Bursar: September 2024

Reviewed by Bursar: 2020