

Date Adopted: Spring 2025

Date to be reviewed: Spring 2027

Quadring Cowley and Brown's Primary School

Whistleblowing Policy

At Quadring Cowley & Brown's Primary School we strive 'to nurture and inspire all children to be well-rounded, confident and resilient individuals who love learning and are ready for life beyond school.'

Article 3- The best interests of the child must be top priority in all actions regarding children.

Statement of Intent

At Quadring Cowley and Brown's Primary School we aim to provide a safe, caring and friendly environment for all our children and young people to grow and develop and be educated in the best possible way.

We also aim to ensure that our school is a safe, caring and inclusive place for all staff (all employees of the school) , where they can feel confident to raise any concerns and know that these concerns will be acted upon with sensitivity and in a timely manner, to avoid any necessary stress in the workplace.

Purpose and Aims:

The purpose of this policy is to outline the procedure for employees who wish to notify any suspicions of another employee acting inappropriately and also how the school should respond.

The Governing Board expects its employees, and others involved in the work of the school, who have serious concerns about any aspect of the school's work to come forward and raise those concerns.

An employee may be the first person to realise that there could be something seriously wrong within the school. However, they may feel that speaking up would be disloyal to colleagues or to the school. They may also fear harassment or victimisation.

This policy aims to:

- enable and encourage the disclosure of information about malpractice internally
- reassure those making a disclosure that concerns will be taken seriously without victimisation, discrimination or disadvantage if they have reasonable belief that they have made any disclosure in good faith.
- provide information about how to raise concerns and explain how these will be dealt with
- encourage employees to feel confident in raising serious concerns, to question and act upon their concerns about practice
- provide them with a method of raising concerns and receive feedback on how this is being followed up
- ensure employees receive a response to their concerns in a timely manner and they are aware of how to pursue them if they are not satisfied
- reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have raised any concern in good faith.

Roles and Responsibilities

All employees and workers at the school have a responsibility for whistleblowing. The purpose of this policy and procedure is to make it clear that employees can raise concerns in confidence without fear of victimisation, subsequent discrimination or disadvantage. Employees are encouraged to raise serious concerns in the first instance within the school rather than overlooking a problem or 'blowing the whistle' outside, and it is preferred that the matter is raised when it is just a concern rather than waiting for proof.

QCB Whistleblowing Policy

The School and Local Authority operate within the legal requirements and regulations and expect all employees to co-operate in this by adhering to all laws, regulations, policies and procedures. Any employee becoming aware of another employee acting inappropriately is obliged and encouraged to report this activity.

The School and Local Authority are committed to the values of accountability, but the determined perpetrator may find a way round systems and procedures. It is therefore necessary for all managers and staff to be aware of what is required in the event of suspicions. This document sets out the procedure for employees who wish to notify any suspicions and also how the School should respond.

This policy applies to all employees and applies equally to those designated as casual, temporary, agency authorised volunteers or work experience, governors and those contractors working for the school or Local Authority on school or Local Authority premises, for example agency staff, builders, drivers. It also covers suppliers and those providing services under a contract with the LA.

The grievance procedure is in place to enable employees to lodge a concern relating to their employment.

What is Whistleblowing?

The Whistle Blowing Policy is intended to cover major concerns that fall outside the scope of other procedures.

Whistleblowing, also known as confidential reporting or protected disclosure is the disclosure or communication of information about possible wrongdoing or malpractice. Qualifying disclosures are disclosures of information where there is a reasonable belief (and it is in the public interest) that one or more of the following matters is either happening, has taken place, or is likely to happen in the future:

- a criminal offense, including:
 - fraud
 - bribery
 - corruption
 - theft
 - money laundering within the organisation
- health and safety risks or violations that could harm employees, customers, or the public
- environmental damage or violations of environmental regulations
- discrimination or harassment in the workplace based on factors such as:
 - race
 - gender
 - age
 - disability
 - sexual orientation
- misuse of public funds or resources
- failure to comply with legal obligations or regulations
- concealment of information about a serious risk to public health or safety

QCB Whistleblowing Policy

- any other serious wrongdoing or misconduct that is in the public interest to disclose
- The breach of a legal obligation - including for example bribery, financial fraud or mismanagement, negligence, breach of our internal policies and procedures, conduct likely to damage our reputation (including the use of social media), unauthorised disclosure of confidential information, other unethical behaviour
- Disclosures relating to a miscarriage of justice
- A danger to the health and safety of any individual - including Child Protection and Safeguarding concerns
- Deliberate attempt to conceal any of the above.

This list is not exhaustive and one should consider the school's safeguarding duties with regards to any on site personnel.

Procedure for making a disclosure

The following important principles are contained within this policy:

- It contains the provisions that are required from the Public Interest Disclosure Act 1998
- The School and Local Authority are committed to tackling malpractice, and employees should know that any matter regarding malpractice and other illegal acts will be dealt with seriously
- A trade union or employee representative or other representative of their choice may accompany any employee involving this procedure
- If a matter results in any disciplinary action, the Disciplinary Procedure will apply

Quadring Cowley and Brown's Primary School has in place policies and procedures to regulate the conduct of staff, to handle grievances and complaints and to safeguard children. The school and Governing Board expect all staff to raise concerns through the relevant procedure first where this is appropriate.

The Whistleblowing Policy encourages and enables employees to voice their concerns without fear of victimisation, subsequent discrimination or disadvantage.

Employees are often the first to see or suspect something that may be seriously wrong within the school. However they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the authority. They may also fear harassment or victimisation.

The Governing Board/Local Authority will not tolerate any harassment or victimisation and will take appropriate action to protect employees when a concern is raised in good faith. Where there is a reasonable belief (and it is in the public interest) that wrongdoing is happening, has taken place or is likely to happen in the future, then the issue should be reported as soon as possible at the most relevant level within the organisation which will usually be a line manager in the first instance.

However, it is recognised that wrongdoing can take place at any level of an organisation and therefore reporting of the wrongdoing should be to a level above where you suspect the

wrongdoing to have taken place. If you do not feel able to discuss the matter with your Line Manager then you should approach your Headteacher or Chair of Governors.

Maintaining Good Practice

Quadring Cowley and Brown's Primary School and the Local Authority are committed to the highest possible standards of honesty, integrity and accountability, and we expect all staff to maintain these standards. A culture of openness and accountability is essential in order to prevent situations occurring that lead to Whistleblowing taking place, and to address them when they do occur.

In line with that commitment we encourage employees, and others that we deal with, who have serious concerns about any aspect of the school or Local Authority's work to come forward and voice those concerns. It is recognised that certain cases will have to proceed on a confidential basis.

Expected standards of conduct and practice derive from a variety of sources including:

- Job descriptions
- Policies, Procedures and Guidelines
- Professional standards
- Legal requirements and guidelines
- Inspection standards and reports
- Code of Conduct

The above list is not exhaustive, but indicates the framework within which the School delivers its services. Employees should ensure that they are aware of the standards expected of them. If they are in any doubt they should discuss this with their line manager or the Headteacher.

The system for maintaining good standards is founded on proper induction, supervision and appraisal, team meetings and briefing sessions, training and development and, where necessary, the positive use of the Capability and Disciplinary Procedures

The School recognises that the decision to report a concern can be a difficult one to make. If what Employees are saying is true, they should have nothing to fear because they will be doing their duty to their employer and those who are providing a service.

The School will not tolerate any form of harassment or victimisation and will take appropriate action to protect employees when they raise a concern in good faith.

Any investigation into allegations of potential malpractice will not influence or be influenced by any Disciplinary or redundancy procedures that already affect them.

Promoting Good Practice

There are several ways of promoting good practice as follows:

- Always be vigilant and alert, having the understanding that 'it could happen here' as in all safeguarding good practice

QCB Whistleblowing Policy

- We should lead by example. No one is perfect but it is hard to criticise others if our own practice is not of a high standard
- We should know what the School's policies and procedures expect of us and inform others who do not
- We should take the initiative to propose new procedures and amend old procedures
- Where employees are in a caring role they should ask for procedures that make it "normal" to express concern about "care" standards
- We should ask questions. If a colleague does something that we consider to be inappropriate, we should question it. There is no need for aggression but by asking why something is done in a certain way and how it will improve the service will ensure standards are maintained
- We should keep up to date, read professional journals, attend seminars/professional development meetings (where appropriate) join discussion groups or joint professional groups
- We need to talk to fellow professionals to learn from best practice
- Cooperate as fully as possible with any investigation into work practices arising from complaints from a service user and share any knowledge or concerns
- Know what is happening in the school, read memoranda and newsletters
- Do not wait until something becomes a major problem. Act early, if we do not we may be condoning bad working practices.

Concerns

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal employees' identities if that is their wish. However, this cannot be guaranteed, if the matter is considered by an external body, outside of the School's control, e.g. legal proceedings.

How to raise a concern

When an employee feels concerned about bad practice he or she will need to identify the issues carefully.

All employees at Quadring Primary School have been given a copy of Appendix 1 - Whistleblowing procedure flow chart (which is also displayed in the school office) as a guide for whistleblowing.

An employee must be clear about the standards against which he or she is judging practice:

- Is it illegal?
- Does it contravene professional codes of practice?
- Is it against government guidelines?
- Is it against the LAs guidelines?
- Is it about one individual's behaviour or is it about general working practices?
- Does it contradict what the employee has been taught?
- Has the employee witnessed the incident? If so he or she should write it down
- Did anyone else witness the incident at the same time? If so they should write it down.

Who an employee should raise concerns with, depends upon the seriousness and sensitivity of the issue involved and who is suspected of the malpractice. For example, there may be exceptional

QCB Whistleblowing Policy

occasions when they are concerned about poor, or bad care practice by colleagues at work or where they are aware of a colleague acting in a way that is illegal, immoral, or unethical.

As a first step, an employee should normally raise concerns with their immediate line manager. However, if their concern is about their manager they should contact their Head Teacher. The matter should be raised internally in the first instance 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.

If an employee's concern is about the Head teacher, he or she should contact the Chair of Governors.

The details of the Chair of Governors can be accessed through the main school office.

If you believe officers of the Local Authority more generally are involved, you should approach the Chief Executive or in case of a financial issue, Head of Internal Audit

Once an employee is certain that bad practice exists the following action should be considered:

- Concerns may be raised verbally or in writing. Employees who wish to make a written report should give the background and history of the concern and the reason why they are particularly concerned about the situation. The earlier concerns are expressed the easier it is to take action
- If the employee wishes he or she may ask for a private confidential meeting with the person to whom he or she wishes to make the complaint
- An employee may take another person with them as a witness or for support
- The employee should take to the meeting - if possible - dated and signed written supporting statements from anyone who can confirm the allegations.
- When making the complaint verbally, the employee should write down any relevant information and date it. Keep copies of all correspondence and relevant information.
- The employee should ask the person to whom he or she is making the complaint what the next steps will be and if anything more is expected of them.
- Ask to be informed of the outcome of the investigation into the complaint.

Although employees are not expected to prove beyond doubt the truth of an allegation, they will need to demonstrate to the person contacted that there are reasonable grounds for their concern.

For further advice and/or guidance, please contact Human Resources at the Local Authority.

An employee may wish to consider discussing their concern with a colleague first and they may find it easier to raise the matter if there are two people who have had the same experience or concerns.

Employees may ask their trade union or professional association representative to advise them, or be present during any meetings or interviews in connection with the concerns they have raised.

QCB Whistleblowing Policy

Employees will not be victimised, disciplined or disadvantaged in any way for raising genuine concerns.

All employees have legal protection under the Public Interest Disclosure Act 1998 <https://www.legislation.gov.uk/ukpga/1998/23/contents> . This Act protects employees from victimisation by their employer as a result of raising genuine concerns both inside or outside their organisation. However, this does not apply where allegations are found to be malicious or deliberately false. Such behaviour will be dealt with under the Disciplinary Procedure available from the school as set out by the GTC, details of which can be found at www.gtce.org.uk/regulation.

Employees also have the right to raise matters of concern under the Grievance Procedure available from the school.

Anonymous Allegations

You should put your name to your disclosure whenever possible and this policy encourages employees to put their name to any allegation whenever possible. It is helpful to have your name in case further information is required. Concerns expressed anonymously are much less powerful but will still be considered at the discretion of the school Management or School Governing Board.

In exercising its discretion the factors to be taken into account would include

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources.

Employee Action - "If you see something - say something"

You may raise your concern either verbally or in writing. The earlier you express the concern, the easier it is to take action.

You should provide:

- details of your concerns, including the nature, dates and location of any relevant incidents;
- reasons why you feel concerned about the situation.

Untrue Disclosures

If you make a disclosure in good faith, but it is not confirmed by the investigation, no action will be taken against you. If however, your allegation is frivolous, malicious or for personal gain, you may be subject to disciplinary action.

How the School will respond

The individual manager hearing the concern is encouraged to take advice from Human Resources at the Local Authority.

Do not forget that testing out your concerns is not the same as either accepting or rejecting them.

Where appropriate, the matters raised may:

QCB Whistleblowing Policy

- Be investigated by management, internal audit, or in conjunction with Human Resources through the disciplinary procedure,
- Be referred to the police
- Be referred to the external auditor
- Form the subject of an independent inquiry.

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and if so what form it should take. The overriding principle the School will have in mind is the public interest. Concerns or allegations, which fall within the scope of specific procedures (for example, child protection or discrimination issues), will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.

Within ten working days of a concern being raised, the manager hearing the concern will write to the employee, and:

- Acknowledge the concern has been received
- Indicate how the matter will be dealt with and who will be involved
- Where possible, give an estimate of how long it will take to provide a response
- Tell the employee whether any initial enquiries have been made
- Check whether he or she needs any personal support
- Tell the employee whether further investigations will take place and if not why not.

The amount of contact between you and the person considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the School Management or School Governing Board will seek further information from the employee, as part of the investigation process.

The School Management or School Governing Body will take steps to minimise any difficulties which employees may experience as a result of raising any concerns. For instance, if they are required to give evidence in criminal or disciplinary proceedings, the School will arrange for them to receive support.

The School accepts that individuals need to be assured that the matter has been addressed. Thus, subject to legal constraints and the bounds of confidentiality, we will inform them of the outcome of any investigation, and the action that is to be taken against those whose action caused the concern. Also if appropriate, what changes are to be made to monitor procedures to ensure that a similar concern is not raised in the future.

Responsible Officer

The Chief Executive of the Local Authority has the overall responsibility for the maintenance and Operation of the Whistle Blowing policy in respect of concerns raised formally outside the management of the school. The LA maintain a record of concerns raised and the outcome, but in a form which does not endanger your confidentiality and reports as necessary to the Council. In

respect of concerns raised internally within the school the Headteacher will maintain a record of concerns raised and the outcome and will report as necessary to the Governing Board.

How matters can be taken further

If the employee is not satisfied with the outcome, they may take the matter to the Chair of Governors if they have not already been involved. Within ten days the Chair of Governors will write to the employee to acknowledge the concern has been received and indicate the steps that will be taken. The Chair of Governors may choose to set up a small group of governors to investigate. The Chair of Governors will then inform the employee of the outcome on the same basis as above.

This policy is intended to provide employees with a way to raise concerns within the School. If they are not satisfied and they feel it is right to take the matter outside the School, the employee may also raise the matter with the Local Authority's Chief Executive.

If the employee is dissatisfied with the response from the School and Local Authority and subject to the concern being a matter covered by the Act he/she can raise the matter, as appropriate with one of the following:

- Ofsted (whistleblowing helpline): 0300 1233155 or whistleblowing@ofsted.gov.uk
- Information Commissioner: 0303 123 1113
- National Audit Office: 020 7798 7999
- Environment Agency: 03708506506
- Health and Safety Executive: 03000031747
- An individual's local councillor, (if he or she lives within the Council's boundary)
- The external auditor
- The Audit Commission
- The individual's trade union
- The local citizens advice bureau
- Relevant professional bodies or regulatory organisations
- A voluntary organisation
- Your solicitor
- The police
- "Public Concern at Work", is a voluntary organisation who offer confidential legal advice to employees of any organisation. <https://www.pcaw.org.uk>

You may also choose to raise the matter directly with the Local Authority Designated Officer, if the matter concerns a potential safeguarding/child abuse issue. Please remember that in cases of abuse or neglect of a child, if you fail to report a concern and it later comes to light that you were aware of information which could have protected a child, it is possible that disciplinary action could be taken against you under Section 157 of the Education Act 2002.

If employees take their concerns outside of the School, this policy does not apply. They should take advice about their rights and responsibilities. Employees should also make sure that as far as possible the matter is raised without personal information relating to other employees being disclosed.

QCB Whistleblowing Policy

Any employee who unreasonably and without justification raises such issues on a wider basis, such as with the press, without following the steps and advice in this procedure may be liable to disciplinary action.

Existing good practice within Quadring Cowley & Brown's Primary 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 issues can be raised confidentially internally and if necessary outside the management structure of the school. This document is a public commitment that concerns are taken seriously and will be actioned.

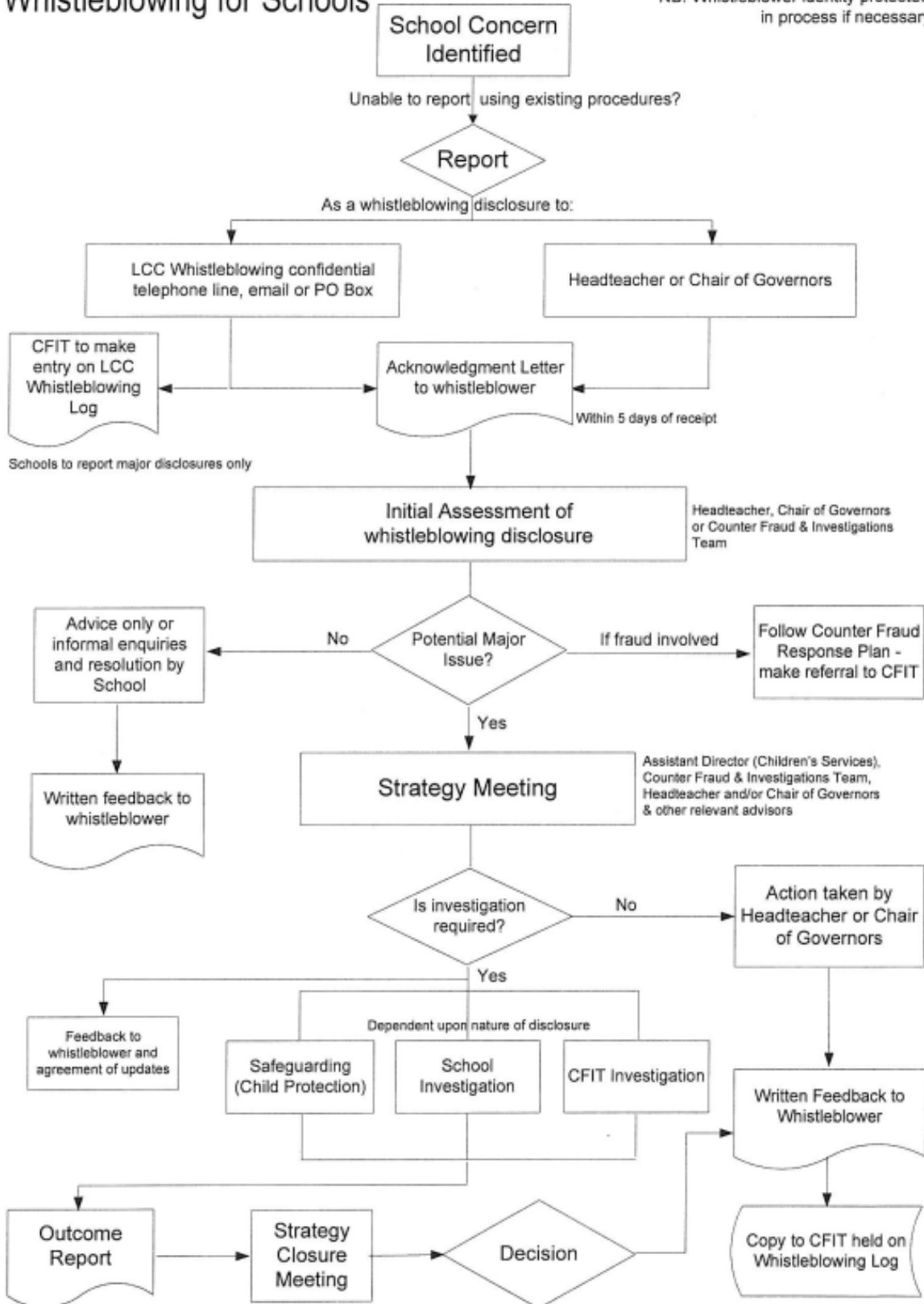
Monitoring and Review

This policy is monitored by the Governing Board, and will be reviewed biannually or as required in light of updated legislation and guidance.

Appendix 1: Whistleblowing for Schools Flowchart <https://www.lincolnshire.gov.uk/directory-record/61723/whistleblowing-policy>

Whistleblowing for Schools

NB. Whistleblower identity protected in process if necessary



LCC Whistleblowing Log held by Counter Fraud & Investigations Team (CFIT)