



## Whistleblowing Policy

This policy applies to:

- The whole school and all activities provided by the school, inclusive of those outside of normal school hours.
- All staff (teaching and support and contracted staff), pupils on placement, governors and volunteers working in the school.

The aim of this policy is to give staff and others the confidence to alert the leadership and governors of the school to any inappropriate conduct on the part of colleagues, the senior team or governors, and in particular any conduct which undermines the safety of children.

### Guidance on Terminology

**Harassment:** A person is harassed when they are subjected to unwanted physical or verbal conduct which has the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. The school has a separate Policy on Harassment.

**Bullying:** A person is bullied when they are subjected to offensive, intimidating, malicious or insulting behaviour which through the abuse or misuse of power makes them feel vulnerable, upset, humiliated or threatened.

Such behaviour may include:

- a staff member shouting at, being sarcastic towards, ridiculing or demeaning a pupil or colleague;
- making physical or psychological threats;
- overbearing supervision;
- making inappropriately derogatory remarks about a pupil or colleague;
- persistent, unfair assessment of a pupil's or colleague's work;
- unfairly excluding pupils from classes, projects or events.

Bullying does not include reasonable and constructive criticism of a pupil's or colleague's work or behaviour.

### Availability

This policy is made available to parents, staff and pupils in the following ways: via the school website, within the Parent Policies Folder in the reception area, and on request a copy may be obtained from the school office.

### Monitoring and Review

- This policy is subject to continuous monitoring, refinement and audit by the Principal, who undertakes an annual review of this policy.

Signed:

Amy Cavilla  
Principal  
September 2024

## **1 Preamble**

- 1.1 Radnor House Twickenham is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, employees and others with serious concerns about malpractice or wrongdoing in the school's work are encouraged to come forward and voice those concerns without fear of victimisation. Whatever the source, the Board of Governors is committed to listening to the concerns, taking them seriously and ensuring that they are dealt with promptly and fairly.
- 1.2 We explicitly require staff to report to the Principal or the Governors any concern or allegation about school practices or the behaviour of colleagues that are likely to put pupils at risk of abuse or other serious harm.
- 1.3 The Second Report of the Committee on Standards in Public Life: Local Public Spending Bodies published by the Nolan Committee used the term 'whistleblowing' to mean the confidential raising of problems or concerns within an organisation by a member of staff. This is not 'leaking' information but refers to matters of impropriety, e.g. a breach of law, school procedures or ethics. Nor is whistleblowing the raising of a grievance within the school (which would be dealt with under the staff grievance procedures).
- 1.4 Those external to the school are encouraged to raise any concerns they have about the way in which the school operates through the school's Complaints Policy. Employees are often the first to realise that there may be something seriously wrong with an organisation. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the organisation. They may also fear harassment or victimisation. Employees are encouraged to raise their concerns within the school by applying the approach described in this document, rather than overlooking a problem or blowing the whistle outside the organisation.
- 1.5 The school provides immunity from retribution or disciplinary action against such staff for 'whistleblowing' in good faith. At all levels, including newly appointed and/or support, staff have been given briefing or training on responding to suspicions or allegations of abuse and know what action they should take in response to such suspicions or allegations.
- 1.6 It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the school nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the whistleblowing procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside the school.

## **2 Purpose and Aims of the Policy**

- 2.1 The purpose of this policy is to:
- encourage a member of staff to feel confident in raising serious concerns and to question and act upon concerns and practice;
  - ensure that all members of staff understand that safeguarding is encompassed by this policy;
  - provide an avenue for a member of staff to raise those concerns and receive feedback on any action taken;
  - ensure that a member of staff will receive a response to their concerns and that the member of staff is aware of how to take the matter further if they are not satisfied with our response;
  - reassure the member of staff that they will be protected from reprisals or victimisation for any disclosure that have been made in good faith.
- 2.2 This policy is intended to cover any serious concerns that a member of staff has about any aspect of service provision or the conduct of a member of staff or others acting on behalf of the school, or major concerns that fall out of the scope of other procedures.

- 2.3 The staff and governors of the school seek to run all aspects of school business and activity with full regard for high standards of conduct and integrity. If members of school staff, parents, governors or the school community at large become aware of activities which give cause for concern, Radnor House Twickenham has this whistleblowing policy, which acts as a framework 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 under the school's disciplinary procedure. The school is committed to tackling fraud and other forms of malpractice and treats these issues seriously. We recognise that some concerns may be extremely sensitive and have 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.
- 2.4 The policy specifically aims to:
- provide avenues for employees to raise concerns and receive feedback on any action taken;
  - allow employees to take the matter further if they are dissatisfied with the school's response;
  - reinforce the importance of safeguarding the welfare of children in the school;
  - reassure employees that they will be protected from reprisals of victimisation for whistleblowing in good faith.
- 2.5 There are existing procedures in place (e.g. grievance, harassment and anti-bullying) which make provision for employees to lodge a concern relating to their own employment. This Whistleblowing Policy is intended to complement those procedures by covering concerns that appear to fall outside their scope.
- 2.6 This policy is designed to enable employees of the school to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately, but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include:
- financial malpractice or impropriety or fraud;
  - failure to comply with a legal obligation or statutes;
  - dangers to health & safety or the environment;
  - criminal activity;
  - improper conduct or unethical behaviour;
  - attempts to conceal any of these;
  - safeguarding, whereby any child is harmed or put at risk of harm.

### **3 How to Raise a Concern**

- 3.1 Employees are encouraged to set out in writing the background and history of the concern, giving names, dates and places where possible and the reason why they are particularly concerned about the situation. If employees do not feel able to put their concern in writing, the matter can be raised by telephone or by way of a meeting with the appropriate person. In any event, employees should try to make an immediate note of relevant details, e.g. what was said in a telephone or other conversation. Employees are encouraged to express their concerns at the earliest opportunity. The earlier a concern is raised, the easier it is normally to take action. When raising concerns, employees must declare any personal interest they have in the matter. Although employees are not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for a concern. However, they should not attempt to investigate a concern or accuse individuals directly. Employees may invite their trade union or professional association to raise the matter on their behalf.
- 3.2 Members of staff may also contact directly the local children's services (or, in the case of a possible criminal offence, the police) regarding individual or general safeguarding matters if they so wish: details are set out in the Safeguarding Policy.
- 3.3 As a first step, an employee should normally raise concerns with her/his immediate manager. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, if an employee believes that her/his immediate line manager

is involved, the employee should approach the Principal. In some circumstances, confidential informal advice from the employee's trade union or professional association may help an employee who is unsure of how best to pursue a concern about malpractice.

- 3.4 The individual(s) in receipt of the information or allegation (the investigating officer(s)) will carry out a preliminary investigation on a sensitive and confidential basis. This will seek to establish the facts of the matter and assess whether the concern has foundation and can or should 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 or the regulatory bodies. The action taken by the school will depend on the nature of the concern. The matters raised may:
- be investigated internally;
  - be referred to local children's services;
  - be referred to the police;
  - be referred to an external auditor;
  - form the subject of an independent enquiry.
- 3.5 In order to protect individuals and the school, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures (e.g. pupil protection or discrimination issues or financial irregularities) will normally be referred for consideration under those procedures. Some concerns may be resolved by action agreed between the employee raising the concern and the person to whom it is reported without the need for investigation. The person with whom the concern is raised will write personally to the employee who has raised the concern within ten working days:
- acknowledging that the concern has been received;
  - indicating how s/he proposes to deal with the matter;
  - giving an estimate of how long it will take to provide a response.
- 3.6 Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer(s), possibly in conjunction with the Governors or nominee, will consider how best to report the findings and what corrective action needs to be considered. This may include some form of disciplinary action and/or third party referral such as the police. Employees raising a concern will be informed of the final outcome of any investigation. In some circumstances, however, it may not be possible to reveal the full details where this relates to personal issues involving a third party.
- 3.7 If the whistleblower is dissatisfied with the conduct of the investigation or resolution of the matter, or has genuine concerns that the matter has not been handled appropriately, the concerns may be raised with the Chair of Governors.
- 3.8 This policy is designed to offer protection to those employees of the school who disclose such concerns, provided the disclosure is made in good faith and in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person. It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case, malicious or wild allegations could give rise to legal action on the part of the persons complained about.

#### **4 Confidentiality**

- 4.1 The school will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

## **5 Anonymous Allegations**

- 5.1 This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the school. In exercising this discretion, the factors to be taken into account will include:
- the seriousness of the issues raised;
  - the credibility of the concern;
  - the likelihood of confirming the allegation from attributable sources.

## **6 Untrue / Malicious Allegations**

- 6.1 If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes one or more malicious or vexatious allegations, disciplinary action may be taken against that individual.

## **7 Monitoring**

- 7.1 All concerns raised under this policy will be recorded in strictest confidence together with the outcome in a register held by the Governors. The purpose of this record is to ensure that a central record is kept which can be cross-referenced with other concerns raised in order to monitor any patterns and to assist in monitoring and reviewing the policy.

## **8 Conclusion**

- 8.1 Existing good practice within the school in terms of its systems of internal control, both financial and non-financial, and the external regulatory environment in which the school operates, ensures that cases of suspected fraud or impropriety rarely occur.
- 8.2 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.
- 8.3 Any actions arising from allegations/investigation must be in accord with the school's disciplinary procedure and/or Safeguarding Policy, which should cover all of the potential areas of concern.