



St Paul's School  
FOUNDED 1509

# St Paul's School & St Paul's Juniors Whistleblowing Code

Owner:	Director of HR	Date of last review:	06/25
Reviewed by:	DSL	Date of authorisation:	06/25
Authorised by:	Core Strategy Group	Date of next review:	06/26
Applicable:	SPJ & SPS		

This policy is available on the Handbook page of the School Intranet and policies page of the School website and can be made available in large print or other accessible format if required; such requests can be made by email to [policyquery@stpaulsschool.org.uk](mailto:policyquery@stpaulsschool.org.uk)

## Contents

1. About the Code.....	2
2. Scope of the Code.....	2
3. Confidentiality and Anonymity .....	3
4. Raising a Whistleblowing Claim.....	3
4.1. Children's Welfare & Safeguarding Concerns .....	3
4.2. All Other Concerns.....	4
5. Protection for Reprisal or Victimisation .....	5
6. Malicious Accusations .....	5
7. External Disclosures .....	5
8. Contact Details.....	6

## About the Code

- 1.1. The School is committed to promoting a culture of safety and of raising concerns. This code is intended to provide transparency and accountability in relation to how concerns are received and handled. Staff will receive whistleblowing training as part of their induction and will be provided with ongoing access to the code via the School's Staff Handbook intranet page.
- 1.2. **'Whistleblowing'** means the reporting of suspected wrongdoing or dangers in relation to the school's activities. The aim of this code is to encourage staff (which includes the High Master, Head, all Governors, teaching and support staff, including temporary staff, and all volunteers who do not fall under visitor procedures, hereafter 'staff') who have genuine concerns about any aspect of the School's work, including poor, inappropriate or unsafe workplace practice, including unacceptable conduct and attitudes towards children, to raise those concerns promptly. The School is committed to dealing with all genuine concerns raised appropriately, openly, responsibly and professionally.
- 1.3. A **'whistleblower'** is a person who raises a genuine concern relating to the school's activities. If you have any genuine concerns relating to suspected wrongdoing or dangers in relation to the school's activities (a whistleblowing concern), you should report it under this procedure.
- 1.4. This code is part of a portfolio of documents providing guidance to staff where concerns exist about the conduct of those involved with the School. These documents may be found in the Integrated Safeguarding Portfolio section of the Staff Handbook on the intranet.
- 1.5. The primary area of concern relates to children's welfare and safeguarding. In such cases this document should be read in conjunction with the Safeguarding and Child Protection Policy (S&CPP), which lists further sources of advice and guidance.
- 1.6. This code is non-contractual and does not form part of any staff member's terms and conditions of employment. The School may also amend this policy from time to time.
- 1.7. The School aims to follow the best practice principles set out by ACAS.

## 2. Scope of the Code

- 2.1. In general, whistleblowing concerns the disclosure of information which relates to suspected wrongdoing or dangers at work. Where the concerns relate to children's welfare and safeguarding (see below), staff should also be aware of and follow the guidance set out in the S&CPP.
- 2.2. This code may be used by anyone employed by the School in a paid or voluntary capacity who believes they have reason to suspect that one or more person(s) involved with the school might have committed:
  - A crime or other unlawful act or miscarriage of justice;
  - A discriminatory act or other substantive breach of the School's Equal Opportunities Policy;
  - A substantive breach of the School's Health and Safety Policy;
  - Damage to the environment or property;

- Unauthorised use of School funds or other fraud;
- A failure to comply with legal obligations;
- Inappropriate behaviour or unethical conduct;
- Any other act constituting possible gross misconduct (see the School's Disciplinary Procedure) or a breach of any other internal policies and procedures;
- Unauthorised disclosure of confidential information;
- Conduct likely to damage the School's reputation, including when using social media;
- Inappropriate or harmful conduct towards a child (or children), including but not confined to:
  - Bullying, humiliation, or any other kind of abuse (See Appendix 1 of S&CPP);
  - Contravening health and safety guidelines in place to protect children;
  - Serious breaches of the school's Staff Code of Conduct;
  - Professional practice that falls short of normally accepted standards; or
  - Compromising pupils' welfare but in a way that does not meet the threshold for child protection intervention;
- The deliberate or attempted concealing of any of the above.

The list above is intended to be indicative rather than exhaustive; there may be evidence of other kinds of behaviour not explicitly outlined above which justifies whistleblowing.

- 2.3. This code should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance procedure. If you are uncertain whether something is within the scope of this procedure, you should first seek advice from the Director of HR.

### **3. Confidentiality and Anonymity**

- 3.1. In terms of children's welfare and safeguarding, the principles of confidentiality are laid out in the S&CPP. Child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that any information released into the public domain does not compromise evidence.
- 3.2. In other whistleblowing cases, all concerns will be treated in confidence. During the process of investigating the matter, every effort will be made to keep the identity of the employee raising the concern unknown, except to the minimum number of individuals practicable. Absolute confidentiality cannot be guaranteed in all eventualities.
- 3.3. If there is evidence of criminal activity, the Police will be informed in all cases.
- 3.4. We hope that you will feel able to voice whistleblowing concerns openly under this procedure. However, staff may raise concerns anonymously or request that their identity is known only to the individual whom they have reported to. Such instances will still be investigated; however, it must be recognised that such a degree of anonymity could hinder the investigation and that in certain situations (such as court or criminal proceedings) anonymity cannot be maintained.

### **4. Raising a Whistleblowing Claim**

#### **4.1. Children's Welfare & Safeguarding Concerns**

- 4.1.1. If the concern is in the realm of children's welfare and safeguarding, staff should follow the

procedures laid out in the Child Protection and Safeguarding Policy.

4.1.2. The Child Protection and Safeguarding Policy indicates that all allegations, complaints, concerns or suspicions against staff or volunteers at St Paul's Juniors, including any made against the Designated Safeguarding Lead (DSL), or a Deputy DSL, should be reported directly to the Head, or in their absence, to the High Master, or in their absence to the Chairman of Governors, unless that person is the subject of the concern.

4.1.3. All allegations, complaints, concerns or suspicions against staff or volunteers at St Paul's including any made against the DSL or a Deputy DSL and the Head of the Junior School, should be reported directly to the High Master, or, in their absence, to the Chairman of Governors, unless that person is the subject of the concern. Those about the High Master or a member of the Governing Body should be reported to the Chairman of Governors (or in their absence, the Vice Chairman), without the High Master being informed.

4.1.4. The High Master, Head or Chairman of Governors (or Vice Chairman), as appropriate, (the 'case manager') will inform the LADO if the allegation meets the harm threshold.

4.1.5. All allegations, complaints, concerns or suspicions about the Chairman of Governors should be reported to the LADO without the Chair of Governors being informed. The LADO may choose to appoint a 'case manager'.

4.1.6. Where the matter includes concerns about a child, the case manager will also inform the Designated Safeguarding Lead (DSL), or if the DSL is the subject of the allegation, a Deputy DSL (in accordance with KCSIE).

4.1.7. If at any point, there is a risk of immediate or serious harm to a child a referral should be made to Children's Social Care immediately (see Section 8: Contact Details). Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for reconsideration. Concerns should always lead to help for the child at some point.

## **4.2. All Other Concerns**

4.2.1. All other concerns e.g. fraud, misconduct or health & safety may be addressed to the relevant line manager or Head of Department in the first instance. If there are concerns about doing so, or about the process of any investigation once raised, staff should follow the School's reporting hierarchy above.

4.3. Timescales will depend on the complexity of the initial inquiry, but feedback should be provided normally within 5 working days and an investigating manager will be allocated. The investigating manager will respond to you in writing, acknowledging that the concern has been received and outlining how the matter is proposed to be dealt with. We may then arrange a meeting with you to discuss the concern. You may bring a work colleague or Trade Union representative to any meetings held under this procedure, although companions must respect the confidentiality of disclosures and any subsequent investigations.

4.4. Following on from an initial review of the concern that has been received, a decision will be made by the High Master as to whether the matter requires further investigation.

- the investigation may involve you and other individuals involved giving a written statement;
  - any investigation will be carried out in accordance with the principles set out above. Your statement will be considered, and you will be asked to comment on any additional evidence obtained;
  - you may be asked to attend a meeting (or further meetings) to provide further information;
  - the investigation manager will then report to the High Master, who will take any necessary action, including reporting the matter to any appropriate government department or regulatory agency;
  - if disciplinary action is required, the investigating manager will report the matter to the Director of HR who will consider next steps in line with the School's Disciplinary Policy.
- 4.5. The amount of feedback you will receive relating to the issue will vary depending on the nature and result of the investigations. Sometimes the need for confidentiality may prevent us giving specific details of the investigation or any disciplinary action taken as a result. However, where possible and subject to third party rights, you will be kept informed of the progress and eventual conclusion of investigations. You should treat any information about the investigation as confidential.

All serious incidents, as defined by the Charity Commission, will be reported by the Chair of Governors (or Vice Chair) to the Charity Commission in accordance with its guidance.

## **5. Protection for Reprisal or Victimisation**

- 5.1. The School recognises that the decision to report a concern is a difficult one to make. At all stages during any ensuing investigation, this will be considered. 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.
- 5.2. The Public Interest Disclosure Act 1998 protects whistleblowers from detrimental treatment or dismissal as a result of raising a genuine concern. We will take whatever action is necessary to protect the employee who has raised a genuine concern. If you believe you have suffered any such treatment, you should inform the Director of HR immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.
- 5.3. You must not threaten or retaliate against whistleblowers in any way. Any such behaviour, or any direct or indirect harassment or victimisation will not be tolerated and may result in disciplinary procedures against those concerned.

## **6. Malicious Accusations**

- 6.1. If the School concludes that a whistleblower has made false, malicious, vexatious or frivolous accusations, the whistleblower may be subject to disciplinary action under the School's Disciplinary Procedure.

## **7. External Disclosures**

- 7.1. The aim of this procedure 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.

7.2. However, if all internal procedures have been exhausted, you shall have a right of access to an external person/body. This may include (depending on the subject matter of the disclosure) HMRC, the Audit Commission, the Health & Safety Executive and/or the LADO (where the disclosure relates to a child protection issue).

7.3. The law recognises that in some instances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external.

7.4. Protect operates a confidential helpline. Their contact details are set out below.

**Protect (Independent whistleblowing charity):**

Helpline: 0203 117 2520

Contact Advice Line [here](#)

Email: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)

**8. Contact Details**

Name	Position	Contact Details
Sally-Anne Huang	High Master	020 8746 5405 <a href="mailto:hmpa@stpaulsschool.org.uk">hmpa@stpaulsschool.org.uk</a>
Krishna Manuel	Director of HR	<a href="mailto:km@stpaulsschool.org.uk">km@stpaulsschool.org.uk</a>
Nick Hudson	Designated Safeguarding Lead (DSL) and overall lead safeguarding practitioner	<a href="mailto:nch@stpaulsschool.org.uk">nch@stpaulsschool.org.uk</a>
Becky McGreevy	Deputy Head (Staff Development and Wellbeing)	<a href="mailto:rmg@stpaulsschool.org.uk">rmg@stpaulsschool.org.uk</a>
Clare Kelly	Safeguarding Co-ordinator	<a href="mailto:safeguarding@stpaulsschool.org.uk">safeguarding@stpaulsschool.org.uk</a>
Oliver Snowball	Head of Junior School	
Nick Arnold	DSL Junior School	<a href="mailto:na@stpaulsschool.org.uk">na@stpaulsschool.org.uk</a> .
Richard Cassell	Governor: Chairman	<a href="mailto:cassellr@stpaulsschool.org.uk">cassellr@stpaulsschool.org.uk</a>
Ali Palmer	Governor: Vice Chair	<a href="mailto:palmera@stpaulsschool.org.uk">palmera@stpaulsschool.org.uk</a>
Veryan Exelby	Safeguarding Governor	<a href="mailto:exelbyv@stpaulsschool.org.uk">exelbyv@stpaulsschool.org.uk</a>
	All DSLs and Governors can be contacted on a Single Point of Access Number:	020 8746 5353

Local Authority Designated Officer (LADO) and Children's Social Care (CSC) Services	The LADO is responsible for co-ordinating the response on behalf of Richmond Local Authority to allegations of a safeguarding nature made against a member of School staff.	<ul style="list-style-type: none"> <li>Working hours: 020 8547 5008</li> <li>Emergency &amp; out of hours: 020 8770 5000</li> <li>Email: <a href="mailto:LADO@achievingforchildren.org.uk">LADO@achievingforchildren.org.uk</a></li> </ul>
---	---	--

Charity Commission		<p>Whistleblowing: 0800 055 7214 or E-mail: <a href="mailto:whistleblowing@charitycommission.gov.uk">whistleblowing@charitycommission.gov.uk</a></p> <p>Guidance is available online  <a href="http://www.charitycommission.gov.uk/how-to-complain/complain-about-a-charity/guidance-for-employees/">http://www.charitycommission.gov.uk/how-to-complain/complain-about-a-charity/guidance-for-employees/</a></p> <p>General inquiries can be made via:  <a href="https://www.gov.uk/government/organisations/charity-commission#org-contacts">https://www.gov.uk/government/organisations/charity-commission#org-contacts</a></p>
NSPCC	The NSPCC whistleblowing advice line offers free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation.	<p>Tel: 0800 028 0285  Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p>
Secretary of State for Education	You can contact the Secretary of State for Education about matters relating to any independent (or maintained) school in England	<p>Ministerial and Public Communications Division  Department for Education  Piccadilly Gate  Store Street  Manchester  M1 2WD</p> <p>Tel: 0370 000 2288  Website: <a href="http://www.gov.uk/contact-dfe">www.gov.uk/contact-dfe</a></p>
Her Majesty's Chief Inspector of Education, Children's Services and Skills	Contact them about matters relating to the welfare of children provided with accommodation by boarding schools.	<p>The Chief Inspector  Ofsted  Piccadilly Gate  Store Street  Manchester  M1 2WD</p> <p>Tele: 0300 123 3155  Email: <a href="mailto:whistleblowing@ofsted.gov.uk">whistleblowing@ofsted.gov.uk</a></p>
The Health and Safety Executive	Contact them about:  The industries and work activities for which the Health and Safety Executive is the enforcing authority under the	<p>Tel: 0300 790 6787  Online form:  <a href="http://www.hse.gov.uk/contact/concerns.htm">www.hse.gov.uk/contact/concerns.htm</a></p>

	<p>Health and Safety (Enforcing Authority) Regulations 1998.</p> <p>The health and safety of individuals at work, or the health and safety of the public arising out of or in connection with the activities of persons at work.</p>	
The Information Commissioner	Contact them about compliance with the requirement of legislation relating to data protection and to freedom of information.	<p>The Information Commissioner's Office  Wycliffe House  Water Lane  Wilmslow  SK9 5AF  Tele: 0303 123 1113  Website: <a href="http://www.ico.org.uk">www.ico.org.uk</a></p>
Further Advice	<p>The government provides advice on whistleblowing at <a href="https://www.gov.uk/whistleblowing">https://www.gov.uk/whistleblowing</a></p> <p>Alternatively, advice may be available from unions or professional associations, a solicitor, the police, children's social care or Protect.</p>	