

**Queen's College London**  
**Queen's College Preparatory School**  
(including Early Years Foundation Stage)



**Whistleblowing policy**

**Reviewed September 2017**  
**Next review July 2018**

## **1 Introduction**

Queen's College and Queen's College Prep School (hereafter 'the School') have adopted this policy and the accompanying procedure on whistleblowing to enable members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations, inappropriate behaviour or unethical conduct in the workplace. The policy also provides if necessary, for such concerns to be raised outside the organisation.

Employment legislation governs the making of disclosures concerning workplace activities and is intended to protect employees who blow the whistle on bad practice from being subjected to any detriment or from being unfairly dismissed as a result. This procedure is available to all employees who discover something they feel that they should pass on in the interests of the public. All types of wrongdoing are included whether they are acts committed by fellow employees, faults in School procedures or oversights which should be rectified. The procedure should be used even in the event that the act or omission causing you concern has finished or has not yet started.

## **2 Safeguarding**

Nothing within this policy is intended to prevent staff from complying with their statutory obligations in accordance with *Keeping Children Safe in Education* (DfE, September 2016).

## **3 Elements of the Policy**

The School's policy on whistleblowing is intended to demonstrate that the School :-

- Will not tolerate malpractice;
- Respects the confidentiality of staff 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 invoke the School's disciplinary policy and procedure in the case of false, malicious, vexatious or frivolous allegations;
- Will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

## **4 Scope**

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

This procedure is to enable members of staff to express a legitimate concern regarding suspected malpractice within the School.

Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of ethics, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as those outlined in section 7 below.

## **5 Confidentiality**

Individuals who wish to raise a concern under this procedure are entitled to have the matter treated confidentially and their name will not be disclosed to the alleged perpetrator of malpractice without their prior approval. It may be appropriate to preserve confidentiality that concerns are raised orally rather than in writing, although members of staff are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity then the Police will in all cases be informed.

## **6 Procedure**

A member of staff will be at liberty to express their concern to the Principal, Headmistress, Senior Tutor, Deputy Head (QCPS) or the Bursar.

Any concern raised will be investigated thoroughly and 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.

A member of staff who is not satisfied that their concern is being properly dealt with will have a right to raise it in confidence with the Council of Queen's College, London.

## **7 External Procedures**

Where all internal procedures have been exhausted, a member of staff shall have a right of access to an external person/body. This may include (depending on the subject matter of the disclosure):

- 1.4 the Local Authority Designated Officer;
- 1.5 Children's Social Care;
- 1.6 the Health and Safety Executive;
- 1.7 the Environment Agency;
- 1.8 the Information Commissioner;
- 1.9 the Department for Education (DfE);
- 1.10 the Department for Business, Enterprise and Regulatory Reform;
- 1.11 the Police;
- 1.12 the Charity Commission;
- 1.13 the Independent Schools Inspectorate (ISI);
- 1.14 the Office for Standards in Education, Children's Services and Skills (Ofsted).

## **8 Bypassing the procedure**

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

## **9 Extreme circumstances:**

The School will consider extreme circumstances exist where the member of staff concerned has a reasonable belief that:

- the School will subject them to detriment if they inform the Principal, Headmistress, Senior Tutor, Deputy Head (QCPS) or the Bursar;
- the School would conceal or destroy the relevant evidence;
- a disclosure made previously in accordance with the stages above has not prompted a satisfactory response; or
- the Secretary of State has ordered it

## **10 The media**

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

## **11 Malicious Accusations**

False, malicious, vexatious or frivolous accusations will be dealt with under the School's Disciplinary Procedure.

## **12 Protection from Reprisal or Victimisation**

No member of staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and following the Whistleblowing policy.

## APPENDIX

NSPCC contact details.

The NSPCC have a specific Whistleblowing Advice Line for professionals who are worried about how child protection issues are being handled in their own or another organisation. The number of the Advice Line is **0800 028 0285**. It can also be contacted via [help@nspcc.org.uk](mailto:help@nspcc.org.uk).