



SEVENOAKS
PREPARATORY SCHOOL

WHISTLE BLOWING POLICY 2024 2025

Status and Review Cycle	Statutory / Annual
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WHISTLEBLOWING

The School has adopted this policy and the accompanying procedure on whistle blowing to enable members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations, inappropriate behaviour or unethical conduct. The policy also provides, if necessary, for such concerns to be raised outside the organisation.

Elements of the Policy

The School is committed to conducting its business with honesty and integrity, and expects all staff to maintain high standards. However, 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.

The School's policy on whistle blowing is intended to demonstrate that the School:

- will not tolerate malpractice
- respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively
- will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate
- will invoke the School's disciplinary policy and procedure in the case of false, malicious, vexatious or frivolous allegations
- will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff

The School values the culture of safety and raising concerns as well as a culture of valuing staff and of reflective practice. Employees will be regularly trained and supported in how the procedure works.

Whistleblowing Procedure

A Whistleblower is a person who raises a genuine concern related to suspected malpractice within the School. If you have any genuine concerns related to suspected malpractice affecting any of the School's activities (a whistleblowing concern) you should report it under this procedure.

This procedure is separate from the School's adopted procedures regarding grievances. Employees should not use the whistleblowing procedure to raise grievances about their personal employment situation. This procedure is to enable members of staff to express a legitimate concern regarding suspected malpractice within the School.

Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of ethics, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment.

The procedure should also be used if employees believe there are potential failures in the School's safeguarding regime, including poor or unsafe practice.

Confidentiality

Employees who wish to raise a concern under this procedure are entitled to have the matter treated confidentially and their name will not be disclosed to the alleged perpetrator of malpractice without their prior approval. It may be appropriate to preserve confidentiality that concerns are raised orally rather than in writing, although members of staff are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity then the Police will, in all cases, be informed.

The Investigation

A member of staff will be at liberty to express their concern to the Head, Head of the Pre-Prep, Deputy Head or the Bursar.

In the case of a concern relating to the Head this should be addressed to the Chair of Governors.

A meeting will be arranged with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this procedure. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. You may be required to attend additional meetings in order to provide further information as the concerns raised are investigated.

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The member of staff making the allegation will be kept informed of progress and, whenever possible and subject to third party rights, will be informed of the resolution.

A member of staff who is not satisfied that their concern is being properly dealt with will have a right to raise it in confidence with the Governors.

External Procedures

Where all internal procedures have been exhausted, a member of staff shall have a right of access to the Governors or an appropriate external body. This may include (depending on the subject matter of the disclosure) HMRC, the Audit Commission, the Health and Safety Executive and/or the Local Authority Designated Officer (where the disclosure relates to a child protection issue).

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the employee reasonably believes:

- that exceptionally serious circumstances justify it
- that the School would conceal or destroy the relevant evidence
- where they believe they would be victimised by the School
- where the Secretary of State has ordered it

Malicious Accusations

False, malicious, vexatious or frivolous accusations will be dealt with under the School's Disciplinary Procedure.

Protection from Reprisal or Victimisation

No member of the staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and following the Whistle blowing procedures.

