



Tormead Family

Whistleblowing Policy

This policy applies to the whole school

Tormead Limited ("Tormead") includes two schools:

- Tormead School, which includes the Prep and Senior Schools ("Tormead")
- Rydes Hill, which includes the Nursery and Pre Prep ("Rydes Hill")

Introduction

- 1 This policy does not form part of any contract of employment or other contract to provide services, and the School may amend it or depart from it at any time.
- 2 The School is committed to establishing a culture of safety and raising concerns. The following policy outlines our procedures for raising and handling certain concerns, including those relating to poor or unsafe practice, potential failures in the School's safeguarding regime, and provision for mediation and dispute resolution where necessary. Our aim is to create a culture of transparency and accountability in relation to how concerns are received and handled.
- 3 **Honesty and integrity:** The School is committed to conducting its business with honesty and integrity, and we expect all staff to maintain high standards in accordance with the Code of Conduct. All organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

- 4 This policy applies to all employees (whether permanent, temporary, casual, part-time, or on fixed-term contracts) and to individuals such as agency staff, consultants, interns, governors, and volunteers who are not our employees but who work at or for the School.
- 5 **Purpose:** The purpose of this policy is to:
 - 5.1 encourage employees to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
 - 5.2 provide employees with guidance as to how to raise those concerns; and
 - 5.3 reassure employees that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

Wrongdoing at work

- 6 **Whistleblowing:** Whistleblowing is the disclosure of information in the public interest which relates to suspected wrongdoing or dangers at work. This may include:
 - 6.1 criminal activity;
 - 6.2 failure to comply with any legal or professional obligation or regulatory requirements, including in relation to safeguarding;
 - 6.3 miscarriages of justice;
 - 6.4 danger to health and safety;
 - 6.5 damage to the environment; bribery;
 - 6.6 financial fraud or mismanagement;
 - 6.7 breach of our internal policies and procedures;
 - 6.8 conduct likely to damage our reputation or financial wellbeing;
 - 6.9 other unlawful or unethical conduct in the workplace;
 - 6.10 damage to the environment;
 - 6.11 danger to the health and safety of any individual; and
 - 6.12 the deliberate concealment of any of the above matters.
- 7 **Whistleblower:** A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.
- 8 **Grievances:** This procedure should not be used where you have a complaint relating to your personal circumstances in the workplace. The Grievance Procedure should be used in such cases.
- 9 **Advice:** If you are uncertain whether something is within the scope of this policy you should seek advice from the Head / Director of Finance & Operations or another appropriate senior member of staff, the Designated Safeguarding Lead, Public Concern at Work or the NSPCC whistleblowing helpline as appropriate.
- 10 **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). In particular:
 - 10.1 **Safeguarding Policy:** You should raise any initial safeguarding concerns about a child with the Designated Safeguarding Lead in accordance with the School's Safeguarding Policy.
 - 10.2 **Safeguarding - member of staff:** You should raise any concerns about another staff member with the Head, or if the concern is about the Head, with the Chair

- of Governors (without first notifying the Head).
- 10.3 **Whistleblowing Policy:** You should follow this procedure to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or staff to properly safeguard the welfare of pupils if you are concerned that the School's child protection and safeguarding policy and procedures are not being followed correctly.
- 11 **Referral:** If a child is in immediate danger or is at risk of harm a referral should be made to Children's Social Care and / or the Police immediately. Anyone can make a referral.

Confidentiality

- 12 **Confidentiality:** We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make reasonable efforts to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will seek to discuss this with you.
- 13 **Anonymous disclosures:** We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

Raising a concern

- 14 **Procedure:** Save where paragraph 9 applies, we hope that in many cases you will be able to raise any concerns with your Head of Department or Line Manager. If you are not satisfied with the way in which your concern has been handled or if your Head of Department / Line Manager is involved in the suspected wrongdoing you should notify the Head or the Director of Finance & Operations, as appropriate.
- 15 **Response:** We will arrange a meeting with you to discuss your concern as soon as reasonably possible after becoming aware of the disclosure. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. We will also aim to give you an indication of how we propose to deal with the matter.
- 16 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.
- 17 Where appropriate, we will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 18 If we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

Protection for Whistleblowers

- 19 The School aims to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

- 20 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Head, Director of Finance & Operations, or another appropriate senior member of staff immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.
- 21 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.
- 22 However, if the School concludes that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

Relevant external reporting

- 23 **Outside body:** The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. The law recognises that in some circumstances it may be appropriate for you to report your concerns to a relevant outside body including:
 - 23.1 the local authority's Designated Officer;
 - 23.2 Children's Social Care;
 - 23.3 the NSPCC;
 - 23.4 the Health and Safety Executive;
 - 23.5 the Environment Agency;
 - 23.6 the Information Commissioner;
 - 23.7 the Department for Education;
 - 23.8 the Department for Business, Energy and Industrial Strategy;
 - 23.9 the Police;
 - 23.10 the Charity Commission;
 - 23.11 the Independent Schools Inspectorate;
 - 23.12 the Office for Standards in Education, Children's Services and Skills (**Ofsted**); or
 - 23.13 the Channel Police Practitioner
- 24 **Advice:** Staff are strongly encouraged to seek advice before reporting a concern to anyone external. In most cases you should not find it necessary to alert anyone external but before you do, as well as considering the internal help and support available which is identified above, please seek external advice from:
 - 24.1 **Public Concern at Work:** If you have any concerns about disclosing a suspected wrongdoing the independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. Staff can call 020 7404 6609 for advice.
 - 24.2 **NSPCC:** The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8.00 am to 8.00 pm Monday to Friday) or email help@nspcc.org.uk.
- 25 **Queries:** If you have any queries about this procedure you should contact the Head or the Director of Finance & Operations.