



Heath Mount School

Whistleblowing Policy

Heath Mount School, Hertfordshire

**Independent Day and Boarding School for Boys
and Girls**

October 2021

Key School Contacts

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<p>Chair of Governors Juliette Hodson</p>	<p>Email: juleshodson@gmail.com Mobile number: 07967 030929</p>
<p>Nominated Safeguarding Governor and Nominated Prevent Governor Richard Dent</p>	<p>Email: richard.dent@zen.co.uk Mobile number: 07768 657109</p>
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Key External Contacts

Protect (independent whistleblowing charity operating a confidential helpline)	protect-advice.org.uk Tel: 020 7404 6609
NSPCC	nspcc.org.uk Tel: 0800 028 0285 (8.00am – 8.00pm Monday to Friday) email: help@nspcc.org.uk
The Modern Slavery Helpline	Tel: 0800 0121 700
For safeguarding contacts, please see the School's Child Protection and Safeguarding Policy and procedures	

1. Introduction

1.1. **Honesty and integrity:** 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 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.

2. Aims:

2.1. the aims of this policy are to:

- 2.1.1. 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;
- 2.1.2. provide staff with guidance as to how to raise those concerns; and
- 2.1.3. reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

3. Scope

- 3.1. This policy is a whole-school policy, including the Early Years Foundation Stage (EYFS) provision and applies to all staff. 'Staff' is defined as all employees, officers, governors, consultants, contractors, volunteers, work placement students, casual workers and agency workers.
- 3.2. A copy of this policy is available on the School website. It is also available to all staff in the 'policies' section of the staff drive and in the staff rooms. It can be made available in large print or other accessible format if required.

4. Wrongdoing at work

- 4.1. **Whistleblowing:** whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:
 - 4.1.1. criminal activity;
 - 4.1.2. safeguarding concerns (see paragraph 9 below);
 - 4.1.3. failure to comply with any legal or professional obligation or regulatory requirements;
 - 4.1.4. miscarriages of justice;
 - 4.1.5. danger to health and safety;
 - 4.1.6. damage to the environment;
 - 4.1.7. bribery;
 - 4.1.8. financial fraud or mismanagement;
 - 4.1.9. other unlawful or unethical conduct in the workplace;
 - 4.1.10. the deliberate concealment of any of the above matters.

5. Whistleblower

5.1. 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 and such disclosure is in the public interest (a **whistleblowing concern**) you should report it under this policy.

6. Grievances

6.1. This procedure should not be used where you have a complaint relating to your personal circumstances in the workplace. The grievance procedure contained in the Employment Manual should be used in such cases.

7. Detriment

7.1. Provided that this procedure is used appropriately and correctly, you will not suffer any detriment as a result of reporting a suspected wrongdoing.

8. Advice

8.1. If you are uncertain whether something is within the scope of this policy you should seek advice from any of the following: the Head; the DSL; the Bursar; the HR and Compliance Manager, Protect, the NSPCC whistleblowing helpline or the Modern Slavery helpline.

9. Safeguarding

9.1. 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 2021). In particular:

9.2. **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 (DSL) or one of the Deputy Designated Safeguarding Leads. 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 DSL is not available.

9.3. **Safeguarding - member of staff:** you should raise any concerns about another staff member with the Head, or if the concern is about the Head, with the Chair of Governors (without first notifying the Head) in accordance with the procedures in Appendix 5 of the School's Child Protection and Safeguarding Policy and procedures.

9.4. **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.

9.5. **The Modern Slavery helpline:** The School is committed to the prevention of Modern Slavery. If you have any queries relating to Modern Slavery, please contact the Bursar. 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.

10. Exit interviews

10.1. All staff are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils,

the conduct of staff or other matters, during the course of their employment in accordance with this policy. Safeguarding children is at the centre of the School's culture and concerns should always be raised in accordance with paragraph 9 above. If issues have not been identified before, safeguarding will always be considered formally during staff performance development reviews and appraisal and finally at exit interviews which are held with all leavers. Staff who raise concerns about working practices at the School to the DSL or an appropriate senior member of Staff will be protected from detriment under this policy.

11. Confidentiality

11.1. 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.

12. Anonymous disclosures

12.1. 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.

13. Investigations: stage one

13.1. Procedure

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

13.2. Response

13.2.1. You can expect a response detailing to whom the disclosure has been notified or any action taken within seven days of your Head of Department / Line Manager becoming aware of the disclosure.

14. Investigations: stage two

14.1. Procedure

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

14.2. Response

14.2.1. You can expect a response detailing any action taken within seven days of the Head / Bursar / Compliance Manager becoming aware of the disclosure.

15. Investigations: stage three

15.1. Procedure

15.1.1. If no such response is forthcoming after seven days from the Head / Bursar / Compliance Manager, if you are not satisfied with the way in which your concern has been handled or if the Head / Bursar / Compliance

Manager is involved in the suspected wrongdoing, you should inform the Chair of Governors of the disclosure.

16. Concerns against governors

16.1. Any concern regarding a governor will be raised by the head with the Chair of Governors, who will follow the procedure above. If the concern relates to the Chair of Governors, then the concern will be taken directly by the Head to the Deputy Chair of Governors. Such a concern would then normally be referred to the Department for Education.

17. Relevant external reporting

17.1. Outside body

17.1.1. 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 paragraph 9 above, that in some circumstances it may be appropriate for you to report your concerns to a relevant outside body including:

- a. the local authority's Designated Officer;
- b. Children's Services;
- c. the NSPCC;
- d. the Health and Safety Executive;
- e. the Environment Agency;
- f. the Information Commissioner;
- g. the Department for Education;
- h. the Department for Business, Energy and Industrial Strategy;
- i. the police;
- j. the Charity Commission;
- k. the Boarding Schools Association;
- l. the Independent Schools Inspectorate;
- m. the Channel Police Practitioner.

18. Advice

18.1. 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:

18.1.1. **Protect:** if you have any concerns about disclosing a suspected wrongdoing the independent whistleblowing charity, Protect, operates a confidential helpline. Staff can call 020 7404 6609 for advice.

18.1.2. **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 0800 028 0285 (8.00 am to 8.00 pm Monday to Friday) or email help@nspcc.org.uk.

- 18.1.3. **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.

19. The media

- 19.1. 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.

20. Queries

- 20.1. If you have any queries about this procedure, you should contact the Head / Bursar / Compliance Manager.

Governors' Committee normally reviewing:	Governance Committee
Effective from:	October 2021
Date last formally approved:	
Date of next review:	October 2024
Person responsible for implementation and monitoring	The Head
Related policies and procedures:	Child Protection and Safeguarding policy