

School's Model Whistleblowing Procedure Local Authority Maintained Schools



GCC Plus
Business and Development Services



Gloucestershire
COUNTY COUNCIL

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1.0 Introduction

- 1.1 All of us at one time or another have a concern about what is happening at work. Usually these are easily resolved. However, when the concern feels serious because it is about a possible fraud, danger, corruption or malpractice or maladministration (the term used when the school has done something wrong which affects a member of the public) that might affect others or the school itself, it can be difficult to know what to do.
- 1.2 You may be worried about raising such a concern and may think it best to keep it to yourself, perhaps feeling it's none of your business or that it's only a suspicion. You may feel that raising the matter would be disloyal to colleagues, managers or to the school. You may decide to say something but find that you have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.
- 1.3 The Governors, Headteacher and leadership team of the school are committed to running the school in the best way possible and to do so we need your help. This policy aims to reassure you that it is safe and acceptable to speak up and to enable you to raise any concern you may have about malpractice at an early stage and in the right way. Any reported concern will be taken seriously. Rather than wait for proof, we would prefer you to raise the matter when it is still a concern.
- 1.4 This policy applies to all those who work for us and with us, whether full-time or part-time, employed through an agency or as a volunteer.
- 1.5 The Whistleblowing Policy is primarily for concerns where you witness something which affects other people – groups of colleagues, pupils, members of the public or the school itself. If you wish to make a complaint about your own employment or how you personally have been treated, please use the grievance procedure or the Dignity and Respect at Work (Anti-Bullying) Policy - which you can get from [insert where the policies can be accessed by staff].
- 1.6 The phrase 'whistle-blowing' in this procedure refers to the disclosure internally or externally by employees of malpractice, as well as illegal acts or omissions at work. This Procedure makes it clear that employees can report, in a confidential manner, their concerns without fear of victimisation, subsequent discrimination or disadvantage. Employees of the school who, in the public interest, speak out against corruption or malpractice at work have statutory protection against victimisation and dismissal.
- 1.7
- 1.8 If in doubt – raise it!

2.0 Our Assurances to You

2.1 Your safety

The Governors, Headteacher and Leadership Team are committed to this policy. Provided you are raising a genuine concern, it does not matter if you are mistaken. Of course, we do not extend this assurance to someone who maliciously raises a matter they know is untrue. If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any form of reprisal as a result. We will not tolerate the harassment or victimisation of anyone raising a genuine concern and we consider it a disciplinary matter to victimise anyone who has raised a genuine concern.

2.2. Your confidence

With these assurances, we hope you will raise your concern openly and at the first opportunity. However, we recognise that there may be circumstances when you would prefer to speak to someone confidentially first. If this is the case, please say so at the outset. If you ask us not to disclose your identity, we will not do so without your consent unless required by law. You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed.

Please remember that if you do not tell us who you are (and therefore you are raising a concern anonymously) it will be much more difficult for us to look into the matter. We will not be able to protect your position or to give you feedback. Accordingly, you should not assume we can provide the assurances we offer in the same way if you report a concern anonymously.

If you are unsure about raising a concern, you can get confidential independent advice from Protect (formerly Public Concern at Work - see contact details under Independent Advice).

3.0 How to Raise a Concern Internally

3.1 Please remember that you do not need to have firm evidence of wrong-doing before raising a concern. However, we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

3.2 Step one:

If you have a concern, we hope you will feel able to raise it first with your manager or Headteacher. This may be done verbally or in writing.

4.3. Step two:

If you feel unable to raise the matter with your manager, for whatever reason, please raise the matter with: the Chair of Governors

If you want to raise the matter confidentially, please say so at the outset so that appropriate arrangements can be made.

4.4. Step three:

If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, please contact:

Rob Ayliffe
Monitoring Officer
Gloucestershire County Council
Shire Hall
Gloucester
GL1 2TZ
Telephone 01452 328506
Email: rob.ayliffe@gloucestershire.gov.uk

The Monitoring Officer will refer all concerns in relation to possible financial impropriety or irregularity to the Chief Internal Auditor (CIA) and/or the Director of Finance.

You may wish to use our 24 hour “whistleblowing” answerphone service on 01452 427052 which is managed by Internal Audit or the on-line form ([link](#)) which goes direct to the Monitoring Officer.

4.0 Independent Advice

- 4.1 If you are unsure whether to use this policy or you want confidential advice at any stage, you may contact the independent charity Protect on 020 3117 2520 or via their website at <https://protect-advice.org.uk/level-3-subscriber-login/> (Password: Level3Protect). Their legal advisers can talk you through your options and help you raise a concern about malpractice at work.
- 4.2 If you are a member of a trade union, you can also contact them for advice (see page 10).

5.0 Concerns about Safeguarding Adults and Children

- 5.1 The employer is responsible for investigating concerns about safeguarding adults or children or child protection matters. These should be raised under separate procedures, details below:
- 5.2 If you think someone else is being abused, you must tell someone:

Call the Police

- Telephone 101
- In an emergency telephone 999

For adults, you can contact the Adult Help Desk

- Telephone 01452 426868
- You can also email: socialcare.enq@gloucestershire.gov.uk

For children, you can contact the Children's Helpdesk

- Telephone 01452 426565
- You can also email: childrenshelpdesk@gloucestershire.gov.uk

- [Speak to the school's Designated Safeguarding Lead \(DSL\) and the Safeguarding Team.](#)

If you are worried or concerned about anyone under 18 who you think is being abused or neglected or that a child and their family need help and support, please call 01452 426565.

6.0. How We Will Handle the Matter

- 6.1. We will acknowledge receipt of your concern within 10 working days if contact details are provided. We will assess it and consider what action may be appropriate. This may involve an informal review, an internal inquiry, or a more formal investigation. We will tell you who will be handling the matter, how you can contact them, and what further assistance we may need from you. We will write to you summarising your concern and setting out how we propose to handle it and provide a timetable for feedback. If we have misunderstood the concern or there is any information missing, please let us know.

- 6.2. When you raise the concern, it will be helpful to know how you think the matter might best be resolved. If you have any personal interest in the matter, we do ask that you tell us at the outset. If we think your concern falls more properly within our grievance, bullying and harassment or other relevant procedure, we will let you know.
- 6.3. Whenever possible, we will give you feedback on the outcome of any investigation. Please note, however, that we may not be able to tell you about the precise actions we take where this would infringe a duty of confidence we owe to another person. If you have raised a concern anonymously, we will not be able to write to you.
- 6.4. While we cannot guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly and properly. By using this policy, you will help us to achieve this.
- 6.5. If at any stage you experience reprisal, harassment or victimisation for raising a genuine concern please contact your Headteacher or Chair of Governors. You may also wish to contact your trade union representative (if you are a trade union member). Alternatively, you can contact Public Concern at Work for independent and confidential advice.

7.0. External Contacts

- 7.1. While we hope this policy gives you the reassurance you need to raise your concern internally with us, we recognise that there may be circumstances where you can properly report a concern to an outside body. In fact, we would rather you raised a matter with the appropriate regulator than not at all. The following organisations are possible contact points. Protect (formerly Public Concern at Work) (or, if applicable, your trade union) will be able to advise you on such an option if you wish.

Organisation	Role	Contact Details
Action Fraud	Report fraud and cyber crime.	Tel: 0300 123 2040 Website: http://www.actionfraud.police.uk/report_fraud
Care Quality Commission	Contact them about matters relating to the provision of health and social care.	CQC National Customer Service Centre Citygate Gallowgate Newcastle upon Tyne NE1 4PA Tel: 03000 616161 Website: www.cqc.org.uk cqc - contact us - Report a Concern
Charity Commission	Contact them about: the proper administration of charities in England and Wales and of funds given or	Tel: 0300 066 9197 Email: whistleblowing@charitycommission.gsi.gov.uk Website: www.gov.uk/charity-commission

	held for charitable purposes in England and Wales.	
Department for Work and Pensions	Central government department responsible for benefits and pensions	National Benefit Fraud Hotline Telephone: 0800 854 440 (English) Telephone: 0800 678 3722 (Welsh) Textphone: 0800 328 0512 Monday to Friday, 8am to 6pm Find out about call charges You can also report suspected benefit fraud online or by post. National Benefit Fraud Hotline Mail Handling Site A Wolverhampton WV98 2BP
Environment Agency	Contact them about: acts and omissions which have an actual or potential effect on the environment or the management or regulation of the environment. This includes those relating to pollution, abstraction of water, flooding, the flow in rivers, inland fisheries and migratory salmon or trout.	National Customer Contact Centre PO Box 544 Rotherham S60 1BY Tel: 03708 506 506 Website: www.gov.uk/environment-agency
Equality and Human Rights Commission	The Equality and Human Rights Commission (EHRC) monitors human rights, protecting equality across 9 grounds - age, disability, gender, race,	http://www.equalityhumanrights.com/ Advice Line: 0808 800 0082

	religion and belief, pregnancy and maternity, marriage and civil partnership, sexual orientation and gender reassignment. EHRC is an executive non-departmental public body, sponsored by the Department for Education.	
External Auditors (Grant Thornton)	Objections to the council's accounts.	A guide to your rights can be found at https://www.nao.org.uk/code-audit-practice/wp-content/uploads/sites/29/2015/03/Council-accounts-a-guide-to-your-rights.pdf Objections should be addressed to the auditor, Grant Thornton UK LLP, The Canterbury Business Centre, 18 Ashchurch Road, Tewkesbury, GL20 8BT.
Health and Safety Executive	Contact them about: - the industries and work activities for which the Health and Safety Executive is the enforcing authority under the Health and Safety (Enforcing Authority) Regulations 1998 - the health and safety of individuals at work, or the health and safety of the public arising out of or in connection with the activities of persons at work	Tel: 0300 003 1647 Online form: www.hse.gov.uk/contact/raising-your-concern.htm Or contact GCC's Safety, Health and Environment (SHE) Team. E-mail: she@gloucestershire.gov.uk Telephone: 01452 425350.

HM Revenue and Customs	Contact them about: •the administration of UK taxes •the administration of national insurance and tax credits systems •customs and border-related functions •criminal investigations	HMRC Fraud Hotline Cardiff CF14 5ZN Tel: 0800 788 887 Website: www.gov.uk/government/organisations/hmrevenue-customs/contact/reporting-tax-evasion
Information Commissioner's Office	Contact them about: compliance with the requirement of legislation relating to data protection and to freedom of information.	The Information Commissioner's Office Wycliffe House Water Lane Wilmslow SK9 5AF Tel: 0303 123 1113 Email: casework@ico.org.uk Website: www.ico.org.uk
Gloucestershire MPs		Gloucestershire MPs
Ofsted	Ofsted is the Office for Standards in Education, Children's Services and Skills. We inspect and regulate services that care for children and young people, and services providing education and skills for learners of all ages.	Complaints about schools and childminders Contact form https://www.gov.uk/com... Complaints about other providers Ofsted inspects Contact form https://contact.ofsted... General enquiries Emailenquiries@ofsted.gov.uk Contact form https://contact.ofsted... General enquiries 0300 123 1231 Our helpline is open from 8 am until 6 pm, Monday to Friday. Contact Ofsted about concerns EmailCIE@ofsted.gov.uk Contact Ofsted about concerns 0300 123 4666
Police	Gloucestershire Constabulary Waterwells HQ	Telephone 101 In an emergency telephone 999

Serious Fraud Office	Contact them about: serious or complex fraud, including bribery and corruption, in England, Wales or Northern Ireland and civil recovery of the proceeds of unlawful conduct.	The Director of the Serious Fraud Office 2-4 Cockspur Street London SW1Y 5BS Website: www.sfo.gov.uk/contact-us/reporting-serious-fraud-bribery-corruption
Trade Union	Formal staff representation.	Gloucestershire County Council recognised list of Trade Unions: Trade unions and industrial action (gloucestershire.gov.uk)