

WOULDHAM ALL SAINTS CHURCH OF ENGLAND PRIMARY SCHOOL

Whistle Blowing Policy

Wouldham All Saints Church of England Primary School is committed to the highest possible standards of openness, probity and accountability. If employees and others working with us (including volunteers) have concerns regarding any aspect of our work we encourage them to come forward and voice their concerns. In some instances, concerns may need to be expressed on a confidential basis.

This policy is intended to encourage individuals to raise serious concerns internally within KCC, without fear of reprisal or victimisation, rather than over-looking a problem or raising the matter outside.

This policy aims to ensure individuals:

- can feel confident in raising serious concerns and to question and act upon concerns about practice
- are provided with avenues to raise concerns and receive feedback on any action taken
- receive a response to their concerns and are aware of how to pursue the matter further if they are not satisfied with the outcome
- can be reassured that they will be protected from reprisals or victimisation if they make a disclosure
- are aware that, in the case of KCC employees, a false or malicious disclosure will be addressed in accordance with the KCC Disciplinary Procedure.

The Whistleblowing Policy applies to all employees including all staff at Wouldham All Saints Church of England Primary School, agency workers, volunteers and those contractors working on KCC premises (e.g. cleaners, builders and drivers etc.) Suppliers and those providing services under a contract with KCC in their own premises are also covered by the policy.

Use of the Whistleblowing Procedure

You may become aware of, or directly witness, situations or conduct that makes you feel uncomfortable or you regard as inappropriate. The Whistleblowing Procedure provides a means for you to raise concerns about matters not related to your own employment or your work within KCC but which you feel need to be examined.

Concerns that are raised will be addressed in accordance with the associated whistleblowing procedure and these can include matters such as:

- conduct which is, has been or is likely to be an offence or breach of law
- conduct that has occurred, is occurring or is likely to occur the result of which KCC fails to comply with a legal obligation. For example unauthorised use of public funds, possible fraud and corruption, sexual or physical abuse of clients, or other unethical conduct
- discrimination of any kind and waste/frivolous expenditure
- disclosures related to past, current or likely miscarriages of justice
- past, current or likely health and safety risks, including risks to the public as well as other employees (see below)
- past, current or likely damage to the environment
- concerns about any aspect of service provision
- other concerns regarding the conduct (including breaches of known standards or KCC's Standing Orders) of officers or KCC Members or others acting on behalf of the KCC

All concerns raised will be treated in confidence and every effort will be made not to reveal the individual's identity if this is their wish. However, in certain cases, it may not be possible to maintain confidentiality if the individual is required to come forward as a witness.

Allegations against members of staff and volunteers

Wouldham All Saints Church of England Primary School recognises that it is possible for staff and volunteers to behave in a way that might cause harm to children and takes seriously any allegation received. Such allegations should be referred immediately to the Head Teacher (or member of SLT in their absence) who will first contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member.

In the event of allegations of abuse being made against the Headteacher then staff are advised that allegations should be reported to the Chair of Governors who will contact the LADO in the first instance. The Headteacher or Chair Of Governors can be contacted via the school (01634 861434 office@wouldham.kent.sch.uk).

Contact details for the LADO Telephone: **03000 41 08 88** or email kentchildrenslado@kent.gov.uk.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the senior leadership team.

All members of staff are made aware of the school's Whistle-blowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.

Members of Staff can also access the NSPCC whistleblowing helpline if they 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

Wouldham All Saints Church of England Primary School has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or Schools Personnel Service.

Concerns expressed anonymously are much less powerful than those that are attributed to a named individual. However anonymous allegations will be considered and investigated at the school's discretion. In exercising the discretion, the factors to be taken into account would include:

- the seriousness of the issues raised
- the credibility of the concern;
- the likelihood of confirming the allegation from attributable sources.

Disciplinary action will only be taken against individuals who knowingly make false, malicious or vexatious allegations.

How to raise a concern

General Concerns can be raised verbally or in writing.

A concern raised in writing should:

- set out the background and history of the concern, giving names, dates and places where possible
- the reason why you are particularly concerned about the situation. The earlier a concern is raised the easier it is to take action.

Although you are not expected to prove beyond doubt the truth of an allegation, you need to demonstrate to the person contacted that there are sufficient grounds for your concern. A trade union or professional association may raise a matter on behalf of an employee.

Whenever possible you should raise your concern in the first instance with your immediate manager (i.e. Headteacher, Assistant Headteacher, Family Leader, Class Teacher, or the Chair of Governors). If this is not appropriate, you should refer the matter to KCC by contacting:

Kent County Council Whistleblowing Helpline 03000 414 500

Email: internalaudit@kent.gov.uk

You can also contact the Area Education Officer on 03000 410058 or (if urgent) 07967467106.

KCC and Wouldham All Saints CEP School has a zero tolerance approach to acts of bribery and corruption. Any instances of suspected bribery and corruption must be reported. If you do not feel able to report your concerns to your line manager, the Whistle Blowing Procedure can be used to confidentially raise this matter.

KCC Whistle Blowing Procedures

KCC Internal Audit maintain a central record of whistleblowing concerns reported to them. The record will include the areas of Council business that have been affected, a summary of action taken and the resulting outcome, follow up and feedback. Managers that receive Whistleblowing concerns must report the matter to Internal Audit for inclusion on the central record by sending the details to internalaudit@kent.gov.uk with the subject line 'Whistleblowing'.

KCC has an [Anti-Fraud and Corruption Strategy](#) and all suspected financial irregularities must be reported to the Head of Internal Audit.

Whistleblowing Hotline

Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve an organisation's operations. If you wish to raise any type of Whistleblowing concern directly with Internal Audit (anonymously if necessary) please call the Whistleblowing helpline on 03000 414 500 or e-mail internalaudit@kent.gov.uk.

The action KCC takes will depend on the nature of the concern. The matters raised may:

- be investigated internally by management, Internal Audit or through the disciplinary or other internal process
- be referred to the Police
- be referred to the External Auditor
- form the subject of an independent inquiry

In order to protect individuals and KCC, 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. child protection or discrimination issues) will normally be referred for consideration under those procedures.

An appropriate manager will conduct preliminary enquiries into the matters you have raised. In order to determine whether your concern needs to be formally investigated the manager will seek advice from the Human Resources Team and, where appropriate, safeguarding professionals, Internal Audit or the Counter Fraud Manager.

The formal investigation will identify what, if any, action is required to address the concerns you identified via the Whistleblowing Procedure. This may involve disciplinary action against another KCC employee or the involvement of agencies such as the Police or the External Auditor.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.

You will be written to within ten working days:

- acknowledging that the concern has been received
- indicating how KCC proposes to deal with the matter
- giving an estimate of how long it will take to provide a final response
- informing you if any initial enquiries have been made
- whether further investigations will take place and, if not, why not.

Contact

The amount of contact between the officers considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought.

Attending Meetings

When any meeting is arranged you have the right to be accompanied by a trade union representative or a workplace colleague who is not involved in the area of work to which the concern relates.

Protection from Reprisals and Victimisation

KCC does not tolerate reprisals, victimisation or harassment and will take all reasonable action to protect you if you raise a concern via the Whistleblowing Procedure. KCC will treat any reprisals, victimisation or harassment as a serious matter and if this involves a KCC employee it will be investigated in accordance with the Disciplinary Procedure. In the event of a disciplinary case being found, this could potentially result in the person's dismissal.

Support

KCC will take steps to minimise any difficulties you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, KCC will advise or arrange for you to have advice about the procedure.

KCC accepts that you need to be assured that concerns will be properly addressed and, subject to legal constraints, will provide information about the outcomes of any investigations.





How to take the matter further

This procedure is intended to provide individuals with an avenue to raise concerns within KCC. If you are not satisfied, and feel it is right to take the matter further you do have the option to report your concerns with an appropriate external body, e.g. the Public Concern at Work independent helpline or a relevant 'prescribed person'. A 'prescribed person' is someone who is independent of KCC but has an authoritative relationship with it, e.g. a legislative or regulatory body such as the Health & Care Professions Council (HCPC). If you do choose to raise your concerns with a prescribed person or body, it must be one that deals with the matter you are raising, e.g. a disclosure about wrongdoing in a care home can be made to the Care Quality Commission.

Further information and a list of [prescribed persons](#) is available on the Government's Gov.UK website.

	External Body	Contact Details
Independent Helpline	PUBLIC CONCERN AT WORK	020 7040 6609

Other reporting options:

-  a local Kent County Council member
-  relevant professional bodies or regulatory organisations
-  a solicitor
-  the Police

If you have a particular concern regarding how child protection issues are being handled by KCC or another organisation you can contact the NSPCC Whistleblowing helpline on 0800 0280285. Further information is available on the [NSPCC website](#).

If your concern involves a service which is regulated by Ofsted you may wish to contact the Ofsted Whistleblowing Hotline on 0300 1233155 (available from 8.00am to 5.00pm Monday to Friday) or e-mail whistleblowing@ofsted.gov.uk

If a matter is taken outside KCC, you must take all reasonable steps to ensure that confidential or privileged information is not disclosed. If in doubt, check with the relevant named KCC contact (as set out above).

Public Interest Disclosure

Public Interest Disclosure Act 1998 gives employees two safeguards in respect of disclosures of information.

- An employee is entitled not to be subjected to any detriment by virtue of having made a protected disclosure.
- The dismissal of any KCC employee directly due to the individual having made such a disclosure will automatically be unfair

False or Malicious Allegations

Disciplinary action will only be taken against individuals who make false, malicious or vexatious allegations.

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