


# Whistleblowing Policy

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PARTNERSHIP OF SCHOOLS

## **About this policy**

We are committed to running our schools with honesty and integrity, and we expect all staff to maintain high standards in accordance with our Code of Conduct. 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.

The aims of this policy are:

To encourage staff to report suspected wrongdoing or low level concerns as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.

To provide staff with guidance as to how to raise those concerns.

To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.

This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

## **Personnel responsible for the policy**

The Board of Trustees has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The Whistleblowing Officer has day-to-day operational responsibility for this policy and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.

The Whistleblowing Officer, in conjunction with the Audit and Risk Committee should review this policy from a legal and operational perspective at least once every 2 years.

All staff members are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff members are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Whistleblowing Officer.

## What is whistleblowing?

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

This may include:

- criminal activity;
- failure to comply with any legal or professional obligation or regulatory requirements;
- miscarriages of justice;
- danger to health and safety;
- failure to appropriately manage identified safeguarding risks;
- damage to the environment;
- bribery;
- facilitating tax evasion;
- financial fraud or mismanagement;
- conduct likely to damage our reputation or financial wellbeing;
- unauthorised disclosure of confidential information;
- the deliberate concealment of any of the above matters.
- Any niggling concerns which you may have about any individual

A **whistleblower** is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work or your terms and conditions of employment. In those cases you should use the Grievance Procedure (available on the Compass Portal).

It will usually be more appropriate to raise a concern about child safety under our Safeguarding including Child Protection Policy. A concern about a pupil being treated unfairly by the school should be raised initially with the Head Teacher or Child Protection Officer of that school. Pupil complaints will be dealt with separately under our Complaints Procedure.

If you are unsure about whether something is within the scope of this policy you should seek advice from the Head Teacher of the school to which your concern relates or, to the Whistleblowing Officer, whose contact details are at the end of this policy.

## Whistle blowing and Safeguarding

Staff members have a contractual duty to raise concerns if they have information which indicates that a member of staff/supply teacher/volunteer may have;

- behaved in a way that has, or may have, harmed a child;
- possibly committed a criminal offence against or in relation to a child;
- behaved towards a child or children in a way which indicates they would pose a risk of harm if they work regularly or closely with children;
- behaved in a way contrary to the Staff code of conduct.

This applies to any child the member of staff / supply teacher/volunteer has contact with in their personal, professional or community life.

Any allegation should be reported immediately and will be dealt with in accordance with the Trust's Safeguarding including Child Protection Policy and the Keeping Children Safe in Education statutory guidance as outlined above.

### **Raising a whistleblowing concern**

We hope that in many cases you will be able to raise any concerns with the Head Teacher of the school concerned. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.

In some cases, they may refer the matter to the Whistleblowing Officer. However, where the matter is more serious, or you feel that the Head Teacher has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

The Whistleblowing Officer, Rupinder Bansil

The Chief Executive Officer, John Camp

The Trust Safeguarding Lead, Holly Gibson

We also have a dedicated confidential email address for whistleblowing disclosures. Emails sent to this account will be received by the Whistleblowing Officer and the Chair of Trustees.

Contact details are set out at the end of this policy.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

If the concern raised suggests a direct safeguarding concern the headteacher will assess whether it is necessary to refer the matter to the Local Authority Designated Officer (LADO) for Education. Prior to undertaking any further investigations into the actual allegation. If the allegation meets the criteria for LADO involvement a strategy meeting may take place to ascertain who is best fit to undertake further investigations.

Where a member of staff feels unable to raise an issue with those named above other channels available to them include the LADO or NSPCC

### **Whistle Blowing and supply/casual staff**

Keeping Children Safe in Education clearly outlines the responsibility of the school to report, investigate and record any concerns in relation to the behaviour of both supply and casual staff. Staff members must report any concerns as set out in the Safeguarding including Child Protection Policy

### **Confidentiality**

We hope that staff members will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage staff to make disclosures anonymously. 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. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer or the CEO and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

### **Investigation and outcome**

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases, we may appoint an investigator or team of investigators including staff or trustees with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

We will normally aim to conclude our initial investigation within approximately 28 days. However, the timescale may vary depending on the complexity of the matters raised, the availability of witnesses and whether expert legal or other professional advice is required.

In the unlikely event that we conclude a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action. However, a whistleblower who raises a concern genuinely but mistakenly will be supported.

### **If you are not satisfied**

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts above. Alternatively, you may contact the Chair of our Audit and Risk Committee **AND/OR** the Chair of the Board of Trustees. Contact details are set out at the end of this policy.

### **External disclosures**

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace where this is in the public interest. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some limited circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. Whistleblowing to an external agency without first going through the internal procedure is a breach of the Trust's Code of Conduct and could result in disciplinary action. The external agencies that may be used if disclosure is permitted are:

- Department for Education (DfE). (In these circumstances, the DfE/ESFA will assess whether all internal processes have been applied and that we have done everything possible to resolve the issue. If this is not the case, the DfE/ESFA will refer the matter back to us);
- Member of Parliament;
- National Audit Office;
- Health and Safety Executive;
- Police.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your Head Teacher or one of the other individuals set out above for guidance.

### **Protection and support for whistleblowers**

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff members who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

### **Contacts**

<b>Whistleblowing Officer</b>	Rupinder Bansil <a href="mailto:rbansil@compassps.uk">rbansil@compassps.uk</a>
<b>Dedicated Whistleblowing Email Account</b>	<a href="mailto:whistleblowing@compassps.uk">whistleblowing@compassps.uk</a>
<b>Chief Executive Officer</b>	John Camp OBE 020 8850 6841 <a href="mailto:jcamp@compassps.uk">jcamp@compassps.uk</a>
<b>Chair of the Audit and Risk Committee</b>	Louise Rea <a href="mailto:lrea@compassps.uk">lrea@compassps.uk</a>
<b>Trust Safeguarding Lead</b>	Holly Gibson 020 8856 8315/ 0208 310 1912 <a href="mailto:hgibson@compassps.uk">hgibson@compassps.uk</a>

<b>Chair of the Board of Trustees</b>	Susan Skidmore  020 8850 6841  <a href="mailto:sskidmore@compassps.uk">sskidmore@compassps.uk</a>
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### **Monitoring, Evaluation and Review**

The Audit and Risk Committee will assess the implementation and effectiveness of this policy. The policy will be promoted and implemented throughout all Trust schools.

This Policy will be reviewed by the Audit and Risk Committee on a 2-yearly cycle.

Adherence to the policy will be reviewed by the local school committee.

Policy adopted:	Summer 2023
Other related policies:	<ul style="list-style-type: none"> <li>• Grievance Procedure</li> <li>• Complaints Procedure</li> <li>• Code of Conduct</li> </ul>
Next Review:	Summer 2025



## **Appendix 1: For display in staffrooms**

### **Whistleblowing**

#### **What is whistleblowing?**

Whistleblowing is when someone raises a concern about a dangerous or illegal activity or any wrongdoing within their organisation.

Raising a concern is known as "blowing the whistle" and is a vital process for identifying risks to people's safety.

Sharing information or talking through a concern can be the first step to helping an organisation identify problems and improve their practices.

#### **What the law says about whistleblowing**

If you disclose information about wrongdoing the law protects you from being treated unfairly or losing your job.

A disclosure qualifies for protection if you are a worker, and you disclose something about an organisation.

A disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

This is set out in the Public Interest Disclosure Act 1998.

#### **When to Whistleblow**

If you have raised concerns about a child, a member of staff or organisational procedures and you do not feel they have been taken seriously.

You have concerns about the Head Teacher.

#### **Who do I Whistleblow to?**

Rupinder Bansil – Trustee and Whistleblowing Officer: [rbansil@compassps.uk](mailto:rbansil@compassps.uk)

Holly Gibson – Trust Safeguarding Lead: [hgibson@compassps.uk](mailto:hgibson@compassps.uk)

John Camp – CEO: [jcamp@compassps.uk](mailto:jcamp@compassps.uk)

NSPCC Whistleblowing Advice Line - [0800 0280285](tel:08000280285), email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)