

MORE HOUSE SCHOOL

POLICY

WHISTLE-BLOWING

Rationale

Staff (including supply staff, volunteers and contractors) must acknowledge their individual responsibility to bring matters of concern to the attention of the Headmaster and/or if necessary due to the circumstances, the Chairman of the Board of Governors and the school's Independent Person, Ms Christie Clark. Although this can be difficult, this is particularly important where the welfare of children may be at risk. It might be that you are the first to recognise that something is wrong but may not feel able to express your concerns out of a feeling that this would be disloyal to colleagues or you may fear harassment or victimisation. These feelings, however natural, must never result in a child or young person continuing to be unnecessarily at risk. It is often the most vulnerable children or young persons who are targeted and therefore this policy has been put in place in order to help safeguard their welfare. This policy has been developed in accordance with guidance issued in [Keeping Children Safe in Education, September 2021](#), as well as [government guidance on whistle-blowing](#). We also take into account the [Public Interest Disclosure Act 1998](#).

Definition of whistle-blowing

'Whistle-blowing' means the confidential raising of problems or concerns within the School in accordance with the provisions of this policy. This will include any illegal, immoral, irregular, dangerous or unethical activity under their employer's control. Examples of whistle-blowing include (but are not limited to):

- Criminal offences, such as fraud or corruption
- Pupils' or staffs' health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment

A whistle-blower is a person who raises a genuine concern relating to the above.

Not all concerns about the School count as whistle-blowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistle-blowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance.

There are existing procedures in place to enable staff to raise grievances about their own employment. The Whistle-blowing Policy is intended to cover serious concerns that fall outside the scope of other procedures, in accordance with the Public Interest Disclosure Act 1998.

Purposes

The purpose of this policy is to:

- Give staff clear information regarding the reasons why concerns should be raised.
- Give staff clear information on how to raise concerns about potential wrongdoing in or by the School.
- Give broad details of how the School will respond to such concerns.
- Encourage individuals affected to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated and that their confidentiality will be respected.
- Let all staff know the protection available to them if they raise a whistle-blowing concern.
- Assure staff that they will not be victimised for raising a legitimate concern through the steps set out in the policy even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue).

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Reasons for whistle blowing

- each individual has a responsibility for raising concerns about unacceptable practice or behavior;
- to prevent the problem worsening or widening;
- to protect or reduce risks to others;
- to prevent becoming implicated yourself;
- to ensure what you believe is 'wrong doing' is highlighted to the appropriate persons so as to enable them to consider the authenticity of the claim and its ramifications, including the consequences upon others.

Reasons that may prevent people from whistle-blowing:

- starting a chain of events which spirals;
- disrupting the work or project;
- fear of getting it wrong;
- fear of repercussions or damaging careers;
- fear of not being believed.

How to Raise a Concern

- You should voice your concerns, suspicions or uneasiness as soon as you feel you can. The earlier a concern is expressed the easier and sooner action can be taken.
- If there is immediate concern for the welfare of any child you must speak to the Designated Safeguarding Lead (DSL), or one of the deputies to the DSL, or the Headmaster, in person or by telephone immediately; do not rely on e-mail or a voicemail message.
- Try to pinpoint exactly what practice is concerning you and why.
- If you have concerns about a staff-member or other adult working within the School, you must contact the Headmaster in person or by telephone as soon as possible.
- If your concern is about the Headmaster, the concern should be reported to the Chairman of the Board of Governors directly, using internal extension number 1010, available to all members of the staff.
- In addition, should you feel you wish to report the concern to someone outside the School, you can contact the Independent Person, Ms Christie Clark, on telephone number 01252 797610 (610 internally).
- Make sure you get a satisfactory response; do not let matters rest.
- Ideally, you should put your concerns in writing, outlining the background and history, giving names, dates and places where you can.
- A member of staff is not expected to prove the truth of an allegation but will need to demonstrate sufficient grounds for the concern.
- Any adult may contact the Local Authority's Designated Officer for allegations of abuse by telephoning 0300 123 1650 (option 3), or contact the police directly by telephoning 999.

How the School will Respond

If a concern is raised the School will look into it carefully and thoroughly. The person receiving the concern will ensure that a written account of it is made. This will help with the subsequent investigation by making sure that everyone involved is clear about what is being raised.

When a concern is raised, managers should undertake the following actions:

- Take the concern seriously
- Consider the concerns fully and objectively

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- Recognise that raising a concern can be a difficult experience for employees
- Ensure confidentiality

Initial Enquiry

In order to protect the individuals, and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. If urgent action is required, this will be taken before any investigation is conducted.

The purpose of the initial enquiry is to ascertain if the conduct or behaviour involves a senior manager or a member of staff, so that further enquiries and investigation can be progressed accordingly.

Concerns or allegations raised which fall within the scope of established procedures will be referred for consideration under those procedures.

Investigation

A referral of a concern will be acknowledged within ten working days, with an indication of how the School proposes to deal with the matter and the likely timescale. If it is not possible to complete the initial enquiries within the ten working days, the email or letter of acknowledgement will explain. If a decision is made not to investigate, the reasons will be given.

The employee raising the concern with a manager, will, subject to legal constraints, be advised in writing of the outcome of the investigation and, where appropriate, what action is being taken. This may include changes to working practices to ensure that a similar situation does not occur again.

Written records of all interviews will be kept throughout the investigation together with written details of any action taken. The investigation will result in a written report and recommendations for corrective action, which will be passed to the manager responsible for deciding whether formal action shall be taken.

Outcome of the investigation

Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether or not a referral is required to an external organisation, such as the local authority or police.

They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.

Beyond the immediate actions, the Headmaster, Board of Governors and other staff if necessary will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

Anonymous Allegations

This policy encourages staff to put their name to their allegation whenever possible.

The School will take all concerns raised seriously. However, concerns expressed anonymously are much less powerful

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but will be considered at the discretion of the School. In exercising this discretion the factors to be taken into account would include;

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

Confidentiality

All concerns will be treated in confidence but, at the appropriate time, the whistle-blower may be asked to come forward as a witness, and this will be discussed with them.

Safeguarding against Harassment or Victimisation

No member of staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern.

The School will take a zero tolerance approach to any act of harassment or victimisation (including informal pressures) and will take appropriate action to protect staff when they raise a genuine and legitimate concern.

Unsubstantiated Allegations

Staff are encouraged to raise concerns when they believe there potentially to be an issue. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern.

If, however, an allegation is made frivolously, maliciously or for personal gain, disciplinary action may be taken.

Self-reporting

There may be occasions where a member of staff has a personal difficulty, perhaps a physical or mental health problem, which they know to be impinging on their professional competence. Staff-members have a responsibility to discuss such a situation with their line manager so professional and personal support can be offered to the member of staff concerned. Whilst such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of children.

Safeguarding concerns

If the concern involves a member of staff and a possible or potential child protection issue, you must inform the Headmaster immediately. All other concerns about a pupil must be reported to the DSL.

Monitoring Arrangements

Confidential records will be kept of all matters raised through the Whistle-blowing Policy and the Board of Governors will receive reports with an assessment of the effectiveness of the policy and any emerging patterns.

Conclusion

It is recognised that whistle-blowing can be difficult and stressful. However, it is a duty required of all adults working

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at More House School, in accordance with the Code of Conduct, which they have signed. Advice and support is available from your line-manager, Head of Department, Head of Year, the Headmaster or his deputies, the DSL or deputies to the DSL, and the Bursar.

Appendix A - The following School policies and documents form important continuations of this policy:

- Safeguarding and Child Protection policy
- Code of Conduct for Staff
- Communication policy
- Confidentiality policy
- Equal Opportunities policy
- Managing Allegations of Abuse and Low Levels Concerns Made Against Staff policy
- Pupil Concerns policy
- Stress in the Workplace policy