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| **Policy** | **Whistleblowing** | | |
| **Date for Review** | October 2025 | **Schedule** | Annually |
| **Date agreed by staff** | October 2024 | **Date agreed by GB** | October 2024 |

# Introduction

The Imperium Federation is committed to offering the highest standard of education to the young people of Greenwich. As such high standards of openness and accountability, built on a culture of honesty and integrity are vital to the operation of the school. This is why the federation encourages all employees with serious concerns about any aspect of its operation to come forward and raise their concern without fear of being disloyal or suffering harassment or victimisation.

As public servants all employees are subject to the standards of public service that the federations leadership qualities set out:

- *Selflessness* – to act for the greater good, not for our own power, status or relationships
- *Honesty* – to reflect issues as they are and to be honest with each other
- *Openness* – to explain our actions and respond to criticism, not just to demand compliance
- *Integrity* – to do what is right, and what builds up a solid and reliable education system
- *Objectivity* – to make decisions on merit, not because they make life easier
- *Accountability* – to take responsibility for our actions, as public servants
- *Leadership* – to act according to these six principles and to enable others to do so too

It is important to the operation of our inclusive and cohesive community that staff do not ignore concerns they may have, and that any suspicions of malpractice should be reported.

This procedure provides a clear and safe route for staff to raise and report any concerns within the school at an early stage without fear of reprisal. The Governing Board and School Leaders recognise that in certain situations it will be necessary to proceed on a confidential basis in order to protect the identity of the 'whistleblower'.

## 2. Rationale for a Whistleblowing Policy

Fraud or other malpractice will not be tolerated within the Federation or in the Royal Borough of Greenwich. The early identification and elimination of such activities is of benefit to the Royal Borough, the school, its employees and, above all, the residents of Greenwich.

The Royal Borough recognises that its employees are often the first people to suspect or realise that something is wrong. It is therefore fully committed to dealing responsibly and professionally with employees' genuine concerns about fraud or other unlawful practices. The federation and the council also recognise that, for a number of reasons, employees often feel reluctant to raise such concerns.

This procedure and policy therefore applies to all employees and those contractors working for the school. It does not substitute normal line management procedures or offer an alternative for existing policies such as the school's Grievance, Disciplinary or Complaints procedures.

## 3. The Public Interest Disclosure Act

The Act gives you legal protection if you are victimised or unfairly dismissed because you have 'blown the whistle' about particular concerns at work. The Act covers whistleblowing where any of the following has occurred, is occurring, or is likely to occur:

- A criminal offence
- Failure to comply with a legal obligation
- A miscarriage of justice
- A danger to the health and safety of any person
- Damage to the environment
- Deliberate concealment (i.e. a cover up) of any of the above.

The law imposes a number of restrictions on when and to whom you can express your concern and still receive the protection of the Act. In general, the more public the disclosure the greater the restrictions on employees.

However, to make a disclosure to the Royal Borough or a member of the School Leadership (as your employer), you only need to act in good faith i.e. with an honest belief about the concern you raise. Through their policies and practice, the School and Council actively promotes you to raise concerns internally.

## 4. What other Concerns can be Reported

As well as the areas outlined above in section 3, all staff of the school should also report the following using this procedure:

- Unauthorised use of public funds
- Financial malpractice, fraud and corruption
- Abuse of students, parents or carers
- Any conduct likely to damage the school's reputation
- Breach of the school's internal procedures, including the Code of Conduct for staff
- Unauthorised disclosure of confidential information
- Negligence
- Other unethical conduct, including any attempt to cover up any of the above being committed.

The School's Child Protection and Safeguarding procedures provide a clear routeway for reporting and communicating any concerns relating to the welfare and care of any child in the school's care. This includes a route for reporting concerns to authorities outside the school.

## Safeguards

It is vital that all staff report where they suspect malpractice or fraudulent activity and that they do so in the knowledge that there will be no negative repercussions for them for doing so. This procedure has the following safeguards in place to ensure this:

- The decision to report a concern can be a difficult one to make. If concerns are raised in good faith, 'whistleblowers' who raise matters of concern are protected from harassment, victimisation and disciplinary action.
- It staff which raise a concern in confidence that can be done so under this procedure. The school will take every step it can to protect the identity of employees who raise a serious concern and do not want their identity to be disclosed. In some instances it may not be possible to resolve the concern without revealing the identity of the whistleblower. If this is the case the employee will be advised of how the investigation will proceed.
- If a whistleblower is required to give evidence in a criminal or disciplinary proceeding then the school will arrange for them to receive advise and support.

## How to Raise a Concern

The following ladder provides the clear pathway through which staff can raise any concerns:

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| Immediate Line Manager | The school would hope that the staff can raise any concerns with their immediate line manager who will then report it to their SLT lead or the Executive Head Teacher. |
| Head Teacher | If the matter is of such serious concern, or a member of staff feels their line manager has not addressed the concern, then they should contact the Executive Head Teacher. |
| Chair of Governors | If the matter concerns the Executive Head Teacher, or the member of staff feels that having raised with the Head the matters has not be adequately addressed then they should contact the Chair Of Governors |
| External Disclosure | If the matter concerns the Chair of Governors or the employee feels it is of such seriousness then they should report their concern to the Director of Children's Services, the Chief Executive or to Royal Greenwich's Internal Audit and Anti-Fraud department: |

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| | Internal Audit and Anti-Fraud<br>3rd Floor Woolwich Centre<br>35 Wellington Street SE18 6HQ<br>Tel: 020 8921 5239<br><br>Email: fraud@greenwich.gov.uk<br>Confidential Hotline: **0800-169-6975** (24 hour service) |

The Federation hopes that staff will feel able to voice whistleblowing concerns openly under this policy. However, if a member of staff wants to raise his or her concern confidentially, the federation will endeavour to keep his or her identity secret in so far as it is possible to do so when following this policy and procedure.

The Federation does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if the school cannot obtain further information. It is also more difficult to establish whether any allegations are credible and have been made in good faith. 'Whistleblower's who are concerned about possible reprisals if their identity is revealed should come forward to one of the contacts listed above and appropriate measures can then be taken to preserve confidentiality.

If an individual misuses the policy and procedure e.g. by making malicious or repeated unsubstantiated complaints against colleagues this could give rise to action under the Disciplinary Procedure. If the Executive Head Teacher knows or has a suspicion that an employee comes into this category then they will seek advice from the Chair of Governors and Schools' HR. If after investigation it is found that an employee has made an allegation for an ulterior motive, then disciplinary action will be taken against them which could result in dismissal.

## School Procedure for Handling a Concern

The action taken by the federation will depend on the nature of the concerns raised. The matters raised normally be investigated internally by the school, but if the case is of a more serious nature then the concerns may be referred to a regulatory body or the Police in criminal matters.

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| Acknowledgement | The school either through the line manager, the Executive Head Teacher or the Chair of Governors will acknowledge receipt of the concern in writing within 10 working days of the disclosure, provide a summary of the concerns, and outline how it proposes to deal with the matter. |
| Initial Enquiries | In order to protect employees, the School and those accused of possible malpractice, initial enquiries will be made to ascertain whether an investigation is appropriate, and if so what form it should take. In some instances immediate action will be possible without the need for a full investigation, eg repairs that may present a Health and Safety Risk. |

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| Formal Investigation | An investigating officer will be appointed. This person will be of sufficient seniority but also have sufficient distance from the possible issue so as to avoid a conflict of interest. The investigating officer will keep the employee who has raised the concern up to date with the progress of the investigation, and will report to the senior leader in the school, a panel of three governors, or to the senior manager outside the school, on their findings. |

Whilst the Federation cannot always guarantee the outcome a particular member of staff is seeking, the Federation will try to deal with the concern fairly and in an appropriate way. If a member of staff is not happy with the way in which his or her concern has been handled, he or she can raise it with one of the other key contacts outlined above.

There are no rights of appeal against any decisions taken under this procedure. However, an employee or the Executive Head Teacher will have the right to refer any particular case to the Designated Governor for review.

Any member of staff raising a concern under the procedure will be kept informed of progress by the Executive Head Teacher, including, where appropriate, the final outcome. However, in certain circumstances, e.g. where disciplinary action under the School's Disciplinary Procedure has resulted from the concern, it may not be appropriate to provide specific details due to the confidentiality and sensitivity of such matters

**APPENDIX A**

**WHISTLEBLOWING POLICY**

GUIDANCE FOR MANAGERS ON RESPONDING TO A MATTER OF CONCERN RAISED BY AN EMPLOYEE

1. School Managers should ensure that employees are aware of the Whistleblowing Policy and know where it can be located.

2. If you receive a disclosure in respect of any of the matters set out under Sections 3 and 4 in this Whistleblowing Policy you must take the following action:

- take the matter seriously and do not dismiss or belittle the information,
- Ask for evidence and make a secure record of any evidence submitted

Respect as far as possible the confidentiality of the employee, and adhere to the policy under the heading “Safeguards” where the employee has specifically asked for confidentiality, and follow the procedure under the heading “School Procedure for Handling a Concern”

- Ensure that the employee understands the Whistleblowing procedure.
- Acknowledge the concern in writing within 10 working days.
- Discuss ways that the employee could be supported.
- School Leaders will then investigate the concern objectively, dealing with all parties with sensitivity and tact.
- Seek advice from the Head Teacher.
- Seek advice and involve other School managers if appropriate.
- Set out clearly how the concern is to be taken forward.
- Ensure that notes are made and kept of the process followed, notes of discussions etc.
- Keep informed the person raising the concern about the progress made and outcome of the investigation.
- Provide the Head Teacher with details of the concern and inform him/her about the progress and outcome of the investigations.

3. If at the conclusion of your investigations you are of the view that the concern was raised falsely or maliciously, seek further advice from the Head Teacher.

4. Note that if the concern relates to fraud, you should report it in line with this policy .

**APPENDIX B**

**GUIDANCE FOR STAFF**

Plumstead Manor School
Success • Harmony • Excellence • Just

**Don't think what if I'm wrong – think what if I'm right**

**Reasons for whistle blowing:**

- Each individual has a responsibility for raising concerns about unacceptable practice or behaviour.
- To prevent the problem worsening or widening.
- To protect or reduce risks to others.
- To prevent becoming implicated yourself.

**How to raise a concern:**

- You should voice your concerns, suspicions or uneasiness as soon as you feel you can. The earlier a concern is expressed the easier and sooner action can be taken.
- Try to pinpoint exactly what practice is concerning you and why.
- Approach your immediate line manager, Head Teacher, or the Designated Child Safeguarding Officer.
- If your concern is about your Head Teacher, you should report it to the Chair of Governors, or if you feel you need to take it to someone outside the school contact The Local Authority
- Make sure you get a satisfactory response – don't let matters rest.
- You should then put your concerns in writing, outlining the background and history, giving names, dates and places where you can.
- A member of staff is not expected to prove the truth of an allegation but will need to demonstrate sufficient grounds for the concern.

**What happens next?**

You should be given information on the nature and progress of any enquiries. Your employer has a responsibility to protect you from harassment or victimisation.

No action will be taken against you if the concern proves to be unfounded and was raised in good faith.

Allegations made frivolously, maliciously or for personal gain will be seen in a different light and disciplinary action may be taken.

## Further advice and support

It is recognised that whistle blowing can be difficult and stressful. Advice and support is available from your line manager, HR department and/or your professional trade union.