



THE KING'S SCHOOL  
CHESTER

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## Whistleblowing Policy

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Circulation	School website, all staff and governors
Linked Policies	Child Protection and Safeguarding Policy Health and Safety Employee Handbook Safer Recruitment Policy Staff Disciplinary Procedure ( <i>see Staff Handbook</i> )
ISI Regulatory Requirements and any relevant legislation	<b>Part 3</b> Paragraph 16(a) and (b) <b>Schedule 10</b> Section 26 <b>Part 4</b> Keeping Children Safe in Education (2020), Working Together to Safeguard Children (2018)

Contents

1. Introduction ..... 3

2. Scope of the Policy ..... 3

3. Safeguards ..... 4

4. Procedure for Making a Disclosure ..... 4

## 1. Introduction

The staff and Governors of The King's School seek to run all aspects of School business and activities with full regard to the highest standards of conduct and integrity. The School is committed to tackling fraud and other forms of malpractice and treats these issues seriously.

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 School has developed a 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.

Individuals are encouraged to come forward with genuine concerns which they reasonably believe to be in the public interest with the knowledge they will be taken seriously.

The provisions of this policy apply to matters of suspected fraud and impropriety and not of more general matters which would be dealt with under School grievance procedures. The policy is also not designed to allow questioning of financial or business decisions taken by the School nor may it be used to reconsider any matters which have already been addressed under complaint or disciplinary procedures.

## 2. Scope of the Policy

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

- a. financial malpractice or impropriety or fraud
- b. failure to comply with a legal obligation
- c. dangers to health and safety of the environment
- d. criminal activity
- e. miscarriage of justice
- f. academic malpractice
- g. improper conduct or unethical behaviour
- h. poor and unsafe practices
- i. failures in the school's safeguarding
- j. attempts to conceal any of the above.

This is not intended to be a comprehensive list and any matters raised under this policy will be considered seriously.

### 3. Safeguards

This policy is designed to offer protection to those employees or other members of the School who disclose such concerns provided the disclosure is made:

- a. in accordance with the procedures laid down
- b. in the belief that disclosure is in the public interest and in the reasonable belief of the individual making the disclosure that it tends to show malpractice.

The School will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate the investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure (the whistleblower) may need to provide a statement as part of the evidence provided.

### 4. Procedure for Making a Disclosure

#### 4.1 Initial Step

The individual should make the disclosure either to the Director of Finance and Operations or the Headmaster. If the individual considers the matter too serious or sensitive to raise within the internal environment of the School, the matter should be raised with the Chairman of Governors. The individual may raise the matter in person, by telephone, by email or in written form marked private and confidential and addressed to one of the named individuals.

#### 4.2 Initial Response

In all cases, the person to whom the concern has been raised (the investigating officer) should acknowledge its receipt in writing to the whistleblower at his/her home address.

The investigating officer will make 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 e.g. School staff, legal advisors or the police. This preliminary investigation will normally be completed within 3 working weeks.

Records will be kept of work undertaken and actions taken throughout the investigation.

#### 4.3 Outcome

If on preliminary examination, the concern is judged to be without substance or merit, it will be dismissed.

If it is judged that a prima facie case may exist, the matter will normally will be dealt with in accordance with the School's discipline procedure or as otherwise may be deemed appropriate according to the nature of the case.

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.

The whistleblower will be informed of the results of the investigation and the action taken to address the matter. If the whistleblower is dissatisfied with the conduct of the investigation or resolution of the matter, the concerns should be raised with the investigating officer or the Governing Body. Wherever possible, the School seeks to respect the confidentiality and anonymity of the whistleblower and as far as possible will 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. This policy is not contractual.