



## **HERSCHEL GRAMMAR SCHOOL**

# **"WHISTLEBLOWING" POLICY AND PROCEDURE**

<b>Date approved:</b>	<b>27 September 2016</b>
<b>*Date for revision:</b>	<b>October 2017</b>
<b>Responsibility:</b>	<b>Full Governing Board</b>
<b>Consultation:</b>	<b>n/a</b>
<b>Approved by full Governing Body:</b>	<b>27 September 2016</b>
<b>Author:</b>	<b>Judith Vucic Business Manager</b>

\*subject to any relevant changes in legislation or other appropriate guidelines

## CONTENTS

<b>Introduction .....</b>	<b>3</b>
<b>Independent Advice .....</b>	<b>4</b>
<b>What is malpractice, abuse or wrongdoing? .....</b>	<b>4</b>
<b>The school's assurances to employees .....</b>	<b>4</b>
<b>How to raise a concern .....</b>	<b>5</b>
<b>How the school will handle the matter .....</b>	<b>5</b>
<b>Anonymous allegations .....</b>	<b>6</b>
<b>How to raise a concern – externally .....</b>	<b>6</b>
<b>Review of this Policy .....</b>	<b>6</b>

## APPENDICES

<b>APPENDIX A - List of recognised Trade Unions .....</b>	<b>7</b>
<b>APPENDIX B - Illustrations of malpractice, abuse or wrongdoing .....</b>	<b>9</b>
<b>APPENDIX C - List of external bodies .....</b>	<b>10</b>

## **1. Introduction**

1.1 Herschel Grammar School is committed to the highest possible standards of openness, probity and accountability in the delivery of education to the pupils that attend the school. Whilst the school has put in place a wide range of rules, regulations, procedures and codes of practice to deliver this commitment, malpractice and/or wrongdoing unfortunately may occur.

1.2 This policy applies to all the people that we deal with including: employees, trainees, agency staff, independent consultants, volunteers, contractors, suppliers, elected and co-opted Governors and members of the public.

1.3 Employees are often the first to realise that there may be something seriously wrong within the School. However, you may be worried about raising such issues or may want to keep the concerns to yourself because you may consider that it is none of your business or that it is only a suspicion. You may also feel that raising the matter would be disloyal to your colleagues, managers or to the school itself. Also, you may decide to say something but find that you have not spoken to the right person, or you have raised the issue in the wrong way and are not sure what to do next. It is worth remembering that your Trade Union, professional organisation or regulatory body can play a valuable role in assisting you raise your concerns under this policy.

1.4 The School is not prepared to tolerate any such malpractice, abuse or wrongdoing and it expects employees, and others that we deal with, who have concerns about what is happening at work to come forward and voice those concerns. This policy has been introduced by the School to enable you to raise your concerns about such malpractice or wrongdoing at an early stage and in the right way, without fear of victimisation, subsequent discrimination or disadvantage. The policy is intended to encourage and enable you to raise concerns within the School (see Para's 5 & 8) or if you feel that this is not appropriate then externally (see Para. 8) rather than overlooking a problem.

1.5 The School has particular responsibility for protecting the welfare of children and vulnerable adults; employees are under an obligation to raise concerns about the abuse of such people.

## **2. Independent Advice**

2.1 If you are unsure whether to use this procedure or you want independent advice at any stage you may contact:

Public Concern at Work  
CAN Mezzanine  
7-14 Great Dover Street  
London  
SE1 4YR

Tel: 020 7404 6609 Fax: 020 7403 8823 Email: [whistle@pcaw.org.uk](mailto:whistle@pcaw.org.uk)

2.2 Public Concern at Work is a registered charity that promotes accountability and good governance in organisations and responsibility amongst individuals. It has been at the forefront of recent developments in self-regulation and public interest Whistleblowing. Its lawyers can give you free, confidential advice at any stage about how to raise a concern about serious wrongdoings or malpractice at work.

Alternatively, you may wish to seek assistance from your Trade Union or professional organisation.

## **3. What is Malpractice, Abuse or Wrongdoing?**

3.1 Malpractice, abuse and wrongdoing can include a whole variety of issues and some are listed in Appendix "B". However, this is not a comprehensive list but is intended to illustrate the sort of issues which may be raised under this policy.

3.2 The procedures set out in this policy are an addition to the school's Complaints Procedures and any statutory reporting procedures.

3.3 This policy is primarily for concerns where the interests of others or of the School itself are at risk and thus if you are aggrieved as an employee about your personal position then you should use the School's existing Grievance Procedure.

## **4. The School's Assurances to Employees**

4.1 If you raise a genuine concern under this policy you will not be at risk of losing your job or suffering any form of retribution as a result. If you are acting in good faith it does not matter if you are mistaken. However, the School will view very seriously any false and malicious allegations which are made under this policy and will regard such allegations by any employee of the School as a serious disciplinary offence.

4.2 The School will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith.

4.3 If you ask us to protect your identity by keeping your confidence we will not disclose it without your consent. However, it is possible that we will be unable to resolve the concern raised without revealing your identity (e.g. because your evidence is needed in Court) but if this occurs we will discuss with you how we can proceed.

## **5. How to Raise a Concern**

5.1 Any concerns that you have may be raised orally or in writing and those who wish to make a written statement should set out the background and history of the concern (giving relevant dates) and the reasons why you are particularly concerned about the situation. The earlier you express your concern the easier it will be to take action. REMEMBER - IF IN DOUBT RAISE IT.

The School will not expect you to prove that your concern is true, but you will need to demonstrate to the person contacted that there are reasonable grounds for you to raise the issue.

It is perfectly acceptable for you to discuss your concern with a colleague and you may find it more comforting to raise the matter if there are two (or more) of you who have had the same experience or concerns.

5.2 If you are an employee and have a concern about any malpractice, abuse or wrongdoing we hope you will feel able to raise it first with your Line Manager. If you feel unable to raise the matter with your Line Manager then please raise the matter with the Headteacher.

5.3 If the above channels have been followed and you still have concerns or if you feel that the matter is so serious that you cannot discuss it with your Line Manager or you consider that it is not appropriate to do so then you can contact the Headteacher.

5.4 If you are not an employee then you can contact the Headteacher in the first instance and if not satisfied with the response the Chairman of Governors.

## **6. How the School will handle the matter**

6.1 Once you have told the appropriate person of your concern they will look into it to assess initially what action should be taken. This may involve an internal enquiry or a more formal investigation. The appropriate person will tell you who is handling the matter, how you can contact him/her and whether your further assistance may be needed. If you request, we the appropriate person will write to you summarising your concern and setting out how we he/she proposes to handle it.

6.2 It may be necessary to arrange a meeting with you and if you so wish you can be accompanied by a Trade Union representative or a work colleague.

6.3 Where it is considered appropriate, the matters raised may be referred to external agencies to investigate, e.g. the Police, external auditor or through some other form of independent inquiry. You will be told if this is going to happen.

6.4 Within 10 working days of a concern being raised by you, the person handling the matter will write to you:

- a) acknowledging that the concern has been received.
- b) indicating how the matter is proposed to be dealt with.
- c) giving an estimate of how long it will take to provide a final response.
- d) telling you whether any initial enquiries are being made.
- e) supplying you with information on staff support mechanisms.
- f) telling you whether further investigations will take place, and if not, why not.

6.5 Whilst the purpose of this policy is to enable the appropriate person to investigate your concerns of malpractice, abuse or wrongdoing and take appropriate steps to deal with it, you will be given as much feedback as can be properly given. Please note it may not be possible to tell you the precise action taken where this would infringe a duty of confidence owed to someone else.

6.6 The School will take steps to minimise any difficulties that you may experience as a result of raising the concern. Thus, if you are required to give evidence in criminal or disciplinary proceedings the School will arrange for you to receive advice about the procedure.

## **7. Anonymous Allegations**

7.1 You are encouraged to put your name to your allegation whenever possible.

Concerns expressed anonymously are much less powerful but will be considered at the discretion of the School. In exercising this discretion the factors to be taken into account will include:

- a) the seriousness of the issues raised.
- b) the credibility of the concern.
- c) the likelihood of confirming the allegation from attributable sources.

7.2 If you do raise a concern anonymously and it is considered then it will not be possible for you to be contacted, for instance to inform you of the outcome of your concern or to discuss any aspect of your concern.

## **8. How to Raise a Concern - Externally**

8.1 This policy is intended to provide you with an avenue within the school to raise concerns. Whilst we hope this policy gives you the reassurance you need to raise such matters internally, we would rather you raised a matter externally than not at all, provided you are acting in good faith and you have evidence to back up your concern.

8.2 Thus, you are completely at liberty to raise any concern externally at any time with any of the external agencies set out in Appendix "C". The telephone numbers are general contact numbers so you will need to explain the nature of your concern and ask to be put through to the appropriate Department and/or person.

## **9. Review of this Policy**

9.1 This policy will be reviewed annually by the School. The Responsible Officer for the maintenance and operation of the policy is:

The Clerk to the Governing Body  
Herschel Grammar School  
Northampton Avenue  
SLOUGH  
SL1 3BW  
Tel: 01753 520950

## APPENDIX A

### LIST OF RECOGNISED TRADE UNIONS

NAME OF UNION ADDRESS CONTACT POINT

G.M.B.  
(Southern Region)  
Cooper House  
205 Hook Road  
Chessington  
Surrey, KT9 1EA  
Tel: 020 8397 8881 Fax: 020 8397 1588 Email: [info@gmb.org.uk](mailto:info@gmb.org.uk)  
Regional Secretary: Paul Maloney

Unite the union  
Atlantic House  
Imperial Way  
Reading  
RG2 0TD  
Tel: 0118 975 0777 Fax: 0118 975 0790  
Officers: Bob Middleton

UNISON  
(South East Region)  
Reading Office  
56 Queens Road  
Reading  
RG1 4AZ  
Tel: 0800 0 857 857  
E: [southeast@unison.co.uk](mailto:southeast@unison.co.uk)

NUT  
Regional Office  
Britton House  
College Road  
Ardingly, Haywards Heath  
West Sussex  
RH17 6TT  
Tel: 01444 894 500 Fax: 01444 894 516 Email: [south.east@nut.org.uk](mailto:south.east@nut.org.uk)  
Slough: [secretary@slough.nut.org.uk](mailto:secretary@slough.nut.org.uk)

NASUWT  
South East Regional Centre  
Milestone House  
Portsmouth Road  
Send  
Surrey, GU23 7JZ  
Tel: 01483 226 130 Fax: 01483 226 139 Email: [rc-southeast@mail.nasuwt.org.uk](mailto:rc-southeast@mail.nasuwt.org.uk)

ATL

Slough Branch Contact: Ken McAdam

Tel: 020 7930 6441

Complete Contact form via Website: <http://www.atl.org.uk/branches/slough/homepage.asp>

NAHT

1 Heath Square

Boltro Road

Haywards Heath

West Sussex

RH16 1BL

Tel: 0300 30 30 333 Email: [info@naht.org.uk](mailto:info@naht.org.uk)

ASCL

130 Regent Road

Leicester

SE1 7PG

Tel: 0116 299 1122 Fax: 0116 299 1123 Email: [info@ascl.org.uk](mailto:info@ascl.org.uk)

## **APPENDIX B**

### **ILLUSTRATIVE LIST OF MALPRACTICE, ABUSE OR WRONGDOING**

1. Any unlawful act, whether criminal (e.g. theft) or a breach of the civil law (e.g. slander or libel).
2. Maladministration (e.g. unjustified delay, incompetence, neglect advice).
3. Health and safety risks, including risks to the public as well as other employees (e.g. faulty electrical equipment).
4. Abuse of children and vulnerable adults (e.g. through physical, sexual, psychological or financial abuse, exploitation or neglect).
5. Damage to the environment (e.g. pollution).
6. The unauthorised use of public funds (e.g. expenditure for improper purpose).
7. Fraud and corruption (e.g. to solicit or receive any gift/reward as a bribe).
8. Abuse of power (e.g. bullying/harassment).
9. Other unethical conduct.

## APPENDIX C

### LIST OF EXTERNAL BODIES

#### NAME & ADDRESS AREA OF CONCERN

Public Concern at Work  
CAN Mezzanine  
7-14 Great Dover Street  
London  
SE1 4YR  
Tel: 020 7404 6609 Fax: 020 7403 8823 Email: [whistle@pcaw.org.uk](mailto:whistle@pcaw.org.uk)

Local Government Ombudsman  
PO Box 4771  
Coventry  
CV4 0EH  
Tel: 0300 061 0614 Fax: 024 7682 0001 Email: [advice@lgo.org.uk](mailto:advice@lgo.org.uk)

Thames Valley Police  
Windsor Road  
Slough  
Berkshire SL1 2HH  
Tel: 101 (for all non-emergency enquiries)

Crimestoppers  
Tel: 0800 555 111  
Thames Valley Crimestoppers  
Crimestoppers Trust  
PO Box 324  
Wallington  
SM6 6BG

The Health & Safety Executive  
Priestley House  
Priestley Road  
Basingstoke  
Hants RG24 9NW  
Fax: 01256 404 100

The Environment Agency  
National Customer Contact Centre  
PO Box 544  
Rotherham  
S60 1BY  
Tel General Enquiries: 03708 506 506 Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)

Hazardous Waste Registration: 03708 502 858

Agricultural Waste Registration: 0845 603 3113

Environmental Incident Hotline: 0800 80 70 60

Floodline: 0845 988 1188 or 0345 988 1188