

Royal Alexandra & Albert School



Whistleblowing Policy

The Governors, Foundation and staff at The Royal Alexandra and Albert School are committed to providing a safe and happy learning environment, promoting equality and diversity and ensuring the well-being of all members of the community. It is their clear intention to promote good behaviour and to exercise their responsibilities in ensuring the safeguarding and welfare of all pupils and staff within the community.

Applies to	All staff
Committee responsible	Staff Matters Committee
Governing Board approval required	Yes
Accountable Executive	Bursar
Status & Review Cycle	Non-Statutory, 3 yearly
Last approval	February 2024

Introduction & Purpose of Policy

Royal Alexandra & Albert School is committed to the highest possible standards of honesty, openness and accountability. It seeks to conduct its affairs in a responsible manner, to ensure that all its activities are open and effectively managed, and that the School and the Foundation's integrity and the principles of public interest disclosure are sustained.

In line with that commitment, we encourage employees, those working on behalf of the School/Foundation and others that we deal with, who have serious concerns about any aspect of the School/Foundation's work to come forward and voice those concerns as follows:

- a) With their immediate manager and/or the Headteacher. Where any member of staff decides to report a serious incident, whether anonymous or not, this will be treated as a 'protected, internal disclosure' i.e. there will be no adverse repercussions for the member of staff.
- b) Through an external, independent and confidential service provided via the Navex Global helpline. Freephone: 0800 069 8180

Purpose of the policy

Employees are often the first to realise that there may be something seriously wrong within the School/Foundation. However, staff may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the School/Foundation. They may also fear harassment or victimisation. Staff members need to realise that they not only have the right but also a duty to report any improper actions or omissions, particularly where the welfare of young people may be at risk.

Royal Alexandra & Albert School also recognises and appreciates that employees who raise concerns regarding malpractice or wrongdoing are an asset to the School/Foundation, and not a threat. This policy makes it clear that they can raise concerns without fear of victimisation, subsequent discrimination or disadvantage. The whistleblowing policy is intended to encourage and enable staff to raise serious concerns within the School/Foundation.

This policy aims to:

- Encourage staff to feel confident in raising serious concerns and to question and act upon concerns about practice;
- Provide avenues to raise those concerns and receive feedback on any action taken;
- Ensure that staff receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied;
- Reassure staff that they will be protected from possible reprisals or victimisation if they have made any disclosure in good faith.

Who is covered by the policy?

The policy applies to all school and foundation employees, whether full-time or part-time, permanent or temporary, and those carrying out work for the School/Foundation, for example, governors, volunteers, agency workers, contractors or consultants. To facilitate the reading of this policy, the terms 'staff' or 'member(s) of staff' have been used, with the intention to cover all individuals mentioned above.

Scope of the Policy

The whistleblowing policy is intended to cover serious concerns that may fall outside the scope of other procedures, in accordance with the Public Interest Disclosure Act 1998. These include:

- Conduct which is an offence or a breach of law
- Failure to comply with a legal obligation
- Disclosures related to miscarriages of justice
- Health and safety risks, including risks to the public or pupils as well as other staff
- Damage to the environment
- Information relating to the above issues that has been, or is likely to be, deliberately concealed.

Examples of the above categories are likely to include:

- The unauthorised use or misuse of public funds
- Possible fraud and corruption
- Sexual, physical or psychological abuse of pupils at the school

Therefore, any serious concerns that a member of staff has about any aspect of the School/Foundation's service provision or the conduct of staff or others connected with the School/Foundation can be reported under this whistleblowing policy where that member of staff has a reasonable belief in the validity of those concerns and they relate to one of the specified areas set out above.

A wrongdoing disclosed under the policy should be in the public interest, this means it affects others. There are existing procedures in place to enable employees to lodge concerns relating to their own employment.

Safeguarding Against Harassment or Victimisation

The School/Foundation are committed to good practice and high standards and want to be supportive of employees. It is recognised that the decision to report a concern can be a difficult one to make. If a member of staff has a reasonable belief that what they are saying is true they have nothing to fear because they will be doing their duty to their employer and pupils of the School.

The School/Foundation will take appropriate action to protect staff when they raise a concern, by supporting the member of staff and consider action under the appropriate procedure against the person or persons responsible for the reported acts, provided the member of staff:

- Discloses the information in good faith
- Believes the concern to be true
- Does not act maliciously or make false allegations
- Does not seek any personal gain, and
- Provided the allegations relate to one of the categories covered by the scope of the policy and referred to above

There are national guidelines to help you as a whistleblower. See the government guidance: <https://www.gov.uk/whistleblowing>.

There is also a whistleblowing charity Protect that has a helpline on 0203 117 2520. This helpline offers independent and confidential advice to those who are unsure whether, or how, to raise a public interest concern.

Unsubstantiated Allegations

If a member of staff makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, an allegation is made frivolously, maliciously or for personal gain, disciplinary action may be taken.

Confidentiality

All concerns will be treated in confidence but, at the appropriate time, the whistle blower may be asked to come forward as a witness and this will be discussed with them .

Anonymous Allegations

This policy encourages staff to put their name to their allegation wherever possible.

Where a concern is raised via the external confidential NAVEX Global service , the whistleblower can choose to provide NAVEX Global with their name and contact details, which will not be passed to the School/Foundation without express permission from the individual. This enables NAVEX Global to ask for further information on the concern, if required.

The School/Foundation will take all concerns raised seriously. When carrying out an initial review of a concern, the School/Foundation will take into account the following factors:

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

How to Raise a Concern

There are two ways in which to raise a concern:

Staff may raise concerns with their immediate line manager, the Headteacher, the Chair of the Governing Board/Board of Management of the School's Designated Safeguarding Lead (DSL) where this is appropriate to the nature of the concern.

If the concerns relate to allegations that a member of staff or volunteer may have harmed a child or behaved in a way that indicates he/she poses a risk of harm to children, the allegation should be raised with the Headteacher in the first instance, in accordance with the school's child protection and safeguarding policy. Where the allegations involve the Headteacher, the member of staff should raise the matter with the Chair of the Governing Board or, should the whistleblower feel the need to involve a person external to the school, his/her trade union/professional association or the Area Schools Officer (ASO), who will refer allegations to other officers of the Surrey County Council as relevant to the nature of the concerns.

Concerns may be raised verbally or in writing. Staff who wish to make a written report are asked to provide the background and history of the concern (including relevant dates) and the reason why they are particularly concerned about the situation.

The earlier the concern is expressed, the easier it is to take action. In order to assist with the investigation, staff should provide as much detail and supporting evidence as possible. Staff are not expected to prove that an allegation is true, only to have sufficient grounds for concern.

The whistleblower may invite a recognised Trade Union representative or a work colleague to be present during any meetings or interview in connection with the concerns raised.

While concerns will usually be raised internally, the School/Foundation recognises that some staff may feel unable to do this and that they may wish to contact an independent, external organisation, such as NAVEX Global/ , in order to report something.

NAVEX Global is an external and independent organisation, which specialises in providing a confidential hotline service for whistleblowing and can be contacted any time, night or day, in complete confidence with any relevant concerns. The call will not be traced or monitored. Freephone 0800 069 8180.

How the School/Foundation Will Respond

The School/Foundation will investigate and respond to all concerns raised by employees or service users through any channels including Navex Global.

While it is not essential that the concerns be provided in writing, the person receiving the concern will, ensure that a written account of it is made. This will help with the subsequent investigation by facilitating clear record-keeping.

When a concern is raised directly with a line manager, they should undertake the following actions:

- Take the concern seriously
- Consider the concerns fully and objectively
- Recognise that raising a concern can be a difficult experience for employees
- Ensure confidentiality
- Refer to a manager of appropriate seniority, to agree the level at which the concern will be investigated and identify who will take responsibility for co-ordinating the enquiry.

Staff members who are under investigation will not be involved in the investigation process. In schools, this will include Governing Board members.

Initial Enquiry

In order to protect the individuals involved and those accused of misdeed 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 is that of the public interest. If urgent action is required, for example if the welfare of pupils may be at risk, this action will be taken before any investigation is conducted. The purpose of the initial inquiry is to ascertain if the conduct or behaviour involves a member of staff, so that further enquiries and investigation can be progressed accordingly

Preliminary review

A preliminary review establishes the need to carry out an investigation. Further to the results of this enquiry and preliminary review, the following steps will be considered:

- Concerns or allegations which fall within the scope of specific procedures, e.g. child protection or discrimination issues, will normally be referred for investigation and consideration under those procedures.
- Where there is any financial impropriety the concern should be referred to the Governing Board/Board of Management, before taking any other action.
- Ensure that matters of a criminal nature are reported to the Police, after consultation with Internal Audit.
- Whether the disciplinary or other relevant management policies, procedures and processes of the School/Foundation need to be applied.

- Appointment of an officer to carry out the investigation under these procedures.

Communication

Within ten working days of a concern being raised, the person who is dealing with the concern will respond in writing either to the employee directly or to NAVEX Global where this was the reporting route. The response will:

- Acknowledge receipt of the concern
- Supply information on any staff support mechanisms (e.g. EAP), and
- Advise whether further investigation or action is required, and if not, why not.

A further update will also be provided 28 days after the report was received, advising of additional progress made and the estimated date a final response will be available.

If the whistleblower has chosen to remain anonymous and non-contactable, they will need to contact NAVEX Global or their original reporting route in order to receive updates.

Investigation process

The impartial investigating manager appointed to undertake the investigation will establish the facts of the matter and assess whether the concern has foundation and can be resolved internally. Other people may need to be interviewed to provide further information and/or clarification concerning the issue(s) raised.

It is essential that written records of all interviews be kept throughout the investigation together with details of any action taken. The investigation will result in a written report and recommendations for corrective action which will be passed to the Headteacher and/or the Chair of the Governing Board/Board of Management, as appropriate to the concerns under consideration, to determine whether formal action shall be taken.

Where any meeting is arranged involving an individual member of staff, which can be off-site, a recognised Trade Union representative or a work colleague may also attend. The School/Foundation will take steps to minimise any difficulties which may be experienced as a result of raising a concern. For instance, if a member of staff is required to give evidence in criminal or disciplinary proceedings, where considered appropriate, the School/Foundation will arrange for them to receive appropriate procedural and/or legal advice.

The member of staff raising the concern will, subject to legal constraints, be advised in writing of the outcome of the investigation and, where appropriate, what action is being taken. This may, for example, include changes to working practices to ensure that a similar situation does not occur again. Where the

concern was raised via NAVEX Global, the employee will be invited to contact the service for feedback at the appropriate time.

Monitoring arrangements

The Governing Board/Board of Management are responsible for overseeing the operation of this policy and the HR Manager is responsible for maintaining a record of concerns raised and the outcomes.

The Governing Board/Board of Management will ensure that whistle blowing procedures are defined, documented, widely circulated and reviewed at appropriate levels, in consultation with a monitoring officer.

The practical aspects of monitoring are to assess whether:

- The policy is being used appropriately
- Concerns are being handled and investigated properly
- There are any discernible patterns of concern across the School/Foundation
- The policy has been effective in identifying and deterring malpractice, and
- Whether more needs to be done to raise awareness of the policy.

Additional Contact Details:

Designated Safeguarding Lead: Jo Czerpak
Safeguarding Officer : Sharon Trezise

NAVEX Global

Freephone 0800 069 8180

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