WHISTLEBLOWING CODE OF PRACTICE

Status	Statutory	Date created	
Any other statutory names for this policy (where applicable)		Date last reviewed	Summer 2024
Responsibility for this policy (job title)	Headteacher	Frequency of review	Every 3 years
Governors' Committee with responsibility for its review	Personnel Sub Committee	To be put on the school website? (Yes/No)	Yes
Approval necessary	Personnel Sub Committee		

1. About this policy

1.1 We are committed to running our School with honesty and integrity, and we expect all staff to maintain high standards in accordance with our Staff Code of Conduct. This policy covers all employees, governors, consultants, contractors, volunteers, casual workers, agency workers, and job applicants. 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.

1.2 The aims of this policy are:

a) To encourage staff to report suspected wrongdoing 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.
b) To provide staff with guidance as to how to raise those concerns.
c) To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

1.3 This policy covers all employees, governors, consultants, contractors, volunteers, casual workers and agency workers.

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

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

2. Personnel responsible for the policy

2.1 The Governing Body has overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

2.2 The Whistleblowing Officer (Headteacher) 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. If the concern to be raised is about the Whistleblowing Officer, then the Whistleblowing Governor, Linda Oatley, should be contacted instead and they will then act as the Whistleblowing Officer for that concern. Contact details are set out at the end of this policy.

2.3 All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff 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.

3. What is whistleblowing?

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

a) criminal activity; failure to comply with any legal or professional obligation or regulatory requirements
b) sexual harassment (as defined by the Equality Act 2010)
c) miscarriages of justice
d) danger to health and safety
e) damage to the environment
f) bribery
g) financial fraud or mismanagement
h) negligence
i) breach of our internal policies and procedures
j) conduct likely to damage our reputation
k) unauthorised disclosure of confidential information
l) child protection issues
m) the deliberate concealment of any of the above matters

Note on Sexual Harassment: Disclosures regarding sexual harassment are explicitly recognised as "protected disclosures." This includes harassment by colleagues or third parties (such as parents, contractors, or visitors).

3.2 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.

3.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you

should use the Grievance Policy and Procedure.

3.4 If you are uncertain whether something is within the scope of this policy, you should seek advice from the Whistleblowing Officer, whose contact details are at the end of this policy.

4. Raising a whistleblowing concern

4.1 We hope that in many cases you will be able to raise any concerns with your line manager **OR** leadership team link. 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.

4.2 However, where the matter is more serious, or you feel that your line manager **OR** leadership team link has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact the Whistleblowing Officer.

4.3 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.

4.4 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.

5. Confidentiality

5.1 We hope that staff 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.

5.2 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 one of the other contact points listed in paragraph 4 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.

6. Investigation and outcome

6.1 Once you have raised a concern, we will carry out an initial assessment to

determine the scope of any investigation. The School has a strengthened duty to take all reasonable steps to investigate disclosures. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

6.2 In some cases we may appoint an investigator or team of investigators including staff 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.

6.3 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.

6.4 If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

7. If you are not satisfied

7.1 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.

7.2 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 in paragraph 4. Alternatively you may contact the Chair of the Governing Body or our external auditors. Contact details are set out at the end of this policy.

8. External disclosures

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

8.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

8.3 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 customer, 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 line manager **OR** leadership team link or one of the other individuals set out in paragraph 4 for guidance.

9. Protection and support for whistleblowers

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

9.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. This protection now extends to those reporting sexual harassment, ensuring that "victimisation" is treated as a severe disciplinary matter. 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.

9.3 Members of the school must not seek to identify, threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct may be subject to disciplinary action. In some cases the whistleblower could have a right to sue that person for compensation in an employment tribunal.

10. Contacts

Whistleblowing Officer	Marieke Forster 01296 388222 mforster@ahs.bucks.sch.uk	
Whistleblowing Governor	Marina Parker-Allotey Mparker-allotey@ahs.bucks,sch,uk	
Co-Chairs of Governors	Helen Bush hbush@ahs.bucks.sch.uk	Kate Weir kweir@ahs.bucks.sch.uk
AHS external auditors	Hillier Hopkins First Floor, Radius House 51 Clarendon Road Watford WD17 1HP	

Public Concern at Work (Independent whistleblowing charity)	Helpline: (020) 7404 6609 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk
NSPCC Whistleblowing Advice Line	Helpline: 0808 800 5000 E-mail: help@nspcc.org.uk Website: https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/