



Whistle Blowing policy

This school is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment

Governor's Committee Responsibility:

Personnel

Date Approved:

Autumn Term 2023

Review Period:

Two yearly

Next Review Date:

Autumn Term 2025

The Limpsfield Grange Values:

At Limpsfield Grange we believe in working together to make a difference.

We are a tolerant community; we accept value and understand others.

We care for all members of our community without judgement.

We are responsible for our own learning, behaviour and actions.

We accept that sometimes things go wrong. We work together to take responsibility for our mistakes and for putting things right.

We are a respectful community and we treat others as we would like to be treated, even if they have different views and opinions to our own.

We understand that good behaviour helps us to prepare for life beyond Limpsfield Grange.

We are positive and resilient. We celebrate difference in everything that we do.

We are all proud to be part of the Limpsfield Grange community.

July 2023

Navex Global

Freephone 0800 069 8180

Navex Global is an external and independent organisation which provides a confidential hotline service for whistle blowing. Navex Global can be contacted any time, night or day, in complete confidence with any relevant concerns. The call will not be traced or monitored.

<https://secure.ethicspoint.eu/domain/media/en/gui/107090/index.html>

Limpsfield Grange School

Whistle Blowing policy

Background and rationale

Limpsfield Grange School is committed to the highest possible standards of honesty, openness, probity and accountability. It seeks to conduct its affairs in a responsible manner, to ensure that all its activities are openly and effectively managed, and that Limpsfield Grange's integrity and the principles of public interest disclosure are sustained.

In line with this commitment, all members of staff and those working on behalf of the Limpsfield Grange who have serious concerns about any aspect of the school's work are encouraged to come forward and voice those concerns to their immediate manager and/or the Headteacher or the Chair of Governors. Staff not only have the right but also a duty to report any improper actions or omissions, particularly where the welfare of young people may be at risk. Where any member of staff decides to report a serious incident within the scope of this policy, anonymously or otherwise, this will be treated as a 'protected' disclosure' i.e. there will be no adverse repercussions for the member of staff. Staff are encouraged to use an external, independent and confidential service provided by Navex Global, who can be contacted on their free helpline number 0800 069 8180 and via the website link as follows:

<https://secure.ethicspoint.eu/domain/media/en/gui/107090/index.html>

Aims of the policy

Employees are often the first to realise that there may be something seriously wrong within a school. However, staff may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to Limpsfield Grange School, and they may also fear harassment or victimisation. Each person working for Limpsfield Grange School needs to realise that they not only have the right, but also a duty to report any improper actions or omissions.

Limpsfield Grange School also recognises and appreciates that employees who raise concerns regarding malpractice or wrongdoing are an asset to the school, and not a threat. This policy makes it clear that they can raise concerns without fear or victimisation, subsequent discrimination or disadvantage. The Whistle Blowing policy is intended to encourage and enable employees to raise serious concerns within the school.

The policy aims to:

- Encourage staff to feel confident in raising serious concerns and to question and act upon concerns about practice
- Provide avenues to raise those concerns and receive feedback on any action taken
- Ensure that staff receive a response to their concerns and that they 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 made any disclosure in good faith

Who is covered by the policy?

The policy applies to all Limpsfield Grange School employees whether full-time or part time, permanent or temporary and those carrying out work for the school on school premises, for example, agency workers, contractors, consultants. It also covers providers of works, services and supplies, including the school's external contractors and those providing services under a contract with the school in their own premises.

However, to facilitate the reading of this policy, the terms 'staff' or 'members of staff' have been used, with the intention to cover all individuals mentioned above.

Scope of the policy

There are existing procedures in place to enable employees to lodge a grievance relating to their own employment. The Whistle Blowing policy is intended to cover serious concerns that may fall outside the scope of other procedures, in accordance with the Public Interest Disclosure Act 1998. These include:

- Conduct which is an offence or a breach of law
- Failure to comply with a legal obligation
- Disclosures related to miscarriages of justice
- Health and safety risks, including risks to the public or students as well as other staff
- Damage to the environment
- Information relating to the above issues that has been, or is likely to be, deliberately concealed

Examples of the above categories are likely to include:

- The unauthorised use or misuse of public funds
- Possible fraud and corruption
- Sexual, physical or psychological abuse of students at the school
- Harassment & bullying of staff
- Breaches of codes of conduct
- Malpractice in examinations and assessments.

Therefore, any serious concerns that a member of staff has about any aspect of the Limpsfield Grange's service provision or the conduct of staff or others connected with the school can be reported under this Whistle Blowing policy where that member of staff has a reasonable belief in the validity of those concerns and they relate to one of the specified areas set out above.

Safeguarding against harassment or victimisation

Limpsfield Grange School is committed to good practice and high standards and wants to be supportive of employees. It is recognised that the decision to report a concern can be a difficult one to make. If a member of staff has a reasonable belief that what they are saying is true, they have nothing to fear because they will be doing their duty to their employer and/or those for whom they are providing a service.

Limpsfield Grange School will take a zero-tolerance approach to any act of harassment or victimisation (including informal pressures). The school will take appropriate action to protect staff when they raise a concern, by supporting the member of staff and consider action under the appropriate procedure (for example Disciplinary) against the person or persons responsible for the reported acts, provided the member of staff:

- Discloses the information in good faith
- Believes the concern to be true
- Does not act maliciously or make false allegations
- Does not seek any personal gain, and
- Provided the allegations relate to one of the categories covered by the scope of the policy and referred to above.

There are national guidelines to help you as a whistle blower. See the government guidance: <https://www.gov.uk/whistleblowing>

There is also a whistleblowing charity Protect that has a helpline on 020 3117 2520. This helpline offer independent and confidential advice to those who are unsure whether, or how, to raise a public interest concern.

Unsubstantiated allegations

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

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 him/her.

Anonymous allegations

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

Where a concern is raised via the external confidential Navex Global Service, the whistle blower can choose to provide Navex Global with name and contact details which will not be passed to the school without express permission from the individual. This enables Navex Global to ask for further information on the concern, if required.

Limpsfield Grange will take all concerns raised seriously. When carrying out an initial review of a concern, the school will consider the following factors:

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

How to raise a concern

There are three ways in which to raise a concern:

- Employees may raise concerns with their immediate line manager or a member of the Senior Leadership Team or, if it is believed that such managers are involved, the Headteacher, the Chair of the Governing Body, or Limpsfield Grange School's Designated Safeguarding Lead (DSL) may be approached. (Contact details may be found at the back of this policy). Should the whistle blower feel the need to involve a person external to the school they may approach their HR service provider CEFM Tel: 01494 836260 or email helpline@cefm.co.uk

Concerns may be raised verbally or in writing. Employees who wish to make a written report are asked to provide the background and history of the concern (including relevant dates) and the reason why they are particularly concerned about the situation.

The earlier the concern is expressed, the easier it is to take action. In order to assist with the investigation, employees should provide as much detail and supporting evidence as possible. Employees are not expected to prove that an allegation is true, only to have sufficient grounds for concern.

The whistle blower may invite a recognised Trade Union representative or a work colleague to be present during any meetings or interviews in connection with the concerns raised.

- While concerns will usually be raised internally, Limpsfield Grange School recognises that employees may feel unable to do this, and that they may wish to contact an independent, external organisation, such as

Navex Global, in order to report something. Navex Global is an external and independent organisation, which specialises in providing a confidential hotline service for whistle blowing and can be contacted any time, night or day, in complete confidence with any relevant concerns. The call will not be traced or monitored. Freephone 0800 069 8180.

How Limpsfield Grange School will respond

Limpsfield Grange School will investigate and respond to all concerns raised by employees or service users through any channels including Navex Global and the Contact Centre.

While it is not essential that the concerns be provided in writing, the person receiving the concern will, ensure that a written account of it is made. This will help with the subsequent investigation by facilitating clear record-keeping.

When a concern is raised directly with a senior member of staff they should undertake the following actions:

- Take the concern seriously
- Consider the concerns fully and objectively
- Recognise that raising a concern can be a difficult experience for employees
- Ensure confidentiality
- Refer to a manager of appropriate seniority, to agree the level at which the concern will be investigated and identify who will take responsibility for the co-ordinating the enquiry.

Staff members who are under investigation will not be involved in the investigation process, this will include members of the Governing Body.

Advice and guidance on the use of the Whistle Blowing policy can be obtained from CEFM our HR providers.

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. The overriding principle, which the school will have in mind, is that of the public interest. If urgent action is required, this will be taken before any investigation is conducted.

Purpose of the initial inquiry is to ascertain if the conduct or behaviour involves a member of the school staff, a member of the Senior Leadership Team or other member of staff, so that further enquiries and investigation can be progressed accordingly.

Preliminary Review

Preliminary review establishes need to carry out an investigation. Further to the results of the initial enquiry and preliminary review, and at the discretion of Senior Leadership Team /Governing Body, the following steps will then need to be considered:

- Concerns or allegations, which fall within the scope of specific procedures, e.g. child protection or discrimination issues, will normally be referred for consideration under those procedures
- Where there is any financial impropriety, the concern should be referred to the Governing Body, before taking any other action
- Ensure that matters of a criminal nature are reported to the Police, after consultation with Internal Audit
- Whether the disciplinary or other relevant management policies, procedures and processes of the school need to be applied
- Appointment of an officer to carry out the investigation under these procedures.

Investigation

Depending on the nature of concerns, investigation may be carried out under the school's Dignity at Work Policy, Capability Policy, Disciplinary Policy.

Investigation Timescales

Within 14 days of a Navex Global report being received, the person who is dealing with the concern that has been raised will respond in writing:

- Acknowledging that the concern has been received
- Supplying information on staff support mechanisms, and
- Advising whether further investigations or action is required and, if not, why not.

A further update will also be provided 28 days after the report was received, advising of additional progress made and the estimated date a final response will be available.

If the whistle blower has chosen to remain anonymous and non-contactable, they need to contact Navex Global or their original route in order to receive updates.

Investigation process

The impartial investigating manager appointed to undertake the investigation will establish the facts of the matter and assess whether the concern has foundation and can be resolved internally. Other people may need to be interviewed to provide further information and/or clarification concerning the issue(s) raised.

It is essential that written records of all interviews 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. Where any meeting is arranged involving an individual member of staff, which can be off-site, a recognised Trade Union representative or a work colleague may also attend. Limpsfield Grange will take steps to minimise any difficulties which may be experienced as a result of raising a concern. For instance, if a member of staff is required to give evidence in criminal or disciplinary proceedings, the school will arrange for them to receive appropriate procedural and/or legal advice.

A member of staff raising a concern will be, subject to legal constraints, advised in writing of the outcome of the investigation and, where appropriate, what action is being taken.

Data Protection

When an individual makes a disclosure, Limpsfield Grange School will process any personal data collected in accordance with its Data Protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

Monitoring Arrangements

The School Business Manager in consultation with the Headteacher has overall responsibility for the maintenance and operation of this policy. The School Business Manager maintains a record of concerns raised and the outcomes (but in a form which does not compromise confidentiality) and will report as necessary to the Surrey County Council.

The Financial regulations state that the School Business Manager will ensure that whistle blowing procedures are defined, documented, widely circulated and reviewed at appropriate intervals, in consultation with a Headteacher.

The practical aspects of monitoring are to assess whether:

- The policy is being used appropriately
- Concerns are being handled and investigated properly
- There are any discernible patterns of concern across the school
- The policy has been effective in identifying and deterring malpractice, and more needs to be done to raise the awareness of the policy

Links with other policies

In investigating financial irregularities, this policy should be read in conjunction with the Counter Fraud Strategy and Framework Strategy which sets out how the financial irregularities should be investigated.

<https://secure2.sla-online.co.uk/v3/File/DownloadFile?fileGuid=09ef3ce8-a5ca-4909-b084-1c8c9e5102e2&type=PageSectionDocuments>

This policy does not replace the corporate complaints procedures. The flowchart and other information available on the Service for Schools Portal shows the relationship between the Whistle Blowing policy and separate Limpsfield Grange procedures such as Dignity at Work, Grievance Policy and Disciplinary Policy.

<https://secure2.sla-online.co.uk/v3/File/DownloadFile?fileGuid=e71f22d7-b04c-48df-8c47-599054c6cb61&type=PageSectionDocuments>

As this policy is in addition to Limpsfield Grange complaints procedures, and other statutory reporting procedures applying to some services, managers are responsible for making service users aware of the existence of these procedures.

Other related policies:

- Child Protection and Safeguarding Policy
- Complaints Policy and procedure
- Data Protection Policy
- Dignity at Work Policy
- Disciplinary & Capability procedures
- Equality & Diversity Policy
- Grievance Policy and Procedure
- Health and Safety (COVID19) policy
- Staff Behaviour Policy
- Staff Wellbeing & Resilience Policy

Review

The Governing Body of Limpsfield Grange School adopted this policy on:

It will be reviewed on:

Signed

Dated

Additional Contact Details:**Designated Safeguarding Lead**

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Chair of Governors

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