



Whistleblowing Policy

This non-contractual policy provides the staff of Oundle School (OS) and Laxton Junior School (LJS) (together “the School”) with guidance on the procedure for reporting suspected wrongdoing and the protection available.

The policy may be amended by the School from time to time as it deems appropriate, for example in order to incorporate changes in law or in line with good practice. The Human Resources department will ensure this policy is regularly reviewed by the Leadership team and that key changes are highlighted and communicated as appropriate.

1. Purpose

- 1.1. We are committed to conducting ourselves with honesty and integrity, and expect all our staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.
- 1.2. We have found that often it is our staff, or people who work on behalf of the School, who are best placed to notice if something is below the standards we expect. This policy has been developed to encourage people who work for, or on behalf of the School, to feel confident in raising serious concerns internally either informally or formally, in a confidential manner. The policy also makes a provision, if necessary, for concerns to be raised externally.
- 1.3. This policy is not to be used where other, more appropriate, procedures exist, e.g. those outlined in the Grievance Policy that are to be used by staff to raise concerns about their own personal employment situation.

2. Protected Disclosures

- 2.1 Whistleblowing is when a person working for, or on behalf of the School, reports a suspected serious wrongdoing or danger at work (‘a disclosure’).
- 2.2 Disclosures relating to Child Protection / Safeguarding matters are outlined in section 4.
- 2.3 Disclosures that are given legal protection under the Public Interest Disclosure Act (‘PIDA’) are allegations of, or deliberate concealment of, bribery, a criminal offence, failure to comply with legal obligations, a miscarriage of justice and creating a serious risk to health and safety or the environment (‘Protected Disclosures’). However, this policy also covers disclosures (as defined at 2.1) including (but not limited to) disclosures about any allegations of, or deliberate

concealment of, safeguarding concerns or practices, unethical conduct, unauthorised disclosure of confidential information and conduct likely to damage the School's reputation.

2.4 Staff are legally protected against detrimental treatment or dismissal as a result of them making any Protected Disclosure. To obtain protection staff in almost all circumstances must disclose information to the School in the first instance in line with the procedure set out in this policy.

3. Scope

3.1 This policy applies to all members of staff including volunteers. In addition, any third parties, such as agency staff, self-employed workers or contractors working for the School, may use this procedure to make the School aware of concerns within the parameters of this policy.

4. Safeguarding

4.1 Nothing within this policy is intended to prevent any person from complying with their statutory obligations in accordance with *Keeping Children Safe in Education* and the *Prevent* duty.

4.2 **Safeguarding Policy:** You should raise any initial safeguarding concerns about a child with a member of the Safeguarding Team at either OS or LJS in accordance with the School's Safeguarding Policy.

5. Confidentiality

5.1 Concerns raised under this procedure will be treated in the strictest confidence as far as is reasonably possible. The person raising the concern will not be disclosed to the alleged perpetrator(s) without prior consent. Should a circumstance arise where we are unable to resolve the concern without revealing the person's identity, e.g. evidence is needed in court, we will discuss this with the person raising the concern.

5.2 Whilst we give due consideration to concerns raised anonymously, anonymous reporting is not well suited to this procedure. Proper investigation may be more difficult or impossible if we cannot obtain direct information from the person. We recognise that in order to preserve confidentiality it may be appropriate, in some cases, to raise concerns orally rather than in writing. However, people wishing to raise concerns under this procedure are encouraged to do so in writing.

6. Internal Procedure

6.1 We encourage everyone, in the first instance, to report incidents and raise any concerns in an informal and relatively low-key way with their manager. The manager may be able to agree a way of resolving the concern quickly and effectively.

6.2 Where the concern has not been/cannot be resolved informally, you should raise your concern formally, preferably in writing, to your Head of Department or to their senior manager. Where this is not possible, e.g., the Head of Department or the senior manager is potentially at fault, you should submit the disclosure to the Head if the person with the concern is teaching staff and the Head or Bursar if the person with the concern is support staff, dependant on the reporting line. If the disclosure involves the Bursar, then you should report to the Head. If the

disclosure involves the Head, then you should report directly to the Chair of the Governors via chairman@oundleschool.org.uk.

- 6.3 You will be invited to an initial meeting to discuss your concern. Whilst not a statutory right, you may, if you wish to do so, bring a work colleague to any meetings under this policy. Your companion must also respect the confidentiality of the disclosure and subsequent investigation. A summary of your concern will usually be taken, a copy of which will normally be provided to you after the meeting.
- 6.4 Concerns raised will be promptly and thoroughly investigated, usually by a senior manager. You may be required to attend additional meetings in order to provide further information. Whilst we will endeavour to keep you informed of the progress and the decision, we may not be able to provide detailed or precise information, where this would infringe a confidence owed by the School to another person or body concerned, or where restricted by legal constraints.
- 6.5 Any appropriate and/or corrective action required further to the investigation will be pursued by the Leadership team should it be deemed that further action is required.
- 6.6 Any person not satisfied that their concerns are being handled properly has the right to raise this issue, in confidence, with the School's Governing Body. This should be made in writing and addressed to the Chair of the Governors via chairman@oundleschool.org.uk.

7. External Procedures for Protected Disclosures

- 7.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, it should not be necessary to alert anyone externally.
- 7.2 However, where all internal processes have been exhausted, and the person raising a Protected Disclosure has raised the issues for review with the School's Governing Body without resolution, then it may be appropriate for that person to approach the responsible statutory body. When making a Protected Disclosure to the responsible statutory body, the person will be protected from any possible reprisals or victimisation where they:
 - reasonably believe the concern to be true before making such a disclosure;
 - reasonably believe that there has been committed, is being committed or is likely to be committed an act of wrongdoing covered by the PIDA, as described in Section 2; and
 - do not make the disclosure for personal gain
- 7.3. The Government has prescribed a list of appropriate bodies for external reporting of a Protected Disclosure. The main bodies are as follows, but a full list is available on the Government's website, <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies#education>.
 - Northamptonshire Safeguarding Children Partnership (details in School Safeguarding Policy).
 - The Department for Education (DfE)
 - The Independent School's Inspectorate (ISI)

- The Charity Commission for England and Wales
- The Police
- The Health and Safety Executive (HSE)
- The Environment Agency
- The Information Commissioner
- The National Society for the Prevention of Cruelty to Children (NSPCC)

7.4 In exceptional circumstances, under PIDA (see Section 2), a person may be entitled to raise a concern directly with an external body, without first following the School's internal procedure, if the Protected Disclosure is made without personal gain and they reasonably believe:

- that there has been committed, is being committed or is likely to be committed an act of wrongdoing covered by the PIDA, as described in Section 2.
- that the allegations are substantially true; and
- that exceptionally serious circumstances apply.

7.5 A person should seek confidential advice before reporting a concern to an external body. The independent whistleblowing charity, Protect, operates a confidential helpline. Their contact telephone number is 020 3117 2520 and their website address is <https://protect-advice.org.uk/>.

7.6 Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a supplier or contractor. The law allows a person to make a Protected Disclosure in good faith with a third party, where that person reasonably believes the concern relates mainly to the third party's actions or something that is legally the third party's responsibility. We encourage you to report such concerns internally first. If you have such a concern, you should contact your reporting manager for guidance.

8. Publication and the Media

8.1 Once all avenues outlined within this policy have been exhausted, it will rarely if ever be appropriate to approach a commercial body or the media with details of suspected wrongdoing. A person should seek confidential advice from [Protect](#) before reporting a concern to a commercial body or the media. Where any person approaches a commercial body or the media, and/or where the concern is disclosed for personal gain, the School may take disciplinary action including summary dismissal for gross misconduct.

8.2 A person will only be protected from any possible reprisals or victimisation when making a Protected Disclosure (Section 2) to a commercial body or the media where they:

- reasonably believe the concern to be true before making such a disclosure;
- reasonably believe that there has been committed, is being committed or is likely to be committed an act of wrongdoing covered by the PIDA, as described in Section 2;
- do not make the disclosure for personal gain; and
- reasonably believe that the School would conceal or destroy the evidence OR reasonably believes that they be victimised by the School OR have previously raised the issue with the School and/or statutory body.

9. Disciplinary Procedures

- 9.1 A person taking their concerns outside of the School should ensure that no disclosure of confidential information takes place. Confidential information, if disclosed in circumstances not covered by the PIDA (Section 2), could leave the person liable to serious disciplinary proceedings.
- 9.2 Where the School determines that a person has made false allegations maliciously, or with a view to personal gain, that person will be dealt with under the School's disciplinary procedure and may result in dismissal including summary dismissal for gross misconduct.

10. Protection from Reprisals or Victimisation

- 10.1 It is understandable that a whistleblower is sometimes worried about possible repercussions. We aim to encourage openness. You will not be disciplined, victimised, suffer reprisals or any other detrimental treatment for raising a genuine and legitimate concern providing they have followed the School's whistleblowing procedure. If you believe that you have suffered any such treatment, please refer to the School's Grievance Policy.
- 10.2 You must not threaten or retaliate against a whistleblower in any way. Anyone involved in such conduct will be subject to appropriate disciplinary action.

11. Data Protection

- 11.1 When an individual makes a disclosure, the 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 purpose of dealing with the disclosure.

Reviewer	AN
Post of Reviewer	Director of HR
Last Review	October 2021: Removal of Covid-19 addendum reference
Review Date	September 2023
Reviewed by OS	September 2023
Reviewed by LJS	September 2023
Signed off by both Schools	September 2023
Next Review (max. 3 years)	September 2024