



Saint Felix School

SOUTHWOLD

Whistleblowing Policy

(Extracted from the Inspired Learning Group Employment Manual)

School Proprietor	Mr A Mehta
Date	07/03/2024
Review Date	Spring Term 2025
Review Period	Annually
Custodian	Inspired Learning Group Head Office

Whistleblowing Policy – Extracted from ILG Employment Manual

- 1 **Honesty and integrity:** Inspired Learning Group is committed to conducting its business with honesty and integrity, and we expect all staff to maintain high standards in accordance with the Code of Conduct. 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 **Aims:** The aims of this policy are to:
 - 2.1 encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
 - 2.2 provide staff with guidance as to how to raise those concerns; and
 - 2.3 reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 3 **Staff:** This policy covers all employees, officers, Proprietors, consultants, contractors, volunteers, work placement students, casual workers and agency workers.

Wrongdoing at work

- 4 **Whistleblowing:** Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:
 - 4.1 criminal activity;
 - 4.2 safeguarding concerns (see paragraph 9 below);
 - 4.3 failure to comply with any legal or professional obligation or regulatory requirements;
 - 4.4 miscarriages of justice;
 - 4.5 danger to health and safety;
 - 4.6 damage to the environment;
 - 4.7 bribery;
 - 4.8 financial fraud or mismanagement;
 - 4.9 other unlawful or unethical conduct in the workplace;
 - 4.10 the deliberate concealment of any of the above matters.
- 5 **Whistleblower:** A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities and such disclosure is in the public interest (a **whistleblowing concern**) you should report it under this policy.
- 6 **Grievances:** This procedure should not be used where you have a complaint relating to your personal circumstances in the workplace. The grievance procedure contained in the Employment Manual should be used in such cases.
- 7 **Detriment:** Provided that this procedure is used appropriately and correctly, you will not suffer any detriment as a result of reporting a suspected wrongdoing.

- 8 **Advice:** If you are uncertain whether something is within the scope of this policy you should seek advice from the [• Head], Designated Safeguarding Lead, Protect, the NSPCC whistleblowing helpline or the Modern Slavery helpline.

Safeguarding

- 9 **Safeguarding:** Nothing within this policy is intended to prevent staff from complying with their statutory obligations in accordance with *Keeping Children Safe in Education* (DfE, September 2018). In particular:
- 9.1 **Safeguarding / child protection policy:** If you have any concern about a pupil's welfare, action should be taken immediately. You should report the concern to the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead. See your setting's child protection and safeguarding policy and procedures for full information about what to do if you have a concern about a pupil, including what to do if the Designated Safeguarding Lead is not available.
- 9.2 **Safeguarding - member of staff:** You should raise any concerns about another staff member with the Head, or if the concern is about the Head, with the Proprietors (without first notifying the Head) in accordance with the procedures in [• Appendix 4 of your setting's child protection and safeguarding policy and procedures].
- 9.3 **Whistleblowing policy:** You should follow this procedure to raise concerns about poor or unsafe practices at your setting or potential failures by your setting or staff to properly fulfil its safeguarding responsibilities.
- 10 **The Modern Slavery helpline:** Inspired Learning Group is committed to the prevention of Modern Slavery. If you have any queries relating to Modern Slavery, please contact the Head. Identified instances of modern slavery should be immediately notified to the police. If you think you have identified an instance of modern slavery, or if you consider that you may be a victim of modern slavery you may contact the Modern Slavery helpline on 0800 0121 700.
- 11 **Exit interviews:** All staff are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during the course of their employment in accordance with this policy. Safeguarding children is at the centre of Inspired Learning Group's culture and concerns should always be raised in accordance with paragraph 9 above. If issues have not been identified before, safeguarding will always be considered formally during staff performance development reviews and appraisal and finally at exit interviews which are held with all leavers. Staff who raise concerns about working practices at Inspired Learning Group to the Designated Safeguarding Lead or an appropriate senior member of Staff will be protected from detriment under this policy.

Confidentiality

- 12 **Confidentiality:** We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

- 13 **Anonymous disclosures:** 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.

Stage one

- 14 **Procedure:** You should disclose in writing by filling out the whistleblowing form provided at page 126 of the employment manual the suspected wrongdoing first to your Deputy Head/ Line Manager. In the event that your Deputy Head / Line Manager is involved in the suspected wrongdoing, you should proceed directly to Stage Two of this procedure.
- 15 **Response:** You can expect a response detailing to whom the disclosure has been notified or any action taken within seven days of your Deputy Head / Line Manager becoming aware of the disclosure.

Stage two

- 16 **Procedure:** If no response is forthcoming after seven days from your Deputy Head/ Line Manager, if you are not satisfied with the way in which your concern has been handled or if your Deputy Head / Line Manager is involved in the suspected wrongdoing you should notify the Head, as appropriate.
- 17 **Response:** You can expect a response detailing any action taken within seven days of the Head becoming aware of the disclosure.

Stage three

- 18 **Procedure:** If no such response is forthcoming after seven days from the Head, if you are not satisfied with the way in which your concern has been handled or if the Head is involved in the suspected wrongdoing you should inform the Proprietors of the disclosure.

Relevant external reporting

- 19 **Outside body:** The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. The law recognises, as does paragraph 9 above, that in some circumstances it may be appropriate for you to report your concerns to a relevant outside body including:
- 19.1 the local authority's Designated Officer;
 - 19.2 Children's Social Care;
 - 19.3 the NSPCC;
 - 19.4 the Health and Safety Executive;
 - 19.5 the Environment Agency;
 - 19.6 the Information Commissioner;
 - 19.7 the Department for Education;
 - 19.8 the Department for Business, Energy and Industrial Strategy;
 - 19.9 the police;
 - 19.10 the Independent Schools Inspectorate;
 - 19.11 the Office for Standards in Education, Children's Services and Skills (**Ofsted**); or
 - 19.12 the Channel Police Practitioner.

- 20 **Advice:** Staff are strongly encouraged to seek advice before reporting a concern to anyone external. In most cases you should not find it necessary to alert anyone external but before you do, as well as considering the internal help and support available which is identified above, please seek external advice from:
- 20.1 **Protect:** If you have any concerns about disclosing a suspected wrongdoing the independent whistleblowing charity, Protect, operates a confidential helpline. Staff can call 020 7404 6609 for advice.
- 20.2 **NSPCC:** The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8.00 am to 8.00 pm Monday to Friday) or email help@nspcc.org.uk.
- 20.3 **The Modern Slavery helpline:** The Modern Slavery helpline is available for staff who do not feel able to raise concerns about modern slavery internally. Staff can call on 0800 0121 700.
- 21 **The media/ malicious allegations:** You should under no circumstances approach a commercial body or the media with details of the suspected wrongdoing. If you approach any such body and / or where your concern is disclosed in a malicious manner or Inspired Learning Group's whistleblowing procedure is not followed or for personal gain, the protection given to you by this procedure may be lost. Additionally, Inspired Learning Group may consider this to be gross misconduct and disciplinary action may be taken against you.
- 22 **Queries:** If you have any queries about this procedure, you should contact the Head.

Whistleblowing Disclosure Form

This form is intended for use by any individual working for the Organisation (including contractors, agency workers and volunteers) who wishes to raise an issue about wrongdoing.

This form should be used to report wrongdoing within the Organisation (for example, financial irregularities or health and safety concerns), rather than to raise a personal grievance (for example, if you would like to make an allegation of bullying or harassment or are complaining that your contract of employment has been breached).

If you are unsure about whether your concerns are best dealt with under the Organisation's whistleblowing policy or grievance procedure, please read the Organisation's whistleblowing policy, which provides examples of the issues that should be reported using this form. If, having read the whistleblowing policy, you remain unsure about which procedure to use, please consult the Head of HR for further advice.

Once you have submitted this form, the Organisation's whistleblowing procedure will be invoked. This will result in an investigation, which will not involve anyone (for example, your line manager) you may have implicated below.

In certain circumstances, you can request that your concerns be kept anonymous. Where possible, the Organisation will respect a request for anonymity, but cannot guarantee that it will be able to do so.

This form should be completed and delivered to [St Felix HR] in an envelope marked "confidential" or sent as an email attachment with "confidential" in the subject line.

Formal public interest disclosure (whistleblowing)

Employee's name:

Employee's job title:

Employee's department:

Date:

Does your public interest disclosure relate to your line manager?

Yes/No

Summary of disclosure:

Please set out the details of the issue that you wish to raise, providing examples where possible, particularly dates, times, locations and the identities of those involved. You may attach additional sheets if required.

Individuals involved:

Please provide the names and contact details of any people involved in your concerns, including witnesses.

Outcome requested:

Please set out how you would like to see the issue dealt with, and why and how you believe that this will resolve the issue.

Declaration:

I confirm that the above statements are true to the best of my knowledge, information and belief. I understand that, if I knowingly make false allegations, this may result in the Organisation taking disciplinary action against me.

Form completed by:**Signature:****For completion by the Organisation:**

Date form received by the Organisation:

Name of recipient and job role:

Signature: