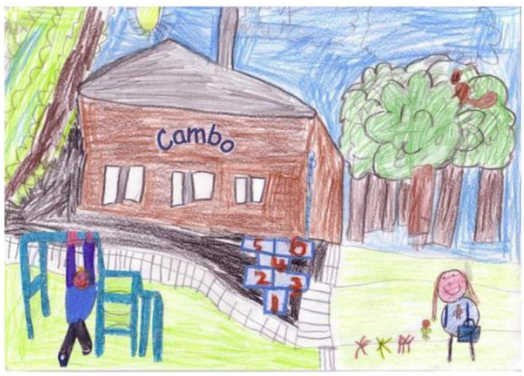


Cambo First School

Whistleblowing

POLICY FRAMEWORK

Date of Adoption by the Governing Body:	Spring 2025

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Introduction

101 We are committed to maintaining a culture of openness, accountability and integrity, seeking to ensure that employees and workers feel secure in disclosing concerns about any activity which may harm individuals or undermine our school. We have therefore adopted this Whistleblowing Policy to provide clear guidance to those who may need to raise concerns in accordance with the Public Interest Disclosure Act 1998 (PIDA) and DfE guidance for schools.

102 We recognise that our staff may be in the best position to realise that something could be seriously wrong within our school. However, in some cases they may not express their concerns because they feel that speaking up would be disloyal. They may also fear harassment or victimisation.

103 We therefore feel it is crucial that we, as the Governing Body, promote a culture that expects the highest possible standards of openness, integrity, and accountability. In line with that commitment, we openly encourage staff within the scope of this policy, who have serious concerns about any aspect of the school's work, to come forward and disclose those concerns.

104 We recognise that they may wish to seek advice and be supported by a trade union representative when raising a concern and we would acknowledge and encourage such actions, recognising the important role trade union representatives can play. Trade union representatives acting in accordance with this policy and procedure will not suffer detriment in their employment with our school.

Purpose and Aims

201 The purpose of this policy is to encourage staff to report (and importantly how to report) suspected wrongdoing within school, with the knowledge that their concerns will be taken seriously and investigated as appropriate, and their confidentiality will be protected wherever possible.

202 This policy therefore aims to:

- encourage staff to feel confident in raising serious concerns and to question and act upon these concerns.
- provide avenues for staff to raise those concerns and receive feedback on any action taken; where appropriate and relevant.
- ensure that staff receive a response to their concerns and are aware of how to pursue them if they are not satisfied.
- reassure staff that they will be protected from possible reprisals or victimisation if they have a reasonable belief that they have made a disclosure in the public interest.

Scope

301 This Policy and Procedure will apply to all staff working in school and is intended to cover those concerns that fall outside the normal scope of other school policies and procedures, dealing with serious wrongdoing or malpractice. A disclosure protected under this policy may include (please note that this is not an exhaustive list): -

- a criminal offence and/or activities
- bribery, corruption, or blackmail
- financial malpractice or irregularity
- improper use of authority
- failure to comply with any legal obligations or regulatory requirements.
- miscarriage of justice
- there is a threat to an individual's health and safety.
- damage to the environment
- covering up wrongdoing in respect of any of the above
- Any act of harassment, sexual harassment or victimisation

- conduct likely to damage the school's reputation.
- breaches to the schools' internal policies and procedures
- deliberate concealment regarding information about known malpractices (financial or otherwise)
- fraud or theft against the school or suppliers
- negligence

302 In addition, staff making a disclosure must also have a reasonable belief that the disclosure is in the public interest.

303 It should be emphasised that this policy and procedure is not designed to question financial, or business decisions taken by our school, nor may it be used to reconsider any matters that have already been addressed under other procedures. Members of staff who make disclosures outside the arrangements set out here will not be protected under this policy.

Protection

401 We recognise that it can be difficult to make the decision to report a concern. However, if a concern is raised in good faith and based on reasonable belief, there should be nothing to fear. We would therefore remind employees considering raising concerns that, when covered by the Public Interest Disclosure Act 1998, they will be protected from dismissal or other detriment as long as they follow this policy and procedure[1].

402 We will not tolerate any harassment, sexual harassment or victimisation of any kind. Harassment or bullying of a whistleblower constitutes a disciplinary offence and we will take appropriate action, including disciplinary action if necessary, to protect staff when they raise a concern.

403 Any investigation into allegations of potential malpractice will not influence or be influenced by other procedures such as investigations and hearings under the disciplinary, health and wellbeing, capability, redundancy, or any other dismissal procedures that already affect member of staff or may affect them in the future.

[1] Staff may consider seeking further advice on making a protected disclosure from their trade union or the charity PROTECT.

404 Where a concern is not confirmed by a subsequent investigation no action will be taken against those reporting the matter. If, however, it is determined through an investigation that a member of staff made an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against them.

Confidentiality

501 All concerns will be treated in confidence and every effort will be made not to reveal the member of staff's identity if they so wish. At the appropriate time, however, the member of staff may need to come forward as a witness. If we are not able to resolve the concern without revealing their identity, it will be discussed with them beforehand to determine next steps.

Anonymous Concerns' Reporting

601 Whilst staff can remain anonymous if they choose, we do not encourage anonymous reporting. Proper investigation may be more difficult or impossible if further information from the person raising a concern cannot be obtained; it is also more difficult to establish whether any such allegations are credible and have been made in the public interest. People who are concerned about possible reprisals if their identity is revealed are assured that we will not tolerate any victimisation or detrimental treatment of anyone who raises a concern in the good faith in the Public Interest.

602 Concerns expressed anonymously are much less powerful but may still be considered, having taken into account:

- the seriousness of the issues raised.
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

603 The Headteacher in conjunction with the Chair of Governors will decide in each case whether a complaint made anonymously should be investigated.

Untrue Allegations

701 If a member of staff reports a concern in good faith, but it is not confirmed by the investigation, no action will be taken against that employee. If, however, an employee makes an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against them.

How to raise a disclosure

801 As a first step, concerns should initially be disclosed to the Headteacher in writing. Wherever possible, concerns should be made in writing using the template at Appendix 1. However, the Headteacher may meet with the member of staff as soon as practicable to discuss their concern, recording sufficient details as outlined in appendix 1 to enable the matter to be thoroughly investigated[2], providing a copy to the member of staff.

802 We recognise that in some cases disclosing a concern to the Headteacher may not be appropriate and in these circumstances:

- Where the concern relates to the Headteacher or member(s) of the Governing Body then it should be raised directly with the Chair of Governors.

- Where the concern relates to the Chair of Governors or full Governing Body then concerns should be raised with the Clerk to Governors who will consider the most appropriate course of action.

803 Where disclosing a concern, the member of staff will need to provide the following information:

- The nature of the concern and why they believe it to be true
- The background and history of the concern (giving relevant dates where appropriate)
- That they are exercising their right to raise this concern under the whistleblowing policy.

[2] The headteacher may request attendance from their HR Service Provider and a minute taker at any meetings relating to the concern raised under this policy.

Although they are not expected to prove beyond doubt the truth of the suspicion, they will need to demonstrate to the person contacted that they have a genuine concern and there are reasonable grounds for the concern relating to suspected wrongdoing or malpractice within the school.

804 The member of staff may bring a may invite their trade union representative or a work colleague to be present during any meetings or interviews in connection with the concerns raised.

Investigating a disclosure

901 Once a member of staff has raised a concern as outlined above, the Headteacher **within 10 working days** will carry out an initial assessment and inform the member of staff of the scope of any investigation and timescale (if known) for completion. This may include the member of staff being required to attend additional meetings to provide further information as part of any investigation.

902 The Headteacher may consider it appropriate to refer the concern to an external agency for consideration in advance of any internal investigation. This may be appropriate where concerns about child safeguarding, potential criminal activity or unsafe working practices are raised. Where this is deemed appropriate, no further internal investigation should be undertaken until clearance is given by the relevant agency concerned and the matter is referred back to school.

903 Where necessary, the school may appoint an investigator or team of investigators, including those with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable the school to minimise the risk of future wrongdoing.

904 The school accepts that staff concerned need to be assured that the matter has been properly addressed, therefore the Headteacher will aim to keep the member of staff appropriately informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the school from providing specific details of the investigation or any outcomes or disciplinary action taken as a result. All persons involved in this process should treat any information about the investigation as confidential.

Outcome of disclosure

1001 Whilst it cannot always be guaranteed that the outcome will be in line with the member of staff's expectation, concerns will always be dealt with fairly and in an appropriate way.

1002 Where the Headteacher (or Chair of Governors) have investigated the matter, they will produce a written report into the concerns raised, outlining conclusions and any necessary actions to be taken. The member of staff raising the concerns will be notified of any outcomes and these, together with a copy of the report (anonymised), will be made available to all Governors.

1003 Where an external investigator has been appointed their written report will be submitted to the Headteacher (or Chair of Governors) who must act on any recommendations made within the report. The member of staff raising the concerns will be notified of any outcomes and these, together with a copy of the report (anonymised), will be made available to all Governors.

1004 There is **no right of appeal** against any decisions taken under this policy and procedure.

External Disclosure

1101 Staff who are not satisfied with how concerns disclosed to the school have been dealt with may choose to report them externally to an appropriate body, details of which are shown below:

- The Local Authority
- A diocesan authority (for Church schools).
- The Police – for concerns of criminal behaviour.
- Any Prescribed Person or Body (e.g., Ofsted, Ofqual, Children Commissioner or NSPCC) – a full list can be found at

https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies

Independent support and advice

1201 If the member of staff is unsure and wishes to seek support they may wish to speak to their trade union. In addition, information and advice for employees/workers is also available from the Charity Protect at: https://protect-advice.org.uk who can be contacted by telephone on (020 3117 2520) or via their online email service.

Report to Governing Body

1301 The Headteacher will report to governors the outcome of whistle blowing investigations, anonymising the detail, but confirming the outcome and any actions arising from the investigation.

APPENDIX 1: Raising A Concern Form

PRIVATE AND CONFIDENTIAL - RAISING A CONCERN

Section 1: To be completed by the person initially raising the concern and/or the manager to whom the concern was raised. (Where anonymity is required, please leave section 1 blank)	
Name of person raising concern: (may be anonymous)	
Job title	
Contact address. Telephone Email	
Relationship with subject of allegations (for example manager, colleague, none, etc.)	
Section 2: Brief outline of nature of concern and dates. (Please outline nature of concern providing details of suspected wrongdoing including name(s), job title(s), date(s), timescale(s), place, and other relevant information). **Please use additional sheets if necessary**	

Section 3: Declaration (leave signature blank if anonymous)
Signature: (of person raising initial concern) _____ Please print name: _____ Date: _____

Section 4: To be completed by the manager to whom the concern was raised:	
Name	
Job title	
Telephone Place of work Email	
Relationship with subject of allegations (for example manager, colleague, none, etc.	

Additional information obtained from the person raising the concern to help clarify the nature of the concern, if applicable.
Signature: (of person to whom complaint is raised) _____ Please print name: _____ Date: _____