



'We can and we will'

GLEBE PRIMARY SCHOOL

Confidential Reporting / Whistleblowing Policy

Mission Statement

At Glebe Primary School, we believe in an ethos that values the whole child. We strive to enable all children to achieve their full potential academically, socially and emotionally.

Aims

- To ensure that employees and volunteers feel confident in raising serious public interest concerns by providing clear avenues through which those concerns can be raised.
- To provide reassurance that those who raise legitimate public interest concerns will not be victimised or punished.
- To ensure that the method of raising such concerns is made clear and to provide for an appropriate response.

Introduction

At Glebe, there may be times when staff have concerns about what is happening at work. Usually these concerns are easily resolved. However, when they are about unlawful conduct, financial malpractice, health and safety risks to the public or to other employees, damage to the environment, possible fraud or corruption, sexual or physical abuse of clients or any other unethical conduct, it can be difficult to know what to do.

Some staff may be worried about raising such issues or may want to keep the concerns to themselves, perhaps feeling it's none of their business or that it's only a suspicion. To some, it may feel that raising the matter would be disloyal to colleagues, managers or to the school. There may be times when staff have decided to say something but find that they have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next. Some staff may also have concerns over harassment or victimisation should they report an issue.

The school is committed to the highest possible standards of openness, probity and accountability. It expects that its employees who have serious concerns about anything that is happening in the school, to come forward and raise those concerns. The school, however, recognises that employees need to be supported and have confidence that any concerns will be treated appropriately. The purpose of this policy, which is based on the Public Interest Disclosure Act 1998, is to enable staff to raise concerns about such malpractice at an early stage and in the right way. The school would rather that the matter is raised when it is just a concern, rather than wait for proof.

This policy applies to all employees of schools and academies.

While this policy refers to "employee" throughout, its principles are intended to apply equally to:

- Contractors working for the school on school premises

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- Suppliers
- Casual and agency workers
- Volunteers
- Governors

All groups should have access to the same support and procedures with respect to any whistleblowing concern raised.

This policy is primarily for concerns where the interests of others or of the school itself are at risk. If staff have concerns about their employment with the council this should be raised through the council's Grievance Procedure. The council also has policies to cover the situation where you personally are the victim of bullying or harassment.

Policy Purpose

The purpose of this policy is to:

- Enable employees to raise concerns at an early stage and in the right way. The school would rather that matters were raised when it is just a concern rather than wait for proof.
- Encourage employees and others to feel confident in raising serious concerns by providing clear channels through which those concerns can be raised.
- Reassure those who raise concerns that they will not suffer any repercussions in doing so and that they will not be subjected to any detrimental treatment as a result of raising those concerns.

This policy will ensure that all those who raise concerns receive a response and are kept informed about how their concerns are being dealt with. However, this does not necessarily mean that they will be privy to any detail in relation to the investigation into the concern raised or any specific outcomes.

Definition of Whistle-Blowing

Whistle-blowing covers concerns made that report wrongdoing that is "in the public interest". Examples of whistle-blowing include (but aren't 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

In schools, this can include:

- A misuse of school funds and/or financial malpractice
- Safeguarding concerns with respect to children or any action that negatively affects the welfare of children (see Appendix 1)
- SATS maladministration
- An unauthorised disclosure of confidential information
- Any conduct likely to damage the school's reputation.

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

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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.

When staff have a concern, they should consider whether it would be better to follow our staff grievance or complaints procedures.

Protect (formerly Public Concern at Work) has:

- [Further guidance](#) on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure which can be found at <https://protect-advice.org.uk/what-is-the-difference-between-raising-a-grievance-and-whistleblowing/>
- A free and confidential advice line <https://protect-advice.org.uk/advice-line/>

What Issues are Covered by Whistleblowing?

Malpractice and wrongdoing will include the following, but the precise coverage and terms used can vary:

- Any unlawful act, whether criminal or a breach of civil law .
- Maladministration, as defined by the Local Government Ombudsman.
- Breach of any statutory Code of Practice.
- Breach of, or failure to implement or comply with Financial Regulations or standing orders.
- Any failure to comply with appropriate professional standards.
- Fraud, corruption or dishonesty.
- Actions which are likely to cause physical danger to any person, or to give rise to a risk of significant damage to property.
- Loss of income to the school.
- Abuse of power, or the use of the school's powers and authority for any unauthorised or ulterior purpose.
- Discrimination in employment or the provision of education.
- Any other matter that staff consider they cannot raise by any other procedure.

Safeguards

1. The school is committed to good practice and high standards and wants to be supportive of employees. The school recognises that the decision to report a concern can be a difficult one to make. If staff raise a genuine concern under this policy, they should have nothing to fear because they will be doing their duty to the school and its community.

2. The school will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect staff when concerns are raised in good faith.

3. Any investigation into allegations of potential malpractice will not influence, or be influenced by, any disciplinary or redundancy procedures that already affect members of staff.

4. All concerns will be treated in confidence and every effort will be made not to reveal an individual's identity if they so wish. At the appropriate time, however, that individual may need to come forward as a witness.

5. Whenever possible, names should be put to your allegation as concerns expressed anonymously are much less powerful. The school will exercise discretion in considering anonymous allegations if the issue raised is sufficiently serious - e.g. involving individual or public safety or corruption, waste or other impropriety - and credible and there is a likelihood of confirming the allegation from other sources.

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6. If an allegation is made in good faith, but it is not confirmed by the investigation, no action will be taken against the individual who raised concerns. If, however, an allegation is made frivolously, maliciously or for personal gain, disciplinary action may be taken.

7. The school recognises that the decision to report a concern can be a difficult one to make. Where the employee raises a genuine concern under this policy, they should have nothing to fear as they will be considered as discharging their duty to the school.

8. An investigation into concerns raised under this policy will not influence or be influenced by any formal procedures (e.g. disciplinary or redundancy) that the employee may already be subject to.

Anonymous Allegations

The whistleblower should, whenever possible, put their name to the allegation, as concerns expressed anonymously may be less likely to result in effectively dealing with the concerns raised. Anonymous allegations will be considered at the discretion of the school and will largely depend upon whether the issue raised is sufficiently serious. In exercising their discretion, the factors likely to be taken into account by the school can include:

- Whether the concern involves safeguarding and/or child protection issues
- Whether the concern involves individual or public safety
- Whether the concern involves corruption, waste or other impropriety
- The credibility of the concern
- Whether there is a likelihood of confirming the allegation from other sources.

Confidentiality

All concerns will be treated in confidence and all reasonable efforts will be made to avoid revealing the employee's (whistleblower's) identity if requested by them.

It may not be possible to keep an employee's identity confidential whilst carrying out a thorough investigation and they may need to be identified as a witness at an appropriate time. If it becomes necessary to reveal the employee's identity, they will be informed in writing and of the reasons why it is necessary to identify them.

Untrue or Malicious Allegations

If an employee makes a disclosure which they reasonably believe to be in the public interest, which is not confirmed by the investigation, no action will be taken against them. The outcome will be notified to the employee. The school will deem the matter to be concluded and that it should not be raised again unless new evidence comes to light.

If, however, an employee makes an allegation frivolously, maliciously, vexatiously or for personal gain, disciplinary procedures will apply.

How to Raise a Concern

1. It is normally expected that concerns will be raised in the first instance with an individual's immediate line manager (a member of SLT) or the Head Teacher. However, if the matter is of an extremely sensitive or serious nature, or it is believed that management could be involved, the chair of governors should be approached. The line of contact is as follows:

- Line Manager/ SLT
- Head Teacher
- The Chair of Governors- Mr John Buckingham - 01895 462385 (school office)

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These officers will also be able to provide further advice/guidance on how to pursue matters of concern:

- The Monitoring Officer - 01895 250617 (ext. 0617)
- Director of Finance - 01895 556074 (ext. 6074)
- Head of Democratic Services - 01895 250636 (ext. 0636)
- The Chief Executive - 01895 250569 (ext. 0569)
- Concerns can also be addressed to the confidential hotline number on 0800 389 8313 or emailed to fraud@hillingdon.gov.uk

2. Concerns may be raised verbally or in writing. When making a written report, it is suggested that details of the background and history are given, with relevant dates and specific reasons for concern about the situation.

3. Individuals will need to demonstrate to the person contacted that there are reasonable grounds for their concern.

4. Individuals may be accompanied at any meetings or interviews in connection with the concerns they have raised by their trade union or other representative, or a friend. Any companion must respect the confidentiality of the disclosure and any subsequent investigation.

Safeguarding Children and Young People

Separate to the obligations under this policy, all employees have a duty to report concerns about the safety and welfare of pupils/students

Concerns about any of the following should be reported to the school's designated senior person for Child Protection (DSL):

- physical abuse of a pupil/student
- sexual abuse of a pupil/student
- emotional abuse of a pupil/student
- neglect of a pupil/student
- an intimate or improper relationship between an adult and a pupil/student

The reason for the concern may be the actions of a colleague (including a more senior colleague), a governor, another pupil/student or someone outside the school. Whatever the reason, concerns must be reported. Failure to report a Child Protection related allegation will be in itself, a disciplinary matter.

External Contacts

The primary aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases the employee should not find it necessary to alert anyone externally. However, the school recognises that in some circumstances the employee may not feel able to disclose a matter internally or that it may be more appropriate for them to report their concerns to an external body because, for example:

- The matter is of an extremely sensitive or serious nature or
- The employee believes management to be involved or
- The employee believes the school will cover it up or
- The employee believes the school will treat them unfairly if they complain, or
- Where the employee has raised the matter previously, but the concern has not been dealt with.

Employees are strongly encouraged to seek advice before reporting a concern to anyone external. Advice can be sought from their Trade Union or Citizens Advice.

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The school should stress to the employee that if they choose to take a concern outside the school, it is the employee's responsibility to ensure that confidential information, in whatever format, is not disclosed to a third party.

Where a disclosure to an external body is justified and/or necessary, in those circumstances the employee can properly report matters to the following:

- The Local Authority Director of Children's Services
- The Chief Education Officer or equivalent
- The Local Authority Designated Officer (LADO) The school's Diocese or equivalent (for faith schools)
- Prescribed Person or Body for example:
 - Protect (formerly Public Concern at Work), an independent charity that provides confidential advice on whistleblowing issues: 020 3117 2520 or visit their website at www.pcaw.co.uk
 - Ofsted (whistleblowing helpline): 0300 123 3155 or whistleblowing@ofsted.gov.uk
 - Education & Skills Funding Agency (ESFA): 0370 267 0001 or [ESFA Complaints Procedure](#)
 - Children's Commissioner for England: 020 7783 8330 or info.request@childrenscommissioner.gov.uk NSPCC: 0800 028 0285 or [NSPCC Whistleblowing Advice Line](#).

As a last resort, and provided it is appropriate in all the circumstances, the employee may choose to raise their concern externally to someone other than the prescribed persons/bodies, for example:

- Union or professional association
- The Police
- A Member of Parliament (MP).

It will very rarely, if ever, be appropriate to alert the media. This also carries a risk of disclosing confidential information to unauthorised third parties. If the employee approaches the media, they can expect in most cases to lose their whistleblowing law rights and protection.

How the School will Respond

1. Once a concern has been raised, it will be looked into to assess, initially, what action should be taken.

2. As appropriate, matters raised may:

- be investigated by management/SLT, the Monitoring Officer, internal audit, through the disciplinary process.
- be referred to the police.
- be referred to the external auditor.
- form the subject of an independent investigation.

3. In deciding how to deal with the concern raised, the overriding principle which the school will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures e.g. child protection, will normally be referred for consideration under those procedures. 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.

4. **Within ten working days** of a concern being raised, the person, with whom you have raised the concern, will write to you acknowledging that the concern has been received and indicating how the school proposes to deal with the matter. If there is an ongoing investigation, the person responsible for that investigation will provide you with updates on how the matter is progressing and inform you of the outcome of the investigation, subject to any legal constraints.

5. The school will take steps to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, the school will arrange for you to receive advice about the procedure.

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 head teacher, 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.

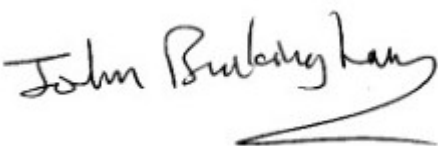
Links with other policies

This policy links with our policies on:

- Staff Grievance policy
- Complaints procedure
- Safeguarding policy
- Disciplinary Policy and Procedures

Reviewed: February 2024

Review Date: February 2025



A handwritten signature in black ink, appearing to read 'John Bullock', is written over a horizontal line. The signature is enclosed within a thin black rectangular border.

Chair of Governors

Appendix 1 - Whistleblowing & Safeguarding

Safeguarding children at risk requires everyone to be committed to the highest possible standards of openness, integrity and accountability. The school is committed to encouraging and maintaining a culture where staff feel able to raise a genuine safeguarding concern and are confident that it will be taken seriously.

In the context of safeguarding, "whistleblowing" is when someone raises a concern about the well-being of a child at risk. This whistleblowing policy therefore has a key role to play in safeguarding children.

When raising a safeguarding concern, the following policies may be relevant:

- School's Safeguarding and Child Protection Policy
- School's Policy on [Dealing with Allegations or Concerns Raised Against](#)

[Teachers and Other Staff School's Code of Conduct](#)

- Guidance for Safer Working Practice for Professionals Working in Education Settings [prevailing Safer Recruitment Consortium guidance](#)
- Keeping Children Safe in Education (KCSIE) [prevailing DfE guidance](#)
- Working Together to Safeguard Children [prevailing DfE guidance](#)
- London Safeguarding Children Procedures and Practice Guidance [prevailing London Safeguarding Children Partnership guidance](#).

It is the clear responsibility of all to act on any concerns or information that gives them concern about the safety and wellbeing of a child or children within the school or within the care of the school or arising from circumstances or events out of school. Such a concern in a whistleblowing context may be related to:

- Conduct or behaviour of an employee towards an individual child or children that causes concern
- Information that suggests an employee is unsuitable to work with children
- A belief that the Designated Safeguarding Lead, Senior Managers or Governors have failed to take appropriate action in response to safeguarding concerns raised.

This policy outlines to whom those concerns may be reported. In dealing with concerns around safeguarding/child protection matters in particular, [the London Safeguarding Children Procedures and Practice Guidance](#) state that if a member of staff believes that a reported allegation is not being dealt with appropriately by the school, they should report the matter to their Local Authority's Multi Agency Safeguarding Hub (MASH) or Local Authority Designated Officer (LADO).