POLICY DOCUMENT

Stratford-upon-Avon School is a company limited by guarantee, registered in England and Wales under number 7690776, whose registered office is Stratford-upon-Avon School, Alcester Road, Stratford-upon-Avon, Warwickshire CV37 9DH

Policy Title	WHISTLEBLOWING POLICY
Policy Reference	**SUAS.F.1306.WHI01**

DISCLOSABLE UNDER FREEDOM OF INFORMATION ACT 2000	Yes / No	No
TO BE PUBLISHED ON WEBSITE	Yes / No	Yes

POLICY OWNERSHIP	
Governor Committee:	Resources
Department responsible:	Human Resources
Post-holder: *(Title and Name)*	Jennifer McCormick HR and Training Manager
LINKED PROCEDURES REF:	
Responsible Person - Procedures	

POLICY IMPLEMENTATION DATE:	March 2017 revised December 2019
PLANNED REVIEW INTERVAL:	3 Years
PLANNED NEXT REVIEW DATE:	December 2022

Stratford-upon-Avon School welcomes comments and suggestions from the public and staff about the contents and implementation of this policy. Please write to the Compliance Manager at the school address or email your comment to policy@stratfordschool.co.uk.

i. POLICY OUTLINE

The Whistleblowing Policy outlines the schools approach to dealing with staff concerns about work related malpractice.

ii. PURPOSE

It provides all staff with a simple, fair and confidential process for reporting serious concerns about practice within the school.

iii. IMPLICATIONS OF POLICY

Compliance with the requirements laid out in this policy will ensure the school meets its' statutory obligations as an employer. Failure to follow this policy or deal with issues of malpractice could have legal, moral and financial implications for the school and impacting on the school's reputation.

iv. EQUALITY ANALYSIS

Every policy will be subject of an Equality Analysis (EA) completed by the policy writer, which should be circulated to all those being consulted, with the draft policy.

v. CONSULTATION

Consultation will be with all staff prior to presentation for approval by the Governing Body (Resources Committee).

vi. PROCEDURE

Procedure is the method by which the strategic intent of the policy is realised, and is thus an 'instruction manual' on how the policy outcome is to be achieved.
The procedure which supports this policy is an independent document, for internal use by Academy staff. The procedure reference is shown on the Policy Identification Page.
The development or amendment of the procedure is at a tactical / operational level. There is therefore no necessity for active referral to the Governing Body ***unless*** *the policy intent has been altered.*
If there is significant change to the procedure element of the policy there may be a requirement to engage in the consultation process and refer to the Governing Body.

vii. RELATED POLICIES AND PROCEDURES

- ***Disciplinary Procedure***
- ***Capability Procedure***
- ***Child Protection and Safeguarding Policy***
- ***Staff Behaviour Policy/Code of Conduct***
- ***Managing Allegations Against Staff and Volunteers Policy***
- ***Anti-Corruption and Bribery Policy***

viii. DOCUMENT HISTORY

The policy will be subject to regular review once ratified by the Governing Body.
The history of the policy will be recorded using the chart following:

Date	***Author /Reviewer***	***Amendment(s)***	***Approval/ adoption date***
17.6.2013	*JMC/Rickerby's*		
26.09.2016	*JMC*		
21.03.2017	*SMG*		
09.12.19	*AMa*	*Chairs specific email included for confidentiality of emails sent*	*09-12-19 Resources Committee*

STRATFORD UPON AVON SCHOOL
WHISTLEBLOWING POLICY

INTRODUCTION

The policy and the accompanying procedure on whistleblowing enables members of staff to raise concerns internally and in a confidential fashion about malpractice.

Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of conduct, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety, safeguarding or the environment. Examples of malpractice in a school environment might include inappropriate use of school funds, concerns about staff relationships with students or witnessing a staff member failing to safely store dangerous substances.

The policy also provides if necessary, for such concerns to be raised outside the organisation. The school is committed to tackling wrong doing and this policy is intended to encourage and enable staff to raise legitimate and genuine concerns in order that they can be properly and quickly investigated.

SCOPE

This policy applies to all members of staff and other workers, including agency staff members and independent contractors.

All types of malpractice are covered whether they are faults in the School systems or procedures or acts committed by fellow staff members.

This procedure is separate from the School's adopted procedures regarding grievances. You should not use the whistleblowing procedure to raise grievances about your personal employment situation.

PURPOSE OF THE POLICY

The School's policy on whistleblowing is intended to encourage reporting of malpractice so staff know concerns will be treated seriously and to demonstrate that the School:

- Will not tolerate malpractice;
- Respects the confidentiality of employees raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- Will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- Will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff;
- Will invoke the School's disciplinary policy and procedure in the case of false, malicious, vexatious or frivolous allegations.

HOW TO REPORT A CONCERN

If you have a concern you should report it in a timely manner to allow for the appropriate investigations to take place. If the matter of concern relates to the Headmaster or the Strategic Business Director you should raise your issue with the Chair of Governors.

At this stage you should indicate if you wish to remain anonymous or raise the matter in confidentiality.

If the staff member has any interests in the matter of concern they should declare this when they raise their concern.

Once the concern has been raised they will be investigated in a timely manner, and appropriate corrective action will be pursued. The member of staff making the allegation will be kept informed of progress and, whenever possible and subject to third party rights, will be informed of the resolution.

THE PROCESS

STAGE 1

Procedure: You should disclose the suspected malpractoce first to your Head of Department / Line Manager. In the event that your Head of Department / Line Manager is involved in the suspected wrongdoing, you shall be entitled to proceed directly to Stage Two of this procedure.

Response: You can expect a response detailing to whom the disclosure has been notified or any action taken within 14 working days (dependent on School holidays) of your Head of Department / Line Manager becoming aware of the disclosure.

STAGE 2

Procedure: If no response is forthcoming after 14 working days (dependent on School holidays) or if your Head of Department / Line Manager is involved in the suspected wrongdoing you shall be entitled to notify the Head Master or Strategic Business Director, as appropriate.

Response: You can expect a response detailing any action taken within 14 working days (dependent on School holidays) of the Head Master or Strategic Business Director becoming aware of the disclosure.

STAGE 3

Procedure: If no response is forthcoming 14 working days (dependent on School holidays) you should inform the Chair of Governors of the disclosure.

Please note that if the disclosure made requires significant lengthy investigation the School reserves the right to provide a response outside the timescales given above. You will be kept notified of this during the investigation.

STAGE 4

Outside Body:

Where all internal procedures have been exhausted or if you have not received a response from stage 3, you shall have a right of access to the Department for Education. It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where you may be entitled to raise a concern directly with an external body where you reasonably believe:-

- That exceptionally serious circumstances justify it;
- That the School would conceal or destroy the relevant evidence;
- If you believe you would be victimised by the School;
- Where the Secretary of State has ordered it.

The appropriate body outside the School may include but is not limited to:

- the Local Authority Designated Officer;
- Children's Social Care;
- the NSPCC Whistleblowing Helpline;
- the Health and Safety Executive;

- the Environment Agency;
- the Department for Education (DfE);
- the Police;
- the Channel Police Practitioner; or
- the Office for Standards in Education, Children's Services and Skills (Ofsted).

NSPCC

If your concern relates to a child protection of safeguarding matter you may wish to use the NSPCC Whistleblowing Advice Line 0800 028 0285 or email at help@nspcc.org.uk. The NSPCC Whistleblowing Advice Line offers free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation. If you think an organisation is putting children at risk, even if you're not certain, call the NSPCC to talk through your concerns.

BYPASSING THE PROCEDURE

In extreme circumstances you will have the right to raise your concern directly with a relevant and appropriate outside body without first having followed the stages above. Note that this may however cause damage to the School and its reputation as well as constitute a breach of your own duty of confidentiality towards the School and this action should only be taken in extreme circumstances and after careful thought.

THE MEDIA

Even where extreme circumstances are thought to exist, you should under no circumstances approach a commercial body or the media with details of the suspected wrongdoing. If you approach any such body and / or where your concern is disclosed for personal gain, the School may consider this to be gross misconduct and immediate disciplinary action may be taken against you.

CONFIDENTIALITY

The school will do its best to protect your identity when you raise a concern and do not want your name to be disclosed. However, it must be appreciated that the investigation process may reveal the source of the information and a statement by you may be required as part of the evidence, especially if the next step is a police investigation and prosecution, or there is a need for the whistleblower to act as a witness.

MISUSE OF THIS PROCEDURE

It is a very serious matter to raise a concern which a staff member knows to be false or which is made in bad faith or maliciously. Such action may amount to gross misconduct and may result in disciplinary action under the School's disciplinary policy.

PROTECTION FROM REPRISAL OR VICTIMISATION

The School takes all concerns raised under this policy seriously and will ensure they are handled fairly. You will not suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that you do so in good faith and following these procedures.

THE CHAIR OF GOVERNORS CAN BE CONTACTED BY E-MAIL ON jprice@stratfordschool.co.uk