



F&P4: WHISTLEBLOWING POLICY

RATIONALE

1. The staff and governors of The Commonweal School seek to run all aspects of school business and activity with full regard for high standards of conduct and integrity. In the event that members of school staff, parents, governors or the school community at large become aware of activities which give cause for concern, The Commonweal School has established the following whistleblowing policy, or code of practice, which acts as a framework to allow concerns to be raised confidentially and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion.

DEFINITION

2. Throughout this policy, the term *whistleblower* denotes the person raising the concern or making the complaint. It is not meant in a pejorative sense and is entirely consistent with the terminology used by Lord Nolan as recommended in the Second Report of the Committee on Standards in Public Life: Local Spending Bodies published in May 1996.

GUIDELINES

3. The Commonweal School is committed to tackling any form of malpractice and treats these issues seriously. The Commonweal School recognises that some concerns may be extremely sensitive and has therefore developed a system which allows for the confidential raising of concerns within the school environment, but also has recourse to an external party outside the management structure of the school.
4. The Commonweal School is committed to creating a climate of trust and openness so that a person who has a genuine concern or suspicion can raise that matter with full confidence that the matter will be appropriately considered and resolved.
5. The provisions of this policy apply to concerns about something that:
 - Is unlawful, or
 - Is contrary to the school's policies, or
 - Falls below established standards of practice; or
 - Amounts to improper conduct
6. The policy does not relate to matters of more general grievance which would be dealt with under the School's grievance procedures.
7. The type of activity or behaviour which the School considers should be dealt with under this policy includes, but is not limited to:
 - malpractice or ill treatment of a student, member of staff, visitor or other customer
 - manipulation of accounting records and finances

- breach of Financial Regulations or school policies relating to control of finances
 - disregard for legislation, particularly in relation to health and safety at work
 - decision-making for personal gain
 - showing undue favour over a contractual matter or to a job applicant
 - any criminal activity
 - a breach of any code of conduct or protocol
 - fraud and deceit
 - serious breaches of school procedures which may advantage a particular party (for example tampering with tender documentation, failure to register a personal interest)
 - information on any of the above has been, is being, or is likely to be concealed
8. The School encourages the whistleblower to raise the matter internally in the first instance to allow those school staff and governors in positions of responsibility and authority the opportunity to right the wrong and give an explanation for the behaviour or activity.
 9. The School has designated a number of individuals to specifically deal with such matters and the whistleblower is invited to decide which of those individuals would be the most appropriate person to deal with the matter. The matter may be raised with the Chair of Governors (gov.jbakker@commonweal.co.uk), the Headteacher (head@commonweal.co.uk) or the Business Manager (jsear@commonweal.co.uk).
 10. The whistleblower may prefer to raise the matter in person, by telephone or in written form marked private and confidential and addressed to one of the individuals named. All matters will be treated in strict confidence and anonymity will be respected wherever possible. Staff should however be encouraged to put their name to their allegation; concerns expressed anonymously will still be considered but will be less powerful.
 11. If the whistleblower considers the matter too serious or sensitive to rise within the internal environment of the school, the matter should be directed to Department for Education (DfE) which has its own procedures for dealing with such matters. The DfE can be contacted by following the link www.gov.uk/contact-dfe
 12. External channels may also be used where a complaint has previously been raised with management, or additionally whenever the employee believes in good faith that action is unlikely to be taken if the usual channels are used.
 13. The individual(s) in receipt of the information or allegation (the investigating officer/s) will carry out a preliminary investigation. This will seek to establish the facts of the matter and assess whether the concern has foundation and can be resolved internally. The initial assessment may identify the need to involve third parties to provide further information, advice or assistance, for example involvement of other members of school staff, the school's external auditors, legal or personnel advisors, the police, the DfE or the Education and Skills Funding Agency (ESFA).
 14. Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer/s, possibly in conjunction with the Governing Body, will consider how best to report the findings and what corrective action needs to be taken. This may include some form of disciplinary action or third party referral such as the police.

15. Where possible, the whistleblower will be informed of the results of the investigation and the action taken to address the matter. Depending on the nature of the concern or allegation and whether or not it has been substantiated, the outcome of the matter will be reported to the Governing Body and may be referred to the DfE or ESFA.
16. If the whistleblower is dissatisfied with the conduct of the investigation or resolution of the matter or has genuine concerns that the matter has not been handled appropriately, the concerns should be raised with the investigating officer/s, the Governing Body and/or directed to the DfE or ESFA.
17. Wherever possible The Commonweal School seeks to respect the confidentiality and anonymity of the whistleblower and will as far as possible protect him/her from reprisals. The School will not tolerate any attempt to victimise the whistleblower or attempts to prevent concerns being raised and will consider any necessary disciplinary or corrective action appropriate to the circumstances.
18. Individuals are encouraged to come forward in good faith with genuine concerns with the knowledge that they will be taken seriously. If individuals raise malicious unfounded concerns or attempt to make mischief, this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances.

CONCLUSION

19. Existing good practice within The Commonweal School in terms of its systems of internal control both financial and non-financial and the external regulatory environment in which the school operates ensure that cases of suspected fraud or impropriety rarely occur.
20. The whistleblowing policy is provided as a reference document to establish a framework within which issues can be raised confidentially internally and if necessary, outside the management structure of the school.
21. This document is a public commitment that concerns are taken seriously and will be actioned.

MONITORING AND REVIEW

22. The Finance & Planning Committee will monitor this policy on a three yearly basis and review in February 2025.