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Whistleblowing Policy (Whole School)	7 b
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Responsible for Initiating Review of Policy	Director of Finance and Operations
Committee to Review	SLT
Last Review Date	August 2022
Review Period	2 years (annual update if required)
Approved by (Committee and Date)	SLT August 2022
Approved by Board of Governors	Autum 2022
Effective Date of Policy	September 2022
Next Review Date	September 2024
Related Policies	7a Safeguarding Policy 7f Whole School Pastoral Care 7i Confidentiality Policy 9a Behaviour Policy 11g Use of Mobile Phones by Staff 18a Safer Recruitment Policy 32c ICT Acceptable Use Policy – Staff 32e Use of Social Networking Sites 32f Use of Email and Internet at Work 32g Use of Privately Owned Devices Staff Code of Conduct



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WHISTLEBLOWING

The concept of whistleblowing is a key part of the structures and procedures that ensure the safeguarding, welfare, health and safety of all members of the school community. In this context the School has full regard to Keeping Children Safe in Education – September 2023 (KCSIE Sept 23) In particular, this policy is intended to address safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors. The policy has been updated to add clarity on the process for sharing low-level concerns and should be read alongside the school's safeguarding policy.

Policy

- The School is committed to the highest standards of openness, integrity and accountability for all of its staff and students.
- In line with this commitment, the school encourages anyone with any concerns about any aspect of the school's activities to come forward and voice those concerns.
- This applies equally to concerns about safety, the activities of students, staff and anyone else in their dealings with the school.
- All members of the school community are valued highly and we encourage reflection on all aspects of our practice.

The procedures associated with this policy:

- Provide the basis on which individuals can raise any such concerns they may have, and receive feedback on action taken.
- Allows individuals to take any matter raised further if they are dissatisfied with the School's response.
- Gives protection from reprisals or victimisation for 'whistleblowing' in good faith.
- This policy applies to all members of the School community.

Procedures

There are existing procedures in place to enable students, staff and parents to make complaints about individual and particular matters. (See Complaints Procedure).

These procedures are intended to cover concerns that fall outside the scope of individual complaints.

The concern may be about something that:

- is unlawful;
- is against the policies of the School;
- amounts to improper conduct;



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- seems likely to harm somebody or the environment;
- represents a cover-up of these sorts of issues.

However, the school encourages all members of the school community to raise any concerns that they have, no matter how minor they may appear to be, so that action may be taken to ensure that issues do not escalate. The School values all members of the school community equally highly and is committed to ensuring reflective practice at all times.

Safeguards:

Low-level Concerns – (also see 7a Safeguarding)

Some concerns or allegations may not meet the harm threshold. However, in order to create an open and transparent culture of safeguarding in the school, staff are encouraged to pass on any concerns they may have about all adults working with children, no matter how small, and even if no more than something causing a sense of unease or 'nagging doubt' that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work;
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- using inappropriate sexualised, intimidating, humiliating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial these 'low level concerns' are reported. They will be recorded, dealt with effectively and sensitively, and should also protect those working in or on behalf of the school from potential false allegations or misunderstandings. If the concern has been raised by a third party, the Head will collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously, and to the individual involved and any witnesses. Staff should also feel confident to self-refer, where, for example, they have found themselves in a situation which could be



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misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Staff code of conduct, whistleblowing and behaviour policies are designed to achieve the following:

- to ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- to ensure that staff feel empowered to share any low-level safeguarding concerns
- to address unprofessional behaviour and supporting the individual to correct it at an early stage
- to handle and respond to such concerns sensitively and proportionately when they are raised, and
- to help identify any weakness in the school's safeguarding system.

The school will take the following actions in relation to low level concerns and/or allegations which do not meet the 'harm' threshold:

- All low-level concerns will be recorded in writing.
- The record will include details of the concern, the context in which the concern arose, the investigation(s) carried out and action taken. The name of the individual sharing their concerns should also be noted; if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
- The information collected will help to categorise the type of behaviour and determine what further action may need to be taken.
- These records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- As part of the annual review of safeguarding, these records will be reviewed at least annually so that potential patterns of concerning, problematic or inappropriate behaviour can be identified – which will be addressed either through the school's disciplinary procedures or (where a pattern of behaviour moves from a concern to meeting the harms threshold) after referral to the LADO.
- Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur. Amendments to policies and training will be considered to minimise the risk of it happening again.
- Reports about supply staff and contractors will be notified to their employer so that any potential patterns of inappropriate behaviour can be identified.
- Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding, and not to misconduct or poor performance, should not be referred to in a reference.



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- When appropriate, follow-up conversations will take place with the relevant member of staff. The Head has overall responsibility for handling concerns about staff, but in accordance with the local safeguarding guidance, may delegate follow-up conversations to the DSL or Designated Safeguarding Governor.

Harassment or victimisation

- The School recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisals from those responsible for the malpractice. The school will not tolerate harassment or victimisation and will take all possible measures to protect individuals who raise concerns in good faith.

Confidentiality

- The School will protect the identity of individuals who raise concerns and do not want their name to be disclosed. It must be appreciated, however, that the investigation may reveal the source of the information, and statements made by the individuals who raised the issue may be required as part of the evidence. The School encourages individuals to put their name to allegations made. Concerns expressed anonymously will be considered at the discretion of the School. In exercising this discretion, the factors to be taken account of will include:
 - ~ the seriousness of the issue raised;
 - ~ the credibility of the concern;
 - ~ the likelihood of confirming the allegation from attributable sources.

Untrue allegations

- If an allegation is made in good faith, but is not confirmed by the investigation, no action will be taken against the individual. However, if individuals make allegations that are malicious or vexatious, disciplinary action is likely.

How to raise a concern

- The sooner individuals express their concern the easier it is to take action.
- As a first step:
 - A pupil should normally raise concerns with their form Tutor, Class Teacher, DSL or with the Deputy Head of Preparatory School or Assistant Head Pastoral and Boarding; in some situations, it could be raised with the Head depending on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. Students who feel that they cannot



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approach management in the school should approach the school's Independent Listener.

- An employee should normally raise concerns with the Head however if these relate to the Head then they should be raised directly with the Chair of Governors. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. Employees who feel that they cannot approach management in the school should approach the Chair of Governors.
- Concerns can be raised verbally but are better raised in writing
 - This should set out the background and history of the concern, giving names, dates and places where possible, and the reason why the employee is concerned about the situation.

How will the school respond?

- The action taken by the School will depend on the nature of the concern. The matters raised may for example:
 - be investigated internally;
 - be referred to external agencies.

The Head or appropriate member of School staff will respond in writing to the individual who raised the issue within 10 working days of a concern being received.

When any meeting is arranged with the individual, they will be given the right to be accompanied by a friend, work colleague or union representative who is not involved in the incident to which the concern relates.

The School accepts that individuals need to be assured that the matter has been properly addressed. Therefore, subject to any legal or contractual constraints and the necessary timespan to investigate the issue thoroughly, individuals will receive information about the outcomes of any investigations.

Taking the issue further

- This policy is intended to provide individuals with an avenue to raise relevant concerns within the School. If an individual is not satisfied, and feels it is right to take the matter further, the following are possible contact points, some or all of which may be appropriate
- For students:
 - the school's Independent Listener
 - Chair of the Board of Governors



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- For employees
 - relevant professional bodies or regulatory organisations
 - Chair of the Board of Governors
 - the Police
 - the charity: Protect (formerly Public Concern At Work - telephone 020 3117 2520).