

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, failure to comply with legal obligations, inappropriate behaviour or unethical conduct. The policy also provides for such concerns to be raised outside of the School if necessary.

# About this Policy

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.

The School's policy on whistleblowing is intended to demonstrate that it:

- will not tolerate malpractice;
- respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- will invoke the School's disciplinary procedure in the case of false, malicious, vexatious or frivolous allegations; and
- will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

## What is Whistleblowing?

A "whistleblower" is a person who raises a genuine concern relating to suspected malpractice within the School. If you have any genuine concerns related to suspected malpractice affecting any of the School's activities (i.e. a whistleblowing concern) you should report it under this procedure.

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.

This procedure is separate from the School's adopted procedures regarding grievances. It is in place to enable members of staff to express a legitimate concern regarding suspected malpractice within the School. Individuals should not use the whistleblowing procedure to raise grievances about their personal employment situation. If you are uncertain whether something is within the scope of this procedure you should seek advice from the Headmaster, in the first instance.

### Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this procedure. 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.

If there is evidence of criminal activity, the Police will be informed.

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 Headmaster and appropriate measures can then be taken to preserve confidentiality.

#### **Procedure for Raising a Whistleblowing Concern**

You should raise a whistleblowing concern with the Headmaster or the Deputy Headmaster. A meeting will be arranged with you as soon as possible to discuss your concern. You may bring a colleague 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.

During any meetings we will take down a written summary of your concern.

Any concern raised will be investigated thoroughly, in a timely manner and appropriate corrective action will be pursued. You will be kept informed of the progress of the investigation and the resolution where possible and subject to third party rights. 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 you receive about the investigation as confidential.

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help

us to achieve this. If, however, you are not satisfied that your concern is being dealt with / has been dealt with appropriately, you can raise your concerns in confidence with the Chair of Governors, or where your concerns relate directly about the Headmaster.

### External Procedures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. We hope that, in most cases you should not find it necessary to alert anyone externally.

It should be noted that under the Public Interest Disclosure Act 1998, UK, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the individual 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

### Malicious Accusations

Staff should be aware that false, malicious, vexatious or frivolous accusations will be dealt with under the School's Disciplinary Procedure.

## Protection from Reprisal or Victimisation

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Staff should rest assured that no individual will suffer a detriment or be disciplined for raising a genuine and legitimate concern, provided that they do so in good faith and following the Whistleblowing procedure set out above.

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