



Whistleblowing Policy

This policy, which applies to the whole school, inclusive of boarding, is publicly available on the school website and upon request a copy (which can be made available in large print or other accessible format if required) may be obtained from the School Office.

Owner: Director of Finance and Operations

Approving Body: Governance and Compliance Committee

Date of last Review: September 2025

Date of next Review: April 2027

Linked Policies:

- Health and Safety Policy
- Safeguarding Children – Child Protection Policy
- Discipline Policy and Procedure
- Code of Conduct
- Staff Handbook
- Grievance Procedure
- Anti-Harassment and Bullying Policy
- Prevention of Sexual Harassment Policy

INTRODUCTION

This policy and the accompanying procedure on whistleblowing enables staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, a failure to comply with legal obligations, inappropriate behaviour or unethical conduct. The policy also provides, if necessary, for such concerns to be raised outside the organisation.

The School is committed to conducting our business with honesty and integrity and expects all staff to maintain high standards in accordance with our Staff Behaviour Policy. 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 and to address them when they do occur.

AIMS

The policy on whistleblowing is intended to demonstrate that the School:-

- will not tolerate malpractice;
- encourages staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated, as appropriate;
- respects confidentiality if staff raise concerns and the School will provide procedures to maintain your confidentiality so far as is consistent with progressing the issues effectively;
- will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- will only invoke the School's Disciplinary Procedure in the case of false, malicious, vexatious or frivolous allegations; and
- will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

SCOPE

The scope of this policy explicitly includes, but is not limited to, issues relating to safeguarding. The scope of this policy is Woldingham School and any of its subsidiary undertakings.

In relation to safeguarding and promoting the welfare of young people in our care, staff must acknowledge their individual responsibility to bring matters of concern to the attention of the Designated Safeguarding Lead (DSL) and/or relevant agencies, as appropriate.

This procedure is separate from our adopted procedures regarding grievances. Staff should not use the whistleblowing procedure to raise concerns relating to their own personal circumstances, such as the way they have been treated at work. In those cases, the Grievance Procedure, Anti-Harassment and Bullying Policy or Prevention of Sexual Harassment Policy should be used, as appropriate. If uncertain whether

something is within the scope of this procedure, staff should first seek advice from the Head or Director of Finance and Operations (DFO).

This procedure enables staff to express a legitimate concern regarding suspected malpractice within the School.

WHISTLEBLOWING

Whistleblowing is the disclosure of information which relates to suspected wrongdoing, malpractice or dangers at work.

‘Malpractice’ is not easily defined; however, it includes allegations of:

- fraud and / or financial irregularities;
- corruption and / or bribery;
- dishonesty;
- criminal activities;
- failure to comply with a legal obligation;
- a miscarriage of justice;
- creating or ignoring a serious risk to health, safety or the environment (negligence); and
- assisting in concealing information about any of the above.

A whistleblower is a person who raises a genuine concern relating to suspected malpractice within the School.

If staff have any genuine concerns related to suspected malpractice affecting any of the School’s activities (a whistleblowing concern), they should report it under this procedure.

If staff feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may report your concerns to other whistleblowing channels, such as:

- Protect, an independent whistleblowing charity
Helpline: 020 3117 2502,
Email: whistle@protect-advice.org.uk
Website: www.protect-advice.org.uk
- The NSPCC whistleblowing helpline
Tel: 0800 028 0285
Email: help@nspcc.org.uk
Website www.nspcc.org.uk
- The Modern Slavery helpline
Tel: 0800 0121 700
Website www.modernslaveryhelpline.org

CONFIDENTIALITY

Staff should feel able to voice whistleblowing concerns openly under this procedure. However, if they wish to raise a concern confidentially, the School will make every effort

to keep their identity secret. If it is necessary for anyone investigating the concern to know their identity, this will be discussed with them.

If there is evidence of criminal activity, the Police will be informed in all cases.

The School does not encourage staff to make disclosures anonymously as proper investigation may be more difficult or impossible if we cannot obtain further information. 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 discuss this with the Head or DFO and appropriate measures can then be taken to preserve confidentiality. Staff can also seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline (details above).

RAISING A WHISTLEBLOWING CONCERN

The School hopes that in most cases staff will be able to raise any concerns with their line manager. Concerns can be raised in person or in writing if preferred. It may be possible to agree a way of resolving concerns quickly and effectively. In some cases this may not be possible and the matter may need to be referred to the Head or DFO.

However, where the matter is more serious, or staff feel that their line manager has not addressed the concern, or they prefer not to raise it with them for any reason, staff are at liberty to raise a whistleblowing concern with the Head or DFO directly. If staff feel unable to approach the Head or DFO directly, then the Chair of Governors should be the first point of contact.

A meeting will be arranged with the whistleblower as soon as possible to discuss the concern. Staff may bring a colleague or trade union representative to any meetings under this procedure. Any companion must respect the confidentiality of the disclosure and any subsequent investigation. Staff may be required to attend additional meetings in order to provide further information as the concerns raised are investigated.

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. Staff will be kept informed of the progress of the investigation and its likely timescale. Whenever possible, and subject to third party rights, they will be informed of the resolution. However, sometimes the need for confidentiality may prevent the School giving specific details of the investigation or any disciplinary action taken as a result. Whistleblowers should treat any information about the investigation as confidential.

If staff are not satisfied that their concern is being properly dealt with, they have a right to raise it in confidence with the Governing Body. Alternatively, you can follow the external procedure below.

EXTERNAL PROCEDURES

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

However, if all internal procedures have been exhausted, staff have a right of access to an external person/body. This may include (depending on the subject matter of the disclosure) HMRC, the Audit Commission, the Health and Safety Executive and/or the Local Authority Designated Officer (where the disclosure relates to a child protection issue).

It will very rarely, if ever, be appropriate for whistleblowers to alert the media. It will never be appropriate for staff to approach a commercial body or the media with a malicious motivation or for personal gain. Where this is the case, the protection given under this procedure will be lost and under certain circumstances the School may consider this to be gross misconduct and disciplinary action may be taken.

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where staff may be entitled to raise a concern directly with an external body where they reasonably believe:

- that exceptionally serious circumstances justify it;
- that the School would conceal or destroy the relevant evidence;
- that they would be victimised by the School; or
- where the Secretary of State has ordered it.

The School strongly encourages staff to seek advice before reporting a concern to anyone externally. The independent whistleblowing charity, Protect (details above), operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concerns.

MAICIOUS ACCUSATIONS

False, malicious, vexatious or frivolous accusations will be dealt with under our Disciplinary Procedure.

PROTECTION FROM REPRISAL OR VICTIMISATION

It is understandable that staff are sometimes worried about possible repercussions as a result of raising a whistleblowing disclosure. 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.

Whistleblowers will not suffer a detriment or be disciplined for raising a genuine and legitimate concern, provided they do so in good faith and follow the whistleblowing procedures. If staff believe that they have suffered any such treatment, they should inform the Head or DFO immediately. If the matter is not remedied, staff may raise it formally using our Grievance Procedure.

Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct, will be subject to disciplinary action.