

WHISTLE-BLOWING POLICY

The School is committed to the highest standards of openness, honesty and accountability, and the Governing Body encourages staff to raise any concern they may have in relation to malpractice or wrongdoing, so that the matter can be thoroughly investigated internally. Staff and others with genuine concerns have the right under the Public Interest Disclosure Act 1998 to raise those concerns, and to be assured that they will be protected from victimisation, harassment or retribution of any kind.

The Headmistress has overall responsibility for ensuring that the *Whistle-Blowing Policy* is managed in accordance with the agreed procedure and that a confidential record is maintained by the Headmistress of concerns raised and their outcomes. The Headmistress is responsible for making all staff aware of the existence of these procedures, and staff are responsible for familiarising themselves with the policy and complying with it. The Headmistress will report to the Governing Body any concerns raised under this procedure.

The School recognises that the decision to report a concern can be a difficult one to make. If you raise a concern that you reasonably believe to be true, you will be doing your duty to the School and pupils of the School and you will have nothing to fear. The School will not tolerate any harassment or victimisation (including informal pressure) from any member of staff and will take appropriate steps, including disciplinary action, to protect employees when concerns are raised.

Anyone who is found to have maliciously raised a whistle-blowing concern will face disciplinary proceedings that may result in dismissal.

Existing complaints procedures and grievance procedures are in place which make provision for employees to raise a concern in relation to their own employment. This *Whistle-Blowing Policy* applies to serious concerns which are in the public interest and provides a mechanism for such concerns to be raised without fear of reprisal. Such concerns might include one of the following:

- an allegation of unlawful behaviour (including financial malpractice)
- a serious health and safety risk, including risks to the public as well as employees and pupils
- serious damage to the environment
- serious neglect of duty
- corruption
- unethical behaviour

Any allegation falling within the scope of the School's *Safeguarding Policy* should be reported to the School's principal Designated Safeguarding Lead, to the deputy Designated Safeguarding Lead or to the Headmistress. For independent advice, please note the NSPCC Whistleblowing Advice Line (www.nspcc.org.uk; telephone: 0800 028 0285; email: help@nspcc.org.uk). Postal address: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.

Raising a Concern

If you have a whistle-blowing concern you are encouraged to raise it as soon as you have a reasonable suspicion so that the matter can be investigated as soon as possible. You should not investigate the matter yourself.

Any concern you may have should in the first instance be raised verbally with your immediate manager. If you do not feel confident, for whatever reason, about raising the concern with your manager, or if

you do not feel that your manager has properly addressed your concern, you should raise it with the Deputy Head, the Bursar or the Headmistress. If you would prefer not to talk through your concern either face-to-face or on the telephone, you may write instead to either your manager or the Headmistress.

You may prefer to raise a concern anonymously in the first instance, and should this be the case, the person receiving your concern will respect your wish not to be identified. You are encouraged to put your name to an allegation wherever possible because concerns expressed anonymously are much more difficult to investigate. Therefore, anonymous allegations will be considered at the discretion of the Headmistress. In exercising this discretion the factors to be taken into account would include:

- the seriousness of the issue raised
- the credibility of the concern
- the likelihood of confirming the allegation from attributable sources

All concerns will be treated in confidence, and every effort will be made to respect confidentiality regarding any concern raised under this policy. At the appropriate time however, you may need to come forward as a witness.

If, for whatever reason, you are unable to raise the concern with the Deputy Head, the Bursar or the Headmistress, or you do not feel that your concern has been properly addressed, you may contact the Chair of Governors who will appoint a panel of governors to investigate the concern. Similarly, if your concern relates directly to the Headmistress you should contact the Chair of Governors.

How the School will Respond

The School will acknowledge your concern and carry out an investigation if initial enquiries made to protect those accused of misdeeds or possible malpractice confirm that an investigation is appropriate. The investigation will be carried out by senior management, through the disciplinary process where necessary. The matter may be referred to the Police or the internal auditor or it may form the subject of an independent enquiry.

You may invite a trade union or professional association representative or friend to be present during any meetings or interviews in connection with the concerns raised.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.

Within ten days of a concern being raised, the Headmistress will write to you to acknowledge that the concern has been raised and indicating how the School proposes to deal with the matter. The letter will also inform you about whether any initial enquiries have been made and may, if possible, give an estimate of how long it will take to provide a final response. You will be told whether further investigations will take place, and if not, why not. You will also be advised of appropriate sources of support and advice.

The School will provide you with as much information as it can on the outcome of your concern, but due to the legal obligations of confidentiality that it owes to other employees, it might not be possible freely to provide feedback on the outcome of any disciplinary action taken against another employee.

If you become aware of continued wrongdoing or become anxious about perceived or actual reprisal, you should report the matter immediately to a member of SLT.

