

## Whistleblowing Policy

Prepared with reference to the DfE publication "Keeping Children Safe in Education" September 2019.

### Aims

The Iona School is committed to maintaining a culture of openness, accountability and integrity. We seek to ensure that employees feel secure in raising concerns about any activity which may harm individuals or undermine the status of the school. The school has adopted the Nottingham City Council guidelines for Whistleblowing. This policy gives clear guidance to those who may need to raise concerns.

The Iona School Staff:

- Encourage you to feel confident in raising serious concerns and to question and act upon concerns;
- Provide avenues for you to raise those concerns and receive feedback on any action taken;
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied;
- Reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have raised any concern in good faith.

### Introduction

As a person working for the Iona School you may be the first to realise that there could be something seriously wrong within the school. However, you may feel that speaking up would be disloyal to your colleagues. You may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

We are committed to the highest possible standards of openness, integrity and accountability. We expect employees, and others that we deal with, who have serious concerns about any aspect of our work, to come forward and voice those concerns.

The purpose of this policy and procedure is to make it clear that you can raise your concerns in confidence without fear of victimisation, subsequent discrimination or disadvantage. We encourage you to raise serious concerns in the first instance **within** the school rather than overlooking a problem or 'blowing the whistle' outside, and we would rather that you raised the matter when it is just a concern rather than waiting for proof.

You should raise appropriate safeguarding concerns with the Designated Safeguarding Lead at the Iona School or the Chair of College. Consequently, if the matter concerns them, the Chair of Trustees.

The policy and procedure applies to all employees and those contractors working for the us, for example, agency staff, builders, and drivers. It also covers suppliers and those providing services under a contract with The Iona School.

This policy has been prepared in response to the Public Interest Disclosure Act 1998 in accordance with Government guidance on the issue and has been discussed with the relevant trade unions and has their support. The procedure has the full support of the Joint Consultative and Negotiating Committee and Unison. Any changes, other than statutory, will be referred to the Joint Consultative and Negotiating Committee for consultation.

We recognise employees may wish to seek advice and be represented by their trade union representative when raising a concern under the policy, and acknowledges and endorses the role trade union representatives play in this area.

Trade union representatives acting in accordance with the policy and procedure will not suffer detriment in their employment with us

There are existing procedures in place to enable employees to lodge grievances relating to their employment. The Whistleblowing Policy is intended to cover concerns that fall outside the scope of other procedures, including the Complaints Policy. This policy therefore includes your concerns about:

- Conduct which is an offence or a breach of law;
- \*Harassment of others;
- \*Sexual, racial or disability discrimination against others;
- Disclosures related to miscarriages of justice;
- Health and safety risks, including risks to the public as well as other employees;
- Damage to the environment;
- The unauthorised use of funds;
- Possible fraud and corruption;
- Sexual or physical abuse of clients;
- Child abuse or safeguarding issues;
- Other unethical or improper conduct (not otherwise included in this list);
- Concealing information about any of these matters.

\*Complaints relating to harassment of or discrimination against an individual will be dealt with under the specific procedures relating to those matters.

The policy applies to service provision, the conduct of staff and others acting on behalf of The Iona School.

It should be emphasised that this policy is intended to assist individuals who have discovered malpractice or serious wrongdoing, provided they make the disclosure in accordance with the policy. It is not designed to question financial or business decisions taken by the school nor may it be used to reconsider any matters that have already been addressed under the harassment, complaint or disciplinary procedures. Individuals who make disclosures outside the arrangements set out here will not be protected under this policy and may not be protected under the act.

## **Our Promise to You**

We are committed to good practice and high standards and want to be supportive of employees and others who work for us.

We recognise that the decision to report a concern can be a difficult one to make. If you raise your concern based on reasonable belief and in good faith, you have nothing to fear because you will be doing your duty to your employer and the public and The Public Interest Disclosure Act 1998 will protect you from dismissal or other detriment. If your concern is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

We will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith, even if you are genuinely mistaken in your concerns.

Any harassment or victimisation of a whistle blower may result in disciplinary action against the person responsible for the harassment or victimisation.

Any investigations into allegations arising from your whistleblowing will not influence or be influenced by any other personnel procedures to which you may be subject.

## Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity, if you so wish. If we are not able to resolve your concern without revealing your identity (e.g. because your evidence may be needed in Court), we will discuss this with you.

## Anonymous Allegations

This policy encourages you to put your name to your allegation whenever possible. Concerns expressed anonymously are much less powerful but may be considered by us taking into account:

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

## Useful Contacts

Designated Safeguarding Lead:	Susane Buerstein	0115 941 5295
Deputy Designated Safeguarding Lead:	Eileen Hickman	0115 941 5295
Deputy Designated Safeguarding Lead:	Chantell Walker	0115 941 5295
Deputy Designated Safeguarding Lead:	Emma Stacey	0115 941 5295
Designated Trustee for Safeguarding:	Martin Taylor	07968 007193
DSL Consultation Helpline:		07711 189544
Nottingham City - Children and Families Direct:		0115 876 4800
Ofsted (Piccadilly Gate, Store Street, Manchester, M1 2WD):		0300 1231231
Education Welfare Service:		0115 876 2965
Email: <a href="mailto:educationwelfareservices@nottinghamcity.gov.uk">educationwelfareservices@nottinghamcity.gov.uk</a>		
Link Person at Government (Business Support):	Tom Brittain	0115 876 3428
LADO (first point of contact):	Karen Shead	0115 876 4725
LADO:	Richard Powell	0115 876 4747 / 07904 813968
Nottinghamshire Police PREVENT/CHANNEL:	Asif Mohammed	0115 801 5060 ext 101
PREVENT referrals/assistance:		
Email: <a href="mailto:prevent@nottinghamshire.pnn.police.uk">prevent@nottinghamshire.pnn.police.uk</a>		
Multi Agency Safeguarding Hub (MASH) (Nottingham County)		0300 500 8090

*This number is available 24 hours a day; between 8.00am and 6.00pm the call will be passed to the Access Team, outside those hours the call will go to the Duty Team.*

Nottinghamshire Police 101 / 999  
Ofsted Early Years 0300 123 1231

NSPCC (online concerns) 0808 800 5000  
NSPCC provides a helpline for professionals, email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk). The helpline provides expert advice and support for school and college staff and will be especially useful for the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads.

## Procedure

### How to Raise a Concern

As a first step, you should normally raise concerns with your immediate manager, School Business Manager or if you wish your trade union. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.

If you are unsure whether or how to raise a concern you can contact the independent voluntary organisation Public Concern at Work on 020 7404 6609, for guidance.

Concerns may be raised verbally or in writing on the Whistleblowing Form which you can obtain from the School Business Manager.

The Designated Safeguarding Lead or School Business Manager, as the person responsible for this policy, will be informed of all concerns raised under the policy (unless, of course, they are against these staff members).

If you believe that senior management is involved, or if you are not happy with our response to your concerns, you should approach the:

- Chair of Trustees
- Ofsted
- Trustee responsible for safeguarding

The earlier you express the concern the easier it is to take action. Although you are not expected to provide proof for your concern, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern. You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

You may invite your trade union, professional association representative or a friend to be present during any meetings or interviews in connection with the concerns you have raised. Any meetings that need to be arranged with you can be held off-site if you wish.

If you are not an employee of The Iona School we would prefer that you raise your concern in the first instance with the Chair of Trustees.

### How We Will Respond

Whoever you raise your concerns with will appoint a person unassociated with the matter to investigate. You will be informed who this is. Confidentiality will be maintained at all times.

In order to protect individuals and those accused of misdeeds or possible malpractice, this person will carry out initial enquiries in order to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle which we have in mind is the public interest and child welfare. Concerns or allegations which fall within the scope of specific procedures (for example, safeguarding, harassment or discrimination issues) will normally be referred for consideration under those procedures.

Following these initial enquiries, we will respond to your concerns as appropriate. Your concern may:

- be investigated by management, internal audit, or through the disciplinary process;
- be referred to the police;
- be referred to an external auditor;
- form the subject of an independent inquiry.

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

Within seven working days of a concern being raised, the person appointed to investigate will contact you (in a way which does not arouse suspicions in your workplace):

- acknowledging that the concern has been received;
- indicating how we propose to deal with the matter;
- giving an estimate of how long it will take to provide a final response;
- telling you whether any initial enquiries have been made;
- supplying you with information on staff support mechanisms;
- advising you of your entitlement to seek advice and representation from your trade union representative;
- telling you whether further investigations will take place and if not, why not, and
- to agree with you how to proceed if you have chosen to remain anonymous.

We will do what we can to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, we will arrange for you to receive advice about the procedure and other appropriate support.

We accept that you need to be assured that the matter has been properly addressed. Subject to legal constraints and any confidentiality or other issues, we will inform you of the outcome of any investigation.

## **Whistleblowing on Safeguarding Issues**

### **General Principles**

The Iona School employees must acknowledge the individual responsibilities to bring matters of concern to the attention of management and/or outside agencies. Whilst this is difficult, it must be important where the welfare and safety of children may be at risk. You may be the first to recognise something is wrong, but may not feel able to discuss your concerns with your colleagues. This may be out of loyalty or you may fear harassment or victimisation. These feelings, however natural, must never result in a child or young person continuing to be at risk. Remember, it is often the most vulnerable children or young people who are often targeted. These children need us all to be vigilant to safeguard their welfare. The school will always listen and investigate with your safety in mind. We will be discreet and always consider the impact to you.

**Don't think "what if I am wrong?" think "what if I am right?"**

### Reasons to Whistle Blow on Safeguarding Issues

- You have a concern about unacceptable practice or behaviour;
- You notice a situation that causes unease and you feel is wrong;
- To prevent an issue escalating;
- To protect others and reduce risk to yourself;
- To prevent yourself becoming implicated.

Think about what is stopping you from whistleblowing:

- starting a chain of events which spirals;
- disrupting the working day;
- fear of getting it wrong;
- fear of repercussions or damaging reputation and careers;
- fear of not being believed.

None of the above should be an issue, remember all will be done discreetly and with as little interruption as possible.

### How to Report

- in the first instance speak to your manager and/or DSL;
- if possible, put your complaint in writing;
- if you feel you cannot talk to them, take this to either the School Business Manager or the Trustee for safeguarding. They are named the school's Safeguarding Policy or can be found on the whistleblowing flowchart

### What to do if you Feel we are not Taking your Whistleblowing Complaint Seriously

If you have exhausted the avenues through school, we would urge you to speak to the LADO.

### Issue Date

This policy takes effect from December 2019.

### Review Date

This policy will be reviewed and revised on an annual basis.

### Endorsement

Full endorsement to this policy is given by:

<b>Name:</b>	Mr Martin Taylor
<b>Position:</b>	Trustee
<b>Signed:</b>	
<b>Date:</b>	16 <sup>th</sup> December 2019

# Managing an Allegation against a Member of Staff

