



WHISTLEBLOWING POLICY

Review date: January 2024

Introduction

Bradford Girls' Grammar School (BGGs) is committed to the highest possible standards of openness, probity and accountability in all of its activities. It also expects a high standard of conduct and integrity from employees. Any employee who has a serious concern about any aspect of the school's work or the actions of any of its employees should voice their concerns through established internal channels, without fear of harassment or victimisation.

What Is Whistle Blowing?

Most people will have heard of 'whistle-blowing' from recent high-profile cases reported in the media. Some helpful definitions include:

- 'raising concerns about misconduct within an organisation or within an independent structure associated with it' (Nolan Committee on Standards in Public Life).
- 'bringing an activity to a sharp conclusion as if by the blast of a whistle' (Oxford English Dictionary).
- 'giving information (usually to the authorities) about illegal and underhand practices' (Chambers Dictionary).

Purpose

The Public Interest Disclosure Act 1998 provides employees with statutory protection against victimisation or dismissal should they reasonably and in good faith report concerns or 'blow the whistle'. The legislation does not provide a general protection for whistle-blowers, but applies to those who follow the procedures laid down in the legislation in disclosing specific categories of malpractice.

The purpose of this policy is to:

- encourage employees to feel confident in raising concerns and to question and act upon their concerns
- provide avenues for employees to raise these concerns and receive feedback on any action taken
- allow employees to take the matter further if they are dissatisfied with the school's response
- reassure employees they will be protected from reprisals or victimisation for whistle blowing in good faith

This policy applies to all employees including those working on a temporary or casual basis and is intended to cover reasonably serious concerns that fall outside the scope of other procedures. Concerns may be about any of the following:

- a criminal conviction that has been, is being or is likely to be committed
- fraud and corruption
- unauthorised use of public funds
- a failure to comply with a legal obligation
- a health and safety risk relating to any individual
- a child protection risk that has not been reported to Children's Social Care Services
- a miscarriage of justice
- a damage to the environment
- actions that are contrary to any of the school's policies
- actions or behaviour that falls below established standards of practice
- abuse and welfare of pupils or staff
- harassment or victimisation of pupils or staff
- any actions or concerns regarding practice that could result in a financial loss to the school
- deliberate concealment of information relating to any of the above matters
- Other unethical conduct

Keeping Children Safe in Education statutory guidance (2018) states that all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

Note: there are alternate procedures in place to allow staff to lodge a grievance relating to their own employment.

Procedure

Where concerns are raised the following procedures should be followed:

- as soon as an employee becomes reasonably concerned about a matter, they should first raise the issue with their line manager unless the disclosure concerns them, in which case the employee should inform the Principal
- all managers have a responsibility to act on the concerns raised, in accordance with this procedure. Failure to do so in accordance with school policy and procedure may lead to disciplinary action
- concerns may be raised verbally or in writing and should give the background, the nature of the malpractice that is alleged; relevant dates where possible; the reasons for the concern and the names of individuals against whom the allegations are made
- if a concern is raised verbally, the person receiving the information should put an outline of the matters raised in writing which should then be confirmed in writing to the employee within ten working days
- where a concern is raised with a line manager, the line manager should report the matter on to the Principal who will appoint a member of the SLT to investigate
- if the matter is dealt with under the Whistleblowing Policy then the employee will be informed of the name of the investigating member of the SLT however in consideration of the nature of the disclosure the Principal may appoint an independent external investigator to look into the matter instead
- the Principal will also inform any employee against whom allegations are made of the nature of the allegation. This will normally be done in writing within ten working days.

Handling a Disclosure

The Principal is responsible for deciding whether there are grounds for proceeding further with a case. Potential action that could be taken includes; a clarification of the facts, a more formal investigation or the employee may be advised that the matter is better dealt with under another policy. In addition some matters could:

- be further investigated by the Principal or an appropriate member of the SLT
- be referred to the police
- be referred to external auditors
- form the subject of an independent inquiry by an outside body

based on the results of an investigation the Principal will determine how the matter will be dealt with and within four weeks of a concern being raised the Principal will write to both parties:

- indicating how the school proposes to deal with the matter and where an internal investigation is to take place giving an estimate of how long it will take to provide a full response
- indicating whether further investigations will take place and if not, why not

Any internal investigation should take no longer than three months to complete from the date of receipt of original disclosure. As part of the investigation, the Principal will decide:

- whether disciplinary action be taken against any employee
- whether changes should be recommended to any BGGGS policy and/or procedures
- whether any other action should be recommended

The outcome of any investigations will be detailed in a final report and the Principal will provide a response in writing to the employee who made the disclosure as soon as possible after the completion of the investigation. This response will include the outcome of any investigation and what action if any is to be taken. However it should be noted that precise details may not be given where there are legal constraints or it would infringe a duty of confidence owed by us to someone else or where there are business reasons for not doing so.

The individual who is subject to the disclosure will also be informed of the outcome in writing and what action if any is to be taken as soon as possible after completion of the investigation.

Principal

Disclosures involving the Principal should be raised with the Chair of Governors so that:

- the Chair of Governors may appoint an investigating officer from the governing body and/or an independent investigator where appropriate to consider allegations and whether there are grounds for proceeding
- any decision to proceed with disclosures concerning the Principal will be made by the Chair of Governors

- disclosures concerning a member of the Senior Leadership Team [SLT] should be raised with the Principal

Appeal

An employee who raises a concern and is not satisfied with the outcome or action proposed may appeal against the decision in writing within five days of receipt of the outcome letter. The Principal will determine who should hear the appeal which should be completed within one month.

Any employee subject to action arising from a whistleblowing disclosure will be able to make representations to the Principal within five days about the outcome of the report. The Principal will consider these representations and may direct further investigation or review as appropriate.

Anonymous Allegations

This policy encourages employees to put their name to an allegation and will support individuals in doing so unless there is a particular set of circumstances that make this especially difficult.

Anonymous concerns are harder to investigate and substantiate without the 'whistle-blower's open evidence but nevertheless you are encouraged to raise your concerns and be assured that they will be taken seriously. Factors we would take into account would include:

- the seriousness of the issues you have raised
- the credibility of your concern
- the likelihood of confirmation of the allegation from attributable sources

BGGS will do its best to protect an individual's identity when a concern is raised and will not disclose identity without consent. However it must be appreciated that the investigation process may reveal the source of the information and a statement may be required as part of any evidence gathered particularly if the police, courts or external agencies become involved. In order to take effective action BGGS will need robust evidence which may be required to stand up to examination in courts or tribunals but this will always be discussed with the individual first.

Untrue Allegations

If an allegation is made in good faith and is genuinely believed to have foundation no action will be taken against the employee if the allegation is not confirmed by the investigation. If however malicious or vexatious allegations are made for no other purpose than to cause trouble, for personal gain or to discredit BGGS or another member of staff; an investigation will take place to determine whether disciplinary or other appropriate action should be taken.

Other whistleblowing channels

Under KCSIE statutory guidance, any staff member who feels unable to raise an issue with school or feels that their genuine concerns are not being addressed should be provided with links to other whistleblowing channels.

General advice can be found by consulting the Government website, by searching 'Advice on whistleblowing.'

BGGS staff can also contact Lead Officer Education Safeguarding Team on 01274 437043 or email kate.hopton@bradford.gov.uk

Alternatively staff may wish to contact the NSPCC whistleblowing helpline on 0800 028 0285 – the line is available from 08:00am until 20:00pm Monday to Friday, or by email: help@nspcc.org.uk

If the issue involves the harm of, or potential harm of a child, then the member of staff must call Children's Social Services themselves on **01274 435600**. Safeguarding and promoting the welfare of children is everyone's responsibility.

WHISTLEBLOWING POLICY TIMELINE



ASPIRE • SUCCEED • LEAD

**BRADFORD GIRLS'
GRAMMAR SCHOOL**

Co-educational up to 11, Girls only 11-16

Action	Timescale	By Who
Written acknowledgement of disclosure submitted in writing or received verbally - with an outline of process to be followed	Within 10 working days	Principal
Confirm in writing to the person complained of that a disclosure has been received and that it is being considered. Outline the process to be followed	Within 10 working days	Principal
Confirmation of whether the matter is to be investigated, and if so, how it will be investigated Letters sent to employee and person complained of	Within four weeks of receipt of disclosure	Principal
Written confirmation of outcome of investigation and action to be taken. Report sent to Principal recommendations and determines what action to take. Letters sent to employee and person complained of	Within three months of receipt of disclosure	Principal and Person appointed to investigate
Appeal against outcome of investigation	Within five working days from receipt of outcome	Employee who makes the disclosure
Appeal carried out	Within one month of appeal	Principal
Appeal to Principal	Within five working days from receipt of outcome	Employee subject to the disclosure

Policy updated: January 2023