

Whistleblowing Policy

Stroud High School

Contents

1	Introduction	3
2	Scope and Purpose	3
3	What is Whistleblowing?	3
4	Raising a Whistleblowing Concern	4
5	Confidentiality and Data Protection	5
6	External Disclosures	6
7	Investigation and Outcome	6
8	If You Are Not Satisfied	7
9	Protection and Support for Whistleblowers	7
	Appendix 1 - Contacts	8

1 Introduction

- 1.1 The Trust Board is committed to the highest possible standards of honesty and integrity, and expects all staff to maintain these standards in accordance with Stroud High School's (the 'School') Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of 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 This policy has been implemented following consultation with the recognised trade unions.
- 1.3 This policy does not form part of any employee's contract of employment or other contract to provide services and the School may amend it at any time.

2 Scope and Purpose

- 2.1 The aims of this policy are:

To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.

To provide staff with guidance on how to raise concerns.

To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

- 2.2 This policy applies to all employees of the School, Trustees, consultants, contractors, casual and agency staff and volunteers (collectively referred to as 'staff' or 'member of staff' in this policy).

3 What is Whistleblowing?

- 3.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. The law provides protection for workers who raise legitimate concerns about specified matters or "qualifying disclosures". A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that there are wrongdoing or dangers at work. This may include:

criminal activity

miscarriages of justice

danger to health and safety

damage to the environment

failure to comply with any legal or professional obligation or regulatory requirements

bribery

financial fraud or mismanagement

negligence

breach of the School's internal policies and procedures including its Code of Conduct

conduct likely to damage the School's reputation or financial well-being

unauthorised disclosure of confidential information

unethical behaviour

the deliberate concealment of any of the above matters

- 3.2 A whistleblower is a person who raises a genuine concern relating to any of the above. If a member of staff has any genuine concerns related to suspected wrongdoing or danger affecting any of the School's activities (a whistleblowing concern) they should report it under this policy.
- 3.3 This policy should not be used for complaints relating to a member of staff's own personal circumstances, such as the way they have been treated at work. In those cases, they should use the Grievance Procedure or the Anti-Bullying Policy as appropriate.
- 3.4 If a complaint relates to a member of staff's own personal circumstances but they also have wider concerns regarding one of the areas set out at 3.1 above (for example, a breach of the School's internal policies), they should discuss with a member of the School's Leadership Team which route is the most appropriate.
- 3.5 If a member of staff is uncertain whether something is within the scope of this policy, they should seek advice from a member of the School's Leadership Team.
- 3.6 If a member of staff's concern is in relation to safeguarding and the welfare of students at the School, they should consider whether the matter is better raised under the School's Child Protection Policy and in accordance with the arrangements for reporting such concerns, i.e. via the Designated Safeguarding Lead, although the principles set out in this policy may still apply.

4 Raising a Whistleblowing Concern

- 4.1 The School hopes that staff will be able to raise any concerns with their line manager. Staff may tell them in person or put the matter in writing if they prefer. Line managers may be able to agree a way of resolving concerns quickly and effectively.
- 4.2 However, where the matter is more serious, or the member of staff feels that their line manager has not addressed their concern, or the member of staff prefers not to raise it with them for any reason, or they are the subject of the complaint, then staff can raise the matter with:

A Designated Safeguarding Lead. This is the member of the senior team who is responsible for managing whistleblowing complaints.

The Headteacher
Co-Chairs of Trustees

- 4.3 Contact details are set out in Appendix 1.
- 4.4 A meeting will be arranged with the member of staff as soon as possible to discuss their concern. The member of staff may bring a colleague or union representative to any meetings under this policy. Their companion must respect the confidentiality of their disclosure and any subsequent investigation.
- 4.5 The School will take down a written summary of the member of staff's concern and provide them with a copy after the meeting. The School will also aim to give the member of staff an indication of how it proposes to deal with the matter.

5 Confidentiality and Data Protection

- 5.1 The School hopes that staff will feel able to voice whistleblowing concerns openly under this policy. However, if a member of staff wants to raise their concern confidentially, the School will make every effort to keep their identity secret. If it is necessary for anyone investigating the concern to know the member of staff's identity, the School will discuss this with the member of staff.
- 5.2 The School does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if it cannot obtain further information from the member of staff. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the other contact points listed in paragraph 4.2 and appropriate measures can then be taken to preserve confidentiality. If the member of staff is in any doubt they can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are set out in Appendix 1.
- 5.3 Where the School receives anonymous complaints, it will investigate the complaints as far as is reasonable taking into account:
 - the seriousness of the issue raised;
 - the credibility of the concern; and
 - the likelihood of confirming the allegation from other sources.
- 5.4 As part of the application of this policy, the School may collect, process and store personal data in accordance with its Data Protection Policy. The School will comply with the requirements of Data Protection Legislation (being the UK General Data Protection Regulation and Data Protection Act 2018) and any implementing laws, regulations and secondary legislation, as amended or updated from time to time in the collecting, holding and sharing of information in relation to our workforce. Records will be kept in accordance

with the School's Workforce Privacy Notice, Retention and Destruction Policy and in line with the requirements of Data Protection Legislation.

6 External Disclosures

- 6.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases staff should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for staff to report their concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. The School strongly encourages staff to seek advice before reporting a concern to anyone external. 'Protect' (independent whistleblowing charity) holds a list of prescribed regulators for reporting certain types of concern. Their contact details are set out in Appendix 1. Alternatively, the list is available from the Department for Business, Energy & Industrial Strategy.¹

- 6.2 Whistleblowing concerns usually relate to the conduct of School staff, but they may sometimes relate to the actions of a third party, such as a contractor, supplier or service provider. In some circumstances the law will protect staff if they raise a concern with the third party directly where the member of staff reasonably believes it relates mainly to their actions or something that is legally their responsibility. However, we encourage staff to report such concerns internally first. Staff should contact their line manager or one of the other individuals set out in paragraph 4.2 for guidance.

7 Investigation and Outcome

- 7.1 Once a member of staff has raised a concern, the School will carry out an initial assessment to determine the scope of any investigation. The School will inform the member of staff of the outcome of its assessment. Staff may be required to attend additional meetings in order to provide further information.
- 7.2 In some cases, the School may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The School may, in some circumstances, appoint an external person or body to investigate the concern. The investigator(s) will collate findings on the matter and may make recommendations for change to enable the School to minimise the risk of future wrongdoing. This will be sent to the Headteacher or Trust Board for actioning.
- 7.3 The School will aim to keep the member of staff informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the School giving the member of staff specific details of the investigation, an

¹ <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>

outcome or any disciplinary action taken as a result. Staff should treat any information about the investigation as confidential.

- 7.4 If the School concludes that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

8 If You Are Not Satisfied

- 8.1 While the School cannot always guarantee the outcome staff are seeking, it will try to deal with a member of staff's concerns fairly and in an appropriate way. By using this policy, staff can help us to achieve this.
- 8.2 If the member of staff is not happy with the way in which their concern has been handled, they can raise it with one of the other key contacts in paragraph 4.2. Alternatively, they may contact the Co-Chairs of Trustees. Contact details are set out at the end of this policy.

9 Protection and Support for Whistleblowers

- 9.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. The School aims to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 9.2 Staff must not suffer any detrimental treatment as a result of raising a genuine concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a member of staff believes that they have suffered any such treatment, they should inform one of the contact people in paragraph 4.2 immediately. If the matter is not remedied they should raise it formally using the School's Grievance Procedure.
- 9.3 Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action. In some cases, the whistleblower could have a right to sue an individual personally for compensation in an employment tribunal.

Appendix 1 - Contacts

Whistleblowing Officer	School Designated Safeguarding Lead – information on how to contact them is available on all staffroom noticeboards.
Headteacher	Mark McShane mmcshane@stroudhigh.gloucs.sch.uk
Co-Chairs of Trustees	Dylan Davies – ddavies@stroudhigh.gloucs.sch.uk Geoff Marshall – gmarshall@stroudhigh.gloucs.sch.uk
Protect (Independent whistleblowing charity)	Helpline: (020) 3117 2520 Website: www.protect-advice.org.uk
The NSPCC whistleblowing helpline	Helpline: 0800 028 0285 E-mail: help@nspcc.org.uk
Department for Education	Telephone: 0370 000 2288 Website: www.gov.uk/government/organisations/department-for-education
Ofqual	Telephone: 0300 303 3344 Website: www.gov.uk/government/organisations/ofqual
Ofsted	Hotline: 0300 1233155 Whistleblowing@ofsted.gov.uk

Date of Policy: October 2023
 Date of Review: March 2025
 Reviewed by: Resources Committee
 Date of Next Review: March 2027