

Oaks Park High School

Title of Policy: Whistle-blowing

Person responsible: A Giardelli

Date for review: 2017

Introduction

The staff and governors of Oaks Park High School seek to run all aspects of the school business and activities with full regard for high standards of conduct and integrity. In the event that members of the school staff, parents/carers, governors or the school community at large become aware of activities which give cause for concern, the school 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.

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

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 schools' grievance procedures.

When might this policy apply?

The type of activity or behaviour which 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;
- serious breach of school procedure which may advantage a particular party - ie. tampering with tender documentation; failure to register a personal business interest.

What action should the whistle-blower take?

The school encourages the whistle-blower to raise the matter internally in the first instance, to allow school staff and governors in positions of responsibility and authority the opportunity to put things right and provide an explanation for the behaviour or activity.

The school has designated individuals who specifically deal with such matters and the whistle-blower is invited to decide which of these would be the most appropriate person to deal with the matter:

- Ms A Giardelli Business Manager
- Ms J Hamill Headteacher
- Mr P Lupton Chair of Governors

What action should the whistle-blower take? (cont.)

The whistle-blower may prefer to raise the matter in person, by telephone or in written form marked 'private and confidential' and addressed to the chosen individual. All matters will be treated in strict confidence and anonymity respected, wherever possible.

Alternatively, if the whistle-blower considers the matter too serious or sensitive to raise within the school environment the matter should, in the first instance, be directed to:

For financial concerns: Mr A Perry, 020 8708 3384
LEA Chief Internal Auditor Internal: 83130
Email: alan.perry@redbridge.gov.uk

For other concerns: Mrs M Keddy, 020 8708 3974
LEA Chief Personnel Officer Internal: 83974
Email: marge.keddy@redbridge.gov.uk

The school would prefer that a serious concern is raised responsibly rather than not at all. Despite all assurances, the whistle-blower may feel that it is more appropriate to raise a concern with an external organisation, such as a regulator. It is, of course, open to them to do so provided they have sufficient evidence to support the concern. The school strongly advises that before reporting the concern externally, the whistle-blower seeks advice from one of the following:

- **Public Concern at Work** - a registered charity which advises on serious malpractice within the workplace. Contact number: 020 7404 6609.
- **The Audit Commission**, "Prescribed Persons" under the Public Interest Disclosure Act, have set up an Anti-Fraud and Corruption Unit. Contact number: 020 7630 1019.

How will the matter progress?

The individual(s) in receipt of the information or allegation 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 the school staff, legal or personnel advisors, the police and the LEA.

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 upon the nature of the concern or allegation and whether or not it has been substantiated, the matter will be reported to the Governing Body and the LEA.

The LEA has its own procedures for dealing with such matters and will ensure every effort to respect the confidentiality of the whistle-blower. If the whistle-blower is not satisfied with the outcome of an investigation, the school would prefer that the whistle-blower raises this with them or the LEA, explaining their reasons. The concern will be looked at again if there is good reason to do so.

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 and/or directed to the LEA.

Respecting confidentiality

Wherever possible the school seeks to respect the confidentiality and anonymity of the whistle-blower and will, as far as possible, protect him/her from reprisals. The school will not tolerate any attempt to victimise the whistle-blower or prevent concerns being raised and will consider any necessary disciplinary or corrective action as appropriate. The Public Interest Disclosure Act became law in 1999 and gives a 'worker' the right not to be victimised or dismissed because he/she has made a protected disclosure.

Raising unfounded malicious concerns

Individuals are encouraged to come forward with genuine concerns in good faith and with the knowledge that 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 the school in terms of its systems of internal control, both financial and non-financial and the external regulatory environment in which the school operates, ensures that cases of suspected fraud or impropriety rarely occur. This policy is provided as a reference document to establish a framework within which issues can be raised confidentially, both internally and if necessary, outside of the management structure of the school. This document is a public commitment that all concerns will be taken seriously and action taken as necessary.