



Whistleblowing Policy

Introduction

The staff and governors of the 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 the school community at large become aware of activities which give cause for concern, the School has established the following whistleblowing policy, or code of practice, which 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.

The School is committed to tackling fraud and other forms of malpractice and treats these issues seriously. The School recognises 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.

The 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 school's grievance procedures.

When might the whistleblowing policy apply?

The type of activity or behaviour, which the 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 or failure to register a personal interest)

What action should the whistleblower take?

The School encourages the whistleblower to raise the matter 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 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.

Name & Position

Alex McGrath, Head

Marie Gage, Bursar

Nigel Williams, Deputy Head

Eddie Falshaw, Deputy Head

Mike Ward, Assistant Head, Director of IT

Ken Sullivan, Assistant Head, Head of Sixth Form

If it is believed that a member of the Leadership Group is involved, or it is felt that a satisfactory response to the concern has not been provided, the whistleblower should approach the Chair of the governing body.

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.

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 raised 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, auditors or the police.

Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer(s), in conjunction with the Head and or 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 by the Head.

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) or with the Head, if he/she has not already been involved and otherwise with the Chair of the governing body.

Respecting Confidentiality

Wherever possible, the School seeks to respect the confidentiality and anonymity of the whistleblower and will as far as possible protect him/her from reprisals. The 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.

Raising unfounded malicious concerns

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.

Conclusion

Existing good practice within the 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 appropriate issues can be raised confidentially. This document demonstrates a commitment that concerns are taken seriously and will be responded to.