



WOODCOTE HOUSE SCHOOL

WHISTLEBLOWING POLICY

Woodcote House seeks to conduct its business honestly and with integrity at all times, and is committed to complying with all relevant laws and regulations which apply to the school and its employees. However, we acknowledge that all organisations face the risk of activities going wrong from time to time, or of unknowingly harbouring malpractice. We believe we have a duty to take appropriate measures to identify such situations and attempt to remedy them. By encouraging a culture of openness and accountability within the organisation, we believe that we can help prevent such situations occurring. We expect all staff to maintain high standards as set out in our Staff Handbook and Staff Behaviour Policy, also, we expect them to report any wrongdoing or behaviour that falls short of these fundamental principles.

It is the responsibility of all employees to raise any concerns that they might have about serious misconduct or malpractice by the school or any of its employees. The aim of this policy is to ensure that our employees are confident that they can raise any matters of genuine concern without fear of reprisal, retaliation or unfair treatment, in the knowledge that they will be taken seriously and that the matters will be investigated appropriately and regarded as confidential.

This policy sets out the procedure by which staff can report concerns about workplace practices. It is for guidance only and does not form part of any contract of employment.

1. LEGISLATIVE FRAMEWORK

Whistleblowing is the disclosure of information by an employee or working which relates to some danger, fraud or other illegal or unethical conduct in the workplace. The Employment Rights Act 1996 as amended by the Public Interest Disclosure Act 1998 governs the making of disclosures concerning workplace activities and is intended to protect employees who blow the whistle on bad practice from being subjected to any detriment or unfairly dismissed as a result.

2. PERSONNEL RESPONSIBLE FOR IMPLEMENTATION OF THE POLICY

- (a) The Headmaster has overall responsibility for Woodcote House's policy on whistleblowing. Responsibility for monitoring and reviewing the operation of the policy and any recommendations for change within the school resulting from investigations into complaints under the policy lies with the Senior Management Team (The Headmaster, the Bursar and the Deputy Head)
- (b) Members of the Senior Management Team (SMT) have a specific responsibility to facilitate the operation of this policy and to ensure that members of staff feel able to raise concerns without fear of reprisals in accordance with the procedure set out below.

- (c) All members of staff are responsible for the success of this policy and should ensure that they take steps to disclose any wrongdoing to malpractice of which they become aware. If they have any questions about the content or application of this policy, they should contact a member of the SMT for clarification/training.
- (d) In the event that a member of staff has concerns about the Headmaster, he or she should raise them with Mr. Nick Paterson, the School Principal.

3. WHO IS COVERED BY THE POLICY?

This policy applies to all individuals working for Woodcote House at all levels, whether they are senior members of staff, teaching, administrative, domestic or ground staff.

4. WHAT DISCLOSURES ARE COVERED?

- (a) This policy is distinct from our Anti-Bullying Policy. If you have a complaint relating to your personal circumstances in the workplace, then you should use the Anti-Bullying Policy. Concerns about malpractice within the school which affects or could affect, for example, pupils, parents, members of the public or other members of staff should be raised using the procedure set out in this policy.
- (b) You should use this policy if you have a genuine concern that there are reasonable grounds for believing that:
 - * a criminal offence has been committed, is being committed, or is likely to be committed; or
 - * a person has failed , is failing, or is likely to fail to comply with their legal obligations; or
 - * a miscarriage of justice has occurred, is occurring, or is likely to occur; or
 - * the health and safety of any individual has been, is being, or is likely to be endangered; or
 - * the environment has been, is being or is likely to be damaged; or
 - * any of the above are being, or are likely to be, deliberately concealed.
- (c) In the context of Woodcote House’s business, particular concerns which may fall within the terms of this policy include, for example, breach of confidentiality, provision of negligent advice, financial fraud, harassment occurring to others and health and safety issues. In general, this policy covers actions or omissions you consider are illegal, contrary to policy or established procedure or outside the scope of an individual’s authority, actions which could damage Woodcote’s reputation and conflicts of interest. However, only disclosures concerning those actions falling strictly within the categories in paragraph 4(b) will be eligible for the relevant statutory protection.
- (d) We will value any concerns reported in good faith under this procedure. If you are uncertain whether the matters concerning you are within the scope of this policy, we encourage you to report the concerns to the Headmaster in accordance with the procedure set out in paragraph 6.

5. TO WHOM SHOULD A DISCLOSURE BE MADE?

- (a) In the first instance, any concerns should be raised with the Headmaster or, in his absence, with the Deputy Headmaster.
- (b) If the disclosure involves the Headmaster in any way, you should report it directly to Mr. Nick Paterson.

- (c) We will always endeavour to handle investigations promptly and fairly, but if you have made a disclosure under the procedure outlined in paragraph 6 and you are not satisfied with the investigation or its conclusion, you should approach Mr Nick Paterson directly detailing your concerns.
- (d) The aim of this policy is to provide an internal framework for reporting, investigating and remedying any workplace wrongdoing. It is therefore hoped that it will not be necessary for staff to alert external organisations. However, in very serious circumstances, or following an internal report which has not been addressed, we recognise that it may be appropriate for you to report your concerns to an external body. A full list of appropriate regulatory bodies is available from an independent charity called Public Concern at Work, who can be contacted by telephone on 020 7404 6609.

6. HOW SHOULD A DISCLOSURE BE MADE?

- (a) You can raise your concerns with the Headmaster in person or in writing. You must state that you are using the Whistleblowing Policy and specify whether you wish your identity to be kept confidential. The Headmaster will ask you to formalise your concerns in writing either before or after the first meeting and there is a pro forma whistleblowing disclosure form available on the internet for this purpose. The Headmaster will acknowledge receipt of your formal written disclosure and keep a record of further action taken.
- (b) You are entitled to be accompanied by a workplace colleague or union representative at any meeting with the Headmaster under this procedure. Your companion will be asked to respect the confidentiality of your disclosure and any subsequent investigation.
- (c) We recognise that disclosures made under this policy may involve highly confidential and sensitive matters and that you may prefer to make an anonymous disclosure. However, we regret that we cannot guarantee to investigate all anonymous allegations. Proper investigation may prove impossible if the investigator cannot obtain further information from you, give you feedback, or ascertain whether your disclosure was made in good faith. It is preferable for whistleblowers to reveal their identity to the Headmaster and measures can be taken to preserve confidentiality if appropriate (see paragraph 8 on confidentiality).

7. INVESTIGATION OF DISCLOSURE

- (a) Woodcote House is committed to investigating disclosures fully, fairly, quickly and confidentially where circumstances permit. Following your submission of a formal written disclosure, the Headmaster or the SMT or Mr. Nick Paterson will acknowledge receipt within five working days and make appropriate arrangements for investigation.
- (b) The length and scope of the investigation will depend on the subject matter of the disclosure. In most instances, the Headmaster will carry out an initial assessment of the disclosure to determine whether there are grounds for a more detailed investigation to take place or whether the disclosure is, for example, based on erroneous information. In any event, a report will be produced and copies will be provided to the Senior Management Team, if appropriate, and to you. If you are dissatisfied with the investigation, you should refer to paragraph 5(c).
- (c) If a longer investigation is considered necessary, we will usually appoint an investigator who may have specialist knowledge of the subject matter of the disclosure. Recommendations for change will also be invited from the investigator to enable us to minimise the risk of recurrence of any malpractice or impropriety which has been uncovered. The SMT will then be responsible for reviewing and implementing these recommendations.
- (d) So far as the Headmaster considers it appropriate and practicable, you will be kept informed of the progress of the investigation. However, the need for confidentiality may prevent us giving you specific details of the investigation or actions taken. It is not normally appropriate to set a specific time frame for completion of investigations in advance, as the diverse nature of disclosures contemplated makes this

unworkable. We will, however, aim to deal with all disclosures in a timely manner and with due regard to the rights of all individuals involved.

- (e) We recognise that there may be matters that cannot be dealt with internally and in respect of which external authorities will need to be notified and become involved either during or after our investigation. We will endeavour to inform you if a referral to an external authority is about to or has taken place, although we may need to make such a referral without your knowledge or consent if we consider it appropriate.

8. CONFIDENTIALITY

Every effort will be made to keep the identity of an individual who makes a disclosure under this policy confidential, at least if any formal investigation is under way. In order not to jeopardise the investigation into the alleged malpractice, you will also be expected to keep the fact that you have raised a concern, the nature of the concern and the identity of those involved confidential. There may, however, be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity. This may occur in connection with associated disciplinary or legal investigations or proceedings. If in our view such circumstances exist, we will make efforts to inform you that your identity is likely to be disclosed. If it is necessary for you to participate in an investigation, the fact that you made the original disclosure will, so far as is reasonably practicable, be kept confidential and all reasonable steps will be taken to protect you from any victimisation or detriment as a result of having made a disclosure. It is likely, however, that your role as the whistleblower could still become apparent to third parties during the course of an investigation.

9. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

- (a) No member of staff who raises genuinely held concerns in good faith under this procedure will be dismissed or subjected to any detriment as a result of such action. Detriment includes unwarranted disciplinary action and victimisation. If you believe that you are being subjected to a detriment within the workplace as a result of raising concerns under this procedure, you should inform the Headmaster immediately. Staff who victimise or retaliate against those who have raised concerns under this policy will be subject to disciplinary action.
- (b) If an investigation under this procedure concludes that a disclosure has been made maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action. Those choosing to make disclosures without following this procedure or anonymously may not receive the protection outlined in paragraph 9(a).

10. CORRECTIVE ACTION AND COMPLIANCE

As part of the investigation into disclosures made under this policy, recommendations for change will be invited from the investigative team to enable Woodcote House to minimise the risk of the recurrence of any malpractice or impropriety which has been uncovered. The Senior Management Team will be responsible for reviewing and implementing these recommendations in the future.

11. WHISTLE-BLOWING HELPLINE

Should staff/students feel the need for external advice before approaching those in para 5 above, the NSPCC whistle-blowing helpline number is 0800 028 0285.

12. MONITORING AND REVIEW OF POLICY

- (a) The Headmaster, in conjunction with the SMT, will be responsible for the periodic review of this policy from a legislative and operational perspective.

- (b) The Headmaster has responsibility for ensuring that any personnel who may be involved with administration or investigations carried out under this policy are adequately experienced and qualified.
- (c) Members of staff are invited to comment on this policy and suggest ways in which it might be improved by contacting the Headmaster.

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