



# Sheen Mount Primary School WHISTLEBLOWING POLICY

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## 1 INTRODUCTION

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This school is committed to achieving the highest possible standards of service, including honesty, openness, and accountability. We expect our staff, volunteers and other workers to maintain these standards in accordance with the school’s Code of Conduct, the London Borough of Richmond Whistleblowing Code and other policies and procedures. The school recognises that employees have an important role to play in achieving these goals. Any employee, worker, volunteer, contractor or other person in regular contact with the school may have concerns about things they observe in the school. This Policy enables employees to ‘whistleblow’ about a matter that is in the public interest. This policy is not about individual concerns about your employment. Such concerns should be raised with your line manager or Headteacher. Similarly, workers, volunteers or other non-employees should raise general concerns through the school’s complaints procedure. The type of concerns that may be raised under this procedure include, but are not limited to:

- Risks to health and safety
- Child protection issues
- Potentially illegal conduct
- Unauthorised use of public funds
- Financial malpractice, fraud or corruption
- Abuse of clients, including improper relationships
- Miscarriages of justice
- Action contrary to the school's code of conduct
- Damage to the environment
- Unauthorised disclosure of confidential information
- Concealment of any concerns of public interest, including the above

## **2 SCOPE OF THIS POLICY**

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This policy covers all permanent and temporary employees, and volunteers of the school.

## **3 DATA PROTECTION**

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When an individual makes a disclosure, the organisation will process any personal data collected in accordance with its data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

## **4 YOUR PROTECTION**

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If you raise a genuine concern in accordance with this policy, you will not be at risk of receiving less favourable treatment, or losing your job. As long as you are acting honestly and in good faith, it does not matter if you are mistaken or if there is an innocent explanation for your concerns. You will not be asked to provide proof.

Should a concern be raised maliciously, or in the knowledge that the information is untrue, then disciplinary action may be taken.

The school will not tolerate victimisation or bullying of anyone raising a genuine concern. You can request that your identity is kept confidential, the school will consider this carefully, it may be necessary to use your name internally during an investigation process. If it becomes necessary to disclose your name in order to resolve the concern, we will discuss this with you and how we can proceed.

If you do not tell us who you are, i.e. raising an anonymous concern, it will be much more difficult for the matter to be investigated, for you to be protected and to give feedback. In addition, it is likely that there will be insufficient information to be able to proceed to an investigation.

## 5 HOW TO RAISE A CONCERN

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You are encouraged to raise your concern internally in the first instance. This would normally be raised with your line manager. If the concern you are raising involves your line manager, then you should raise the matter with your Headteacher.

Should you have a concern that is about the Headteacher, or a member of the governing body this should be raised with the designated governor (if your concern includes the designated governor then your concern should be raised with the chair of governors).

You can raise your concern verbally in a confidential meeting with the manager (as above), or in writing to the manager.

You should provide as much supporting evidence as possible and preferably raise the concern as soon as you become aware of it. You should also ensure that you make it clear that the concern you are raising is under the whistle blowing policy.

If you need support or advice you can seek support from a Union representative or a work colleague, or talk to your line manager, prior to raising a formal concern.

## 6 DEALING WITH A DISCLOSURE

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Once a disclosure has been made it is good practice to hold a meeting with the whistleblower to gather all the information needed to understand the situation. In some cases a suitable conclusion may be reached through an initial conversation with a manager.

In more serious cases there may be a need for a formal investigation. The school will need to decide what the most appropriate action to take is. It is important to note that if an investigation concludes that the disclosure was untrue it does not automatically mean that it was raised maliciously by the employee. When dealing with disclosures, it is good practice for managers to:

- Meet the individual in a confidential place;
- Treat all disclosures made seriously and consistently;
- Provide support to the worker during what can be a difficult or anxious time with access to advice and counselling (where appropriate);
- Reassure the whistleblower that their disclosure will not affect their position at work;
- Document whether the whistleblower has requested confidentiality;
- Manage the expectations of the whistleblower in terms of what action and/or feedback they can expect as well clear timescales for providing updates;
- Produce a summary of the meeting for record keeping purposes and provide a copy to the whistleblower;
- Allow the worker to be accompanied if they wish by a trade union representative or work colleague at any meeting about the disclosure;

- Provide support services after a disclosure has been made such as mediation and dispute resolution, to help rebuild trust and relationships in the workplace.

It will be useful to document any decisions or action taken following the making of a disclosure by a worker. It is also good practice for schools to:

- Record the number of whistleblowing disclosures they receive and their nature.
- Maintain records of the date and content of feedback provided to whistleblowers.

## **7 WHAT WILL HAPPEN NEXT?**

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The manager who receives your concern will either carry out an initial investigation themselves, or refer the matter to a more senior manager who will arrange an investigation. Initially this will be an internal investigation to establish the details of the matter and to assess the seriousness of it. This is likely to involve others who may be asked to give a written statement.

The Headteacher/line manager will write to the whistleblower within 10 working days to confirm the concerns that they raised and inform them who is handling the matter and how the whistleblower can contact that person. It may be necessary for the whistleblower to attend an investigation meeting to give further information, or to give a written statement, in which case they will be informed of the details. The identity of the whistleblower will not be disclosed in any of the documents prepared as part of the investigation without their written consent, except for the following situations:

- there is a legal obligation to do so,
- in confidence to a legal advisor,
- the information is already in the public domain,
- there are grounds to believe you have acted maliciously.

The next step will be to decide if it is necessary to involve any outside agencies, such as:

- An external auditor
- An independent investigator
- An authority specific to the nature of the concern (e.g. child protection)
- The Police

If it is not necessary to involve an outside agency, the investigating officer will recommend a course of action which could include action under one of the school's policies for example the Disciplinary procedure. It may be that the conclusion is that no action is necessary.

The Headteacher/line manager will keep the whistleblower informed of the progress of the matter and, where possible inform them of the final outcome. It may not be possible to share the details of the final outcome if they include actions which are confidential to an individual, for example disciplinary proceedings. If the outcome is that there is no action to take the reasons for this will be explained to the whistleblower.

Any information shared with the whistleblower will be strictly confidential.

## 8 FURTHER ADVICE AND SUPPORT

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Further advice and support can be obtained from the Union, from an independent solicitor, or from the independent whistleblowing charity Public Concern at Work, who offer a confidential helpline. Their contact details are:

Public Concern at Work:

Helpline: 020 3117 2520

email: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)

Website: <https://protect-advice.org.uk/contact-protect-advice-line>

## 9 IN SUMMARY

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DO:

- Make an immediate note of concerns which fall within the scope of this policy
- Note all relevant details, such as what was said, the date, time and names of people involved
- Let someone know your suspicions (See point 4, how to raise a concern)
- Deal with the matter quickly, any delay may allow the problem to continue or worsen

DON'T:

- Do nothing
- Be afraid of raising concerns
- Approach or accuse individuals directly
- Try to investigate the matter yourself