



**Whistle-blowing Policy**

**Effective Date: January 2014**

**Reviewed: January 2016, April 2018, November 2020  
April 2021**

**Next Review Date: April 2023**

**Review Committee: Resources**

<b>Adopted</b>		
<b>Signature</b>		<b>Headteacher</b>
<b>Signature</b>		<b>Chair of Resources</b>
<b>Date</b>		

## Introduction

The staff and governors of Winchcombe School seek to run all aspects of school business and activity with full regard for high standards of conduct and integrity. Should members of school staff, parents, governors or the school community at large become aware of activities which give cause for concern, Winchcombe School has established the following whistleblowing policy, or code of practice, to allow concerns to be raised confidentially and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion.

Throughout this policy, the term *whistle-blower* denotes the person raising the concern or making the complaint. The term was coined by Lord Nolan in the late 1990s when he recommended to the Committee on Standards in Public Life that local authorities etc should adopt whistleblowing policies as a component of good governance.

All the School's employees are covered by the Public Interest Disclosure Act 1998, which states that part of its purpose is to "protect individuals who make certain disclosures in the public interest; to allow such individuals to bring action in respect of victimisation and for connected purposes." Personal grievances (e.g., reports of bullying, harassment and discrimination are not covered by whistleblowing law, and should be reported under the School's Grievance Policy.

Winchcombe School is committed to tackling fraud and other forms of malpractice and treats these issues seriously. **(Please also refer to separate Anti-Fraud and Corruption Act Policy and the Anti-Bribery Policy)**. The School recognises that some concerns may be extremely sensitive and has therefore developed a system which allows for the confidential raising of concerns within the school environment but also has recourse to an external party outside the management structure of the school.

Winchcombe School is committed to creating a climate of trust and openness so that a person who has a genuine concern or suspicion can raise the matter with full confidence that the matter will be appropriately considered and resolved.

### When might the whistleblowing policy apply?

The type of activity or behaviour which Winchcombe School considers should be dealt with under this policy includes:

- manipulation of accounting records and finances
- inappropriate use of school assets or funds
- inappropriate use of computers/internet
- decision-making for personal gain
- any criminal activity
- abuse of position
- fraud and deceit
- serious breaches of school procedures which may advantage a particular party (for example

tampering with tender documentation, failure to register a personal interest)

### **What action should the whistle-blower take?**

Winchcombe School encourages the *whistle-blower* to raise the matter 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 explain their behaviour or activity.

Winchcombe School has designated specific individuals to deal with such matters and the *whistle-blower* is invited to decide which of those individuals would be the most appropriate person to deal with the matter.

These are the Headteacher and Chair of Governors (see Appendix)

The *whistle-blower* may prefer to raise the matter in person, by telephone or in written form marked private and confidential and addressed to one of the above-named individuals. All matters will be treated in strict confidence and anonymity will be respected wherever possible.

If you are unsure about whether to raise any issue under this policy, you can seek advice from any of the unions or from the Employee Assistance Programme Care First freephone helpline which is 0800 174319.

Alternatively, if the *whistle-blower* considers the matter too serious or sensitive to raise within the internal environment of the school, then please refer to the Gov.uk website at <https://www.gov.uk/complain-about-school>

The charity Protect (formerly Public Concern at Work) provides free confidential advice to workers who have concerns about wrongdoing in the workplace. Contact Tel: 020 7404 6609 or visit <https://protect-advice.org.uk/>.

### **How will the matter be progressed?**

The individual(s) in receipt of the information or allegation [the investigating officer(s)] will carry out a preliminary investigation. This will seek to establish the facts of the matter and assess whether the concern has foundation and can be resolved internally. The initial assessment may identify the need to involve third parties to provide further information, advice or assistance, for example involvement of other members of school staff, the school's external auditors, legal or personnel advisors, the police, the Department for Education.

Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer(s), possibly in conjunction with the governing body, will consider how best to report the findings and what corrective action needs to be taken. This may include some form of disciplinary action or third-party referral such as the police.

The *whistle-blower* will be informed of the results of the investigation and the action taken to address the matter. Depending on the nature of the concern or allegation and whether or not it has been substantiated, the matter will be reported to the governing body and the Education & Skills Funding Agency.

If the *whistle-blower* is dissatisfied with the conduct of the investigation or resolution of the matter or has genuine concerns that the matters has not been handled appropriately, the

concerns should be raised with the investigating officer(s), the governing body and/or direct to the Education & Skills Funding Agency.

### **Respecting confidentiality**

Wherever possible Winchcombe School seeks to respect the confidentiality and anonymity of the *whistle-blower* and will as far as possible protect him/her from reprisals.

Winchcombe School will not tolerate any attempt to victimise the *whistle-blower* or attempts to prevent concerns being raised and will consider any necessary disciplinary or corrective action appropriate to the circumstances.

### **Raising unfounded malicious concerns**

Individuals are encouraged to come forward in good faith with genuine concerns with the knowledge they will be taken seriously. If individuals raise malicious unfounded concerns or attempts to make mischief, this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances.

### **Conclusion**

Existing good practice within Winchcombe 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.

## APPENDIX

Headteacher: Mr Jonathan Templeton, Headteacher, Winchcombe School,  
Greet Road, Winchcombe, Glos, GL54 5LB  
Tel (01242) 602233

Chair of Governors: Mrs Sue Proctor  
c/o Winchcombe School,  
Greet Road, Winchcombe, Glos, GL54 5LB  
Tel (01242) 602233

Care First 0800174319