



Whistle-blowing Policy

Date reviewed: June 2018
Next review date: June 2019
Staff resp. for review: CE

Introduction

The staff and governors of Norbury Manor Business and Enterprise College seek to run all aspects of college 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, Norbury Manor has established the following whistle-blowing policy 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.

Throughout this policy, the term whistle-blower 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.

Norbury Manor is committed to tackling fraud and other forms of malpractice and treats these issues seriously. Norbury Manor recognises that some concerns may be extremely sensitive and has therefore developed a system which allows for the confidential raising of concerns within the college environment but also has recourse to an external party outside the management structure of the college.

Norbury Manor is committed to creating a climate of trust and openness so that a person who has a genuine concern or suspicion can raise the matter with full confidence that the matter will be appropriately considered and resolved.

The provisions of this policy apply to matters of suspected fraud and impropriety and not matters of more general grievance which would be dealt with under the Norbury Manor grievance procedures.

When might the whistle-blowing policy apply?

The type of activity or behaviour which Norbury Manor considers should be dealt with under this policy includes:

Manipulation of accounting records and finances

Inappropriate use of school assets or funds

Decision-making for personal gain

Any criminal activity

Abuse of position

Fraud and deceit

A data breach

Serious breaches of school procedures which may advantage a particular party (for example tampering with tender documentation, failure to register a personal interest)

What action should the whistle-blower take?

Norbury Manor encourages the whistle-blower to raise the matter internally in the first instance to allow those school staff and governors in positions of responsibility and authority to investigate the matter.

Norbury Manor has designated a number of individuals to specifically deal with such matters and the whistle-blower is invited to decide which of those individuals would be the most appropriate person to deal with the matter.

Position	Name	Contact details
Headteacher	Amanda Compton	020 8679 0062 ext. 210
Chair of Governors	Mary Turner	07852 625559
Vice-Chair of Governors	Jane Chandler	jchandler14.306@lgfl.org.uk
Deputy Headteacher	Chris Evans/ Tracey Scarsbrook	0208679 0062 ext. 217/240
Business Manager	Winnie Kinnon	0208679 0062 ext. 241
Data Protection Officer	A Ryder Owen	0208679 0062 ext. 234

The whistle-blower may prefer to raise the matter in person or in written form (including email) marked private and confidential and addressed to one of the above named individuals. All matters will be treated in strict confidence and anonymity will be respected wherever possible.

Although we prefer you not to take your concerns to someone outside the school without first going through these internal procedures, there may be a good reason for doing so. For example, you may not be happy with the conclusions of the manager. Other reasons could be that senior managers are involved, or there are serious health and safety issues or possible discrimination.

The external sources which could be used are:

- Children’s social care services (if the matter is about child protection or safeguarding issues)
- Police
- Health & Safety Executive
- Audit Commission
- Local Citizens Advice Bureau
- Relevant professional bodies or regulatory organisations
- Department for Education
- OfSTED
- The Information Commissioner’s Office (ICO)

In addition information and advice can be obtained from the charity Public Concern at Work. This charity offers free legal advice in certain circumstances to people concerned about serious malpractice at work. Their literature states that matters are handled in strict confidence and without obligation.

Contact details for the charity are as follows:

Public Concern at Work
Suite 301
16 Baldwins Gardens
London
EC1N 7RJ

Telephone number: 020 7404 6609

Website: www.pcaw.org.uk/

How will the matter be progressed?

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, legal or personnel advisors, the police or the Department for Education.

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.

The whistle-blower 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 matter will be reported to the governing body who will decide what other third parties should be informed. e.g. Police.

If the whistle-blower 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 or an external body.

Respecting confidentiality

Individuals are encouraged to come forward in good faith with genuine concerns with the knowledge 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

Existing good practice within Norbury Manor in terms of its systems of internal control both financial and non-financial and the external regulatory environment in which the school operates minimises the risk of suspected fraud or impropriety that can occur. This whistle-blowing 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. This document is a public commitment that concerns are taken seriously and will be actioned.

The Governing Body will review the policy at least every two years to assess its progress and performance. All staff and people working within the school will be made aware of the policy.

Procedure: how to raise a concern

You should first raise your concern with your line manager, supervisor or the Headteacher. You can do this in writing or by talking to them about it. You have the right to ask for the matter to be treated confidentially.

If your concerns involve your line manager or supervisor, you should approach someone from the Senior Leadership Team or Headteacher.

If you feel unable to discuss the matter with your line manager or the Headteacher, you can take it directly to the Chair of Governors. If this is this case, you will be asked to justify why you feel unable to raise your concerns in the normal way. If the Chair of the Governing Body is allegedly involved in the malpractice, a senior manager should be contacted.

If you feel you might be victimised, or there might be a cover-up, or your concerns are being ignored, you may feel unable to raise the issue with staff at school. In these cases, you should contact another senior manager if the case involves possible child abuse. You should contact HR for any other issues. If, at any stage, you feel your concerns are not being dealt with properly, you should move on to the next stage. You must put your concerns in writing within 48 hours at each stage.

If you are not sure what to do, or you want independent advice at any stage, you can contact the independent charity Public Concern at Work on 020 7404 6609 or visit their web site at www.pcaw.co.uk.