

Whistleblowing Policy

2023 /2024



Introduction

The School is committed to the highest standards of openness, probity and accountability. It expects employees, and others that it deals with, who have serious concerns about any aspect of the School's work, to come forward and voice those concerns. The phrase 'whistle-blowing' in this procedure refers to the disclosure internally or externally by employees of malpractice, as well as illegal acts or omissions at work.

The staff and governors of Queen Margaret Primary School Queen Margaret Primary School seek to run all aspects of school business and activity with full regard for high standards of conduct and integrity. In the event that members of school staff, parents, governors or the school community at large become aware of activities which give cause for concern, Queen Margaret Primary School has established the following whistleblowing policy.

This acts as a framework to allow concerns to be raised confidentially and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion. Throughout this policy, the term *whistleblower* denotes the person raising the concern or making the complaint. It is not meant in a pejorative sense and is entirely consistent with the terminology used by Lord Nolan as recommended in the Second Report of the Committee on Standards in Public Life: Local Spending Bodies published in May 1996.

Queen Margaret Primary School is committed to tackling fraud and other forms of malpractice and treats these issues seriously. We recognise that some concerns may be extremely sensitive and has therefore developed a system which allows for the confidential raising of concerns within the school environment but also has recourse to an external party outside the management structure of the school. Queen Margaret Primary School is committed to creating a climate of trust and openness so that a person who has a genuine concern or suspicion can raise the matter with full confidence that the matter will be appropriately considered and resolved.

The provisions of this policy apply to matters of suspected fraud and impropriety and not matters of more general grievance which would be dealt with under the Queen Margaret Primary School grievance/code of conduct procedures.

AIMS AND SCOPE OF THIS PROCEDURE

The type of activity or behaviour which Queen Margaret Primary School considers should be dealt with under this policy includes:

- manipulation of accounting records and finances
- inappropriate use of school assets or funds
- decision-making for personal gain
- any criminal activity
- abuse of position
- fraud and deceit
- serious breaches of school procedures which may advantage a particular party (for example tampering with tender documentation, failure to register a personal interest)
 - disclosures related to miscarriages of justice
 - health and safety risks, including risks to the public as well as other employees (where the concerns raised have not been addressed through normal departmental procedures)
 - damage to the environment
 - sexual or physical abuse
 - other unethical or unprofessional conduct

Any serious concerns that employees have about any aspect of service provision, or the conduct of employees or members of the Governing Body/Council or others acting on behalf of the Governing Body/Council, can be reported under this Procedure. This may be about something that:

- makes an employee feel uncomfortable in terms of apparent non-adherence to known standards
- appears to be contrary to the requirements of the Council's Standing Orders and Code of Conduct
- falls below established standards of practice
- may amount to improper conduct appears to be an attempt to mislead

SAFEGUARDS

Harassment or Victimisation

1. The School recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from the person(s) who is the subject of the complaint. However, if employees believe that what they raise as a concern to be the truth and in the public interest they should be confident that they are fulfilling their duty to their employer and those for whom they are providing a service.
2. The School will not tolerate any form of sexual, racial or general harassment or victimisation and will take appropriate action to protect employees, when they raise a concern in the public interest,

from suffering a detriment (including bullying or harassment) either from the employer or from co-workers.

3. Any investigation under this procedure, into allegations of potential malpractice will be dealt with separately to any grievance, disciplinary or redundancy procedure concerning an employee. Equally, any investigation will not be influenced by any such procedures involving an employee. However the outcome of the investigation may lead to action under other school's procedures.

CONFIDENTIALITY

What action should the whistleblower take?

Queen Margaret Primary School encourages the whistleblower to raise the matter internally in the first instance to allow those school staff and Governors in positions of responsibility and authority the opportunity to right the wrong and give an explanation for the behaviour or activity.

The person should initially treat the matter with the appropriate levels of confidentiality and respect. Queen Margaret Primary School has designated a number of individuals to specifically deal with such matters and the whistleblower is invited to decide which of those individuals would be the most appropriate person to deal with the matter:

Sara Bennion - Headteacher

Emily Bytheway/Joy Pegg - Co-Chairs of Governors,

The Whistleblower may prefer to raise the matter in person, by telephone or in written form marked private and confidential and addressed to one of the above-named individuals. All matters will be treated in strict confidence and anonymity will be respected wherever possible.

Alternatively, if the whistleblower considers the matter too serious or sensitive to raise within the internal environment of the school, the matter should be directed in the first instance to the Gloucestershire Council's Head of Audit. Head of Legal and Democratic Services Gloucestershire County Council Shire Hall Gloucester GL1 2TZ Telephone: (01452) 425201

The Council has its own procedures for dealing with such matters and will ensure every effort to respect the confidentiality of the whistleblower. The Council will ensure relevant officers of the Department for Children, Schools and Families informed as appropriate. In addition information and advice can be obtained from the charity Public Concern at Work. This charity offers free legal advice in certain circumstances to people concerned about serious malpractice at work.

Their literature states that matters are handled in strict confidence and without obligation.

Contact details for the charity are as follows:

Public Concern at Work Suite 306

16 Baldwins Gardens

London

EC1N 7RJ

Telephone number 020 7404 6609

How will the matter be progressed?

The individual(s) in receipt of the information or allegation [the investigating officer(s)] will carry out a preliminary investigation. This will seek to establish the facts of the matter and assess whether the concern has foundation and can be resolved internally.

The initial assessment may identify the need to involve third parties to provide further information, advice or assistance, for example involvement of other members of school staff, legal or personnel advisors, the police, the DCSF or the Council.

Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer(s), possibly in conjunction with the governing body, will consider how best to report the findings and what corrective action needs to be taken.

This may include some form of disciplinary action or third party referral such as the police. The whistleblower will be informed of the results of the investigation and the action taken to address the matter. Depending on the nature of the concern or allegation and whether or not it has been substantiated, the matter will be reported to the governing body and the Council.

If the whistleblower is dissatisfied with the conduct of the investigation or resolution of the matter or has genuine concerns that the matter has not been handled appropriately, the concerns should be raised with the investigating officer(s), the governing body and/or directed to the Council

Respecting confidentiality

Wherever possible Queen Margaret Primary School seeks to respect the Queen Margaret Primary School will not tolerate any attempt to victimise the whistleblower or attempts to prevent concerns being raised and will consider any necessary disciplinary or corrective action appropriate to the circumstances.

ANONYMOUS ALLEGATIONS

In order to ensure that employees receive protection of the Public Interest Disclosure Act 1998 employees should put their name to their allegation. Concerns expressed anonymously are sometimes less credible. Anonymous concerns and allegations, whether made to the Head Teacher or the Governing Body, will therefore be investigated 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' factual evidence.

UNTRUE ALLEGATIONS

Individuals are encouraged to come forward in good faith with genuine concerns with the knowledge they will be taken seriously. If individuals raise malicious unfounded concerns or attempt to make mischief, this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances.

HOW TO RAISE A CONCERN

Employees who wish to raise a serious concern should do so verbally or in writing (marked 'Confidential') to the Head Teacher or Chair of Governors

Alternatively the concern can be raised by writing to

Monitoring Officer

Gloucestershire County Council

Shire Hall

Gloucester GL1 2TZ

Or employees may wish to use the Council's 24 hour "whistle blowing" answerphone service on Gloucester 01452 - 427052 to report any concern relating to possible fraud, corruption, conduct or mal-practice/administration

Employees who wish to make a written statement/report are invited to set out:

- the background and history of the concern
- relevant dates, person involved
- details of supporting evidence

Although employees are not expected to prove an allegation they will need to demonstrate that the disclosure is in the public interest.

Further action

This Procedure is intended to assist employees who wish to raise concerns within the School and it is hoped that employees will be satisfied with any action taken. However, if they are not, and they feel it is right to take the matter outside the School/Council, the following organisations are possible contact points:

External Contact	Contact Information
Health & Safety Executive	Tel: 0300 003 1647 or Online form: Raising your concern
Environment Agency	Tel: 03708 506 506 or Website: Environment Agency
External Auditors	
The Financial Conduct Authority/Prudential Regulation Authority	
Department for Work and Pensions	Telephone: 0800 854 440 or you can also report suspected benefit fraud online
Serious Fraud Office	Website: Reporting serious fraud, bribery or corruption

Trade Union	
Her Majesty's Revenue & Customs	Tel: 0800 788 887 or Website: Reporting Tax Evasion
Relevant Voluntary Organisation	
Charity Commission	Tel: 0300 066 9197 or Email: whistleblowing@charitycommission.gsi.gov.uk
Police	Telephone 101 or In an emergency telephone 999
Public Concern at Work	Tel: 0207 404 6609
Ofsted	Complaints about schools and childminders Contact https://www.gov.uk/complain-about-school Complaints about other providers Ofsted inspects Contact https://contact.ofsted.gov.uk/online-complaints

If employees do decide to take the matter outside the School/Council, they must ensure that they do not disclose to a third party any School/Council confidential information. If employees are in any doubt, they are strongly advised to seek confidential advice before taking any action to ensure that they are not putting themselves in a vulnerable position.

Conclusion

Existing good practice within Queen Margaret Primary School in terms of its systems of internal control both financial and non-financial and the external regulatory environment in which the school operates ensure that cases of suspected fraud or impropriety rarely occur.

This whistleblowing policy is provided as a reference document to establish a framework within which issues can be raised confidentially internally and if necessary outside the management structure of the school. This document is a public commitment that concerns are taken seriously and will be actioned

Prepared by: Model GCC Policy used

Approved by: Full Governing Body Meeting – 21st September 2023

Date: September 2023

Review due: September 2024

Approved:



Sara Bennion Headteacher



Emily Bytheway



Joy Pegg

Co-Chairs of Governors