



Whistleblowing Policy

Person responsible	Head & DFO
Last review	September 2023
Frequency of Review	Annual
Date of last review by Governors	November 2023
Date of next review by Governors	November 2024

Introduction

The Bute House Whistleblowing policy has a key role to play in the safeguarding and welfare of the children in our care. The School is committed to conducting its business with honesty and integrity, and we expect all staff to maintain high standards in accordance with the Code of Conduct. All organisations face the risk of behaviour that warrants a whistleblowing policy [i.e. 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.

This policy covers all employees, officers, governors, consultants, contractors, volunteers, work placement students, casual workers and agency workers (**Staff**).

The School recognises that this policy is essential for its culture and ethos both of inclusivity and for the welfare of its staff and pupils and will therefore ensure that new staff are made aware of it as part of their induction to the School and for existing staff in training as part of the School's safeguarding procedures. A copy will be communicated to all staff so that they understand what and how concerns are dealt with to enable them to easily raise concerns and be supported in doing so.

All staff will be made aware of this policy and our codes of conduct by the Designated Safeguarding Lead and be required to read it as part of the Safeguarding procedures in the School. This policy is also linked to our Safeguarding (Child Protection) Policy, Safer Recruitment and the Staff Behaviour (Code of Conduct) Policy.

This policy has a key role to play in the safeguarding and welfare of the children in our care and forms part of our safeguarding procedures. The School is committed to safeguarding and promoting the welfare of its pupils and encourages an open and supportive culture.

Aims

This policy is intended to assist individuals who believe they have discovered malpractice or serious wrongdoing at work. This will ensure that disclosures are taken seriously and dealt with appropriately.

This policy is intended to cover genuine concerns that fall outside the scope of other procedures. This procedure should not be used where staff have a complaint relating to their personal circumstances in the workplace. The grievance procedure [contained in the Employment Manual] should be used (as appropriate) in such cases.

This policy is designed to help individuals feel able to raise concerns about suspected wrong-doing or dangers at work, to include potential failures in the School's safeguarding regime.

A whistleblower is a person who raises a genuine concern relating to any of Reasons for Whistleblowing listed below. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities and such disclosure is in the public interest (a whistleblowing concern) you should report it under this policy.

The policy aims to:

- Give confidence to staff about raising concerns about suspected wrongdoing or dangers at work so that she/he is encouraged to act on those concerns.
- Provide members of staff with guidance on how to raise concerns.

- Ensure that members of staff receive an appropriate response to the concerns they have raised and feedback on any action taken.
- Offer assurance that members of staff are protected from reprisals or victimization for genuine whistleblowing concerns raised.

Reasons For Whistleblowing

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- Criminal and unlawful conduct
- Unethical conduct in the workplace
- Safeguarding concerns
- Behaviour which amounts to improper conduct including failure to comply with legal obligations or regulatory requirements
- Financial fraud or mismanagement or corruption
- Miscarriage of justice
- Health and safety risks including risks to the public as well as the risks to pupils and staff
- Environmental or property damage
- Action that has caused or is likely to cause physical danger to any person or risk serious damage to school property
- Bribery
- Financial irregularity
- Breaches of financial regulations or policies
- Actions that negatively affect the welfare of children
- Abuse of authority
- The deliberate concealment or attempt to cover up any of the above

If you are uncertain whether something is within the scope of this policy you should seek advice from the Head, Designated Safeguarding Lead, Protect, the NSPCC whistleblowing helpline or the Modern Slavery helpline.

Principles of Reporting Concerns

- Every member of staff has a duty to protect children from harm.
- Each individual has a responsibility for raising concerns about unacceptable practice or behaviour. Although we accept this can be difficult this is particularly important where the welfare of a child may be at risk.
- Adults working in a school are often the first to realise that the behaviour of someone is causing, or is likely to cause, harm to a child.
- To prevent the problem worsening or escalating
- To protect or reduce risks to others
- To prevent becoming implicated yourself i.e. that you have colluded or ignored poor practice
- We recognize that reporting a concern can be difficult.

Mistaken or Untrue Concerns

You may be worried that you have insufficient evidence to raise a concern and that there may be adverse repercussions for your career and you may suffer harassment or victimization. You may also worry that speaking out would be disloyal to colleagues and that it is easier to ignore your suspicions. We appreciate these concerns and this policy protects staff from reprisals and we will not tolerate bullying or harassment of our staff.

Provided that this procedure is used appropriately and correctly, no action will be taken against any member of staff who raises a genuine concern who proves to be mistaken.

The protection given to you by this procedure may be lost if concerns are raised in a malicious manner or for personal gain. The School may consider this to be gross misconduct and disciplinary action may be taken against you

Victimization of a worker for making a genuine whistleblowing disclosure will be a disciplinary offence as will misusing this policy to make allegations.

The School has a culture of openness and support and will resolve any concerns as swiftly and sensitively as it can and in a proportionate way to reach a successful resolution. The School has an ethos of reflective practice and one where everyone working at Bute is valued and welcomed so we encourage anyone with concerns to raise them without fear.

Guidance on Raising Concerns

- Try to pinpoint exactly what practice is concerning you and why. Ideally these should be put in writing for the avoidance of doubt, but it can be a verbal report if you prefer. If it is verbal notes will be taken and read back to confirm accuracy. You do not have to provide proof of your concerns, but you should demonstrate sufficient cause for concern.
- All concerns will be treated promptly and in confidence and as far as possible your identity will be protected, however, we cannot guarantee absolute confidentiality. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

- The School will also investigate anonymous allegations, but you are strongly encouraged to put your name to any allegation, as those expressed anonymously are much less powerful. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

Reporting Procedures

Stage One

You should disclose the suspected wrongdoing first to your Line Manager. In the event that your Line Manager is involved in the suspected wrongdoing, you should proceed directly to Stage Two of this procedure.

You can expect a response detailing to whom the disclosure has been notified or any action taken within five working days of your Line Manager becoming aware of the disclosure.

Stage two

If no response is forthcoming after five working days from your Line Manager, if you are not satisfied with the way in which your concern has been handled or if your Line Manager is involved in the suspected wrongdoing, you should notify the Head, as appropriate.

You can expect a response detailing any action taken within five working days of the Head becoming aware of the disclosure.

Stage three

If no such response is forthcoming after five working days from the Head, if you are not satisfied with the way in which your concern has been handled or if the Head is involved in the suspected wrongdoing you should inform the Chair of Governors of the disclosure via the Clerk to the Governors: Julia.Watkiss@butehouse.co.uk

You may, if you so wish, be accompanied by a work colleague who is not involved in the area of work to which the concern relates and who also could not be called as a witness.

If you are already the subject of a disciplinary or grievance procedure these proceedings will not necessarily be halted by the whistleblowing. However, it must be reviewed to see if there is any link between them and then conclude the appropriate action to take.

Reporting Procedures when There is a Safeguarding Concern

Nothing within this policy is intended to prevent staff from complying with their statutory obligations in accordance with Keeping children safe in education (DfE, September 2023). In particular:

Safeguarding / child protection policy: If you have any concerns about a pupil's welfare, action should be taken immediately (even if they are low level concerns). You should report the concern to the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead. See the School's child protection and safeguarding policy and procedures for full information about what to do if you have a concern about a pupil, including what to do if the Designated Safeguarding Lead is not available.

Safeguarding - member of staff: You must raise any concerns about another staff member (even if they are low-level concerns) in accordance with the School's Safeguarding or Low-Level Concerns Policies.

Whistleblowing policy: You should follow this procedure to raise concerns about poor or unsafe practices at the School or potential failures by the School or staff to properly fulfil its safeguarding responsibilities.

The School is committed to the prevention of modern slavery. If you have any concerns or queries relating to modern slavery and human trafficking, please contact the DSL. Identified instances of modern slavery should be immediately notified to the police. If you think you have identified an instance of modern slavery, or if you consider that you may be a victim of modern slavery you may contact the Modern Slavery helpline on 0800 0121 700.

Relevant External Reporting

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. The law recognises, as does this policy particularly in relation to safeguarding, that in some circumstances it may be appropriate for you to report your concerns to a relevant outside body.

Guidance and Advice

Staff are strongly encouraged to seek advice before reporting a concern to anyone external. In most cases you should not find it necessary to alert anyone external but before you do, as well as considering the internal help and support available which is identified above, please seek external advice from:

- **Protect:** If you have any concerns about disclosing a suspected wrongdoing the independent whistleblowing charity, Protect, operates a confidential helpline. Staff can call 020 3117 2520 for advice.
- **NSPCC:** The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0808 800 5000 (12.00 pm to 4.00 pm Monday to Friday) or email help@nspcc.org.uk
- **The Modern Slavery helpline:** The Modern Slavery helpline is available for staff who do not feel able to raise concerns about modern slavery internally. Staff can call on 0800 0121 700.

The media:

You should under no circumstances approach a commercial body or the media with details of the suspected wrongdoing. If you approach any such body and / or where your concern is disclosed in a malicious manner or for personal gain, the protection given to you by this procedure may be lost. Additionally, the School may consider this to be gross misconduct and disciplinary action may be taken against you.

Monitoring and Review

The Head will inform the Chair of Governors of any complaints received and the action taken to resolve it. The Governing Body will review this policy annually.

If you have any queries about this procedure, you should contact the Head.