

St David's College

— Est. 1965 —

WHISTLE BLOWING POLICY

Whistle Blowing

Date	Review Date	Monitoring	Coordinator	Nominated Governor
25/3/26	25/3/27	Annually to the Main Board	Nicola McDonald	Helen Moore

The legal definition of whistle blowing is the reporting of suspected wrongdoing in the workplace which is regarded as making a disclosure in the public interest. We actively encourage all school personnel and visitors to school to report any serious concerns they may have about any aspect of the school such as:

- health and safety concerns
- damage to the school environment
- a criminal offence that has taken place or is about to take place
- disobeying the law
- the covering up of a wrong doing
- the conduct of its personnel or others acting on behalf of the school.
    - reports that sexual harassment that has occurred, is occurring or is likely to occur; and
    - the deliberate concealment of any of the above matters.

We believe school personnel, supply staff, and students on work experience are protected by law if they make a disclosure on any of the above, that is if they think what they are reporting is true, that they think they are telling the right person and if they believe their disclosure is in the public interest.

Whilst the reporting of sexual harassment that has occurred, is occurring or is likely to occur (whether as a witness or victim) will amount to a protected disclosure for the purposes of whistleblower protection provided the report is made in the public interest, such complaints / reports concerning sexual harassment will be dealt with under this Anti-Sexual Harassment Policy for consistency and because of the additional safeguards it contains.

The Whistleblower, defined as those wishing to make a disclosure, may do so to the Headteacher, to a member of the local authority, to a prescribed person such as Her Majesty's Chief Inspector of Education in Wales, to a legal adviser or to a Member of Parliament or Welsh Government.

We believe that where the concern relates to an individual's own employment the school's Grievance Policy must be used. However, if the concern relates to something which is against the school's policies, falls below standards of practice or amounts to improper conduct then the procedures in this policy must be used.

We are committed to the highest possible standards of openness, integrity and accountability.

Aims

- To encourage all school personnel to report any serious concerns about any aspect of the school or the conduct of its personnel or others acting on behalf of the school.
- To work with other schools and the Local Authority to share good practice in order to improve this policy.
- To reassure personnel that they will be protected from reprisals or victimisation for whistleblowing in good faith.

Responsibility for the Policy and Procedure

When a concern has been raised the following procedure will be followed:

Role of the Governing Body

The Governing Body:

- has delegated powers and responsibilities to the Headteacher to ensure all school personnel and school volunteers are aware of and comply with this policy;
- will provide support for a member of staff who has raised a concern;
- will provide support for a member of staff against whom allegations have been made;
- must keep both parties informed of all progress during any investigation;
- will take no action against a member of staff if, after investigation, their concern has not been confirmed;
- will take disciplinary action if a concern is raised frivolously, maliciously or for personal gain;
- has responsibility for ensuring that the school complies with all equalities legislation;
- All governors will ensure compliance with equalities legislation and take appropriate action to address any prejudice-related incidents or breaches of this policy;
- has responsibility for ensuring funding is in place to support this policy;
- has responsibility for ensuring this policy and all policies are maintained and updated regularly;
- has responsibility for ensuring all appropriate policies are made available to parents;
- has nominated a link governor to visit the school regularly, to liaise with the Headteacher and to report back to the Governing Body;
- has responsibility for the effective implementation, monitoring and evaluation of this policy

Role of the Headteacher

The Headteacher will:

- ensure all school personnel and volunteers are aware of and comply with this policy;
- encourage all school personnel to raise any concerns they have regarding actual or potential breaches of duty or a failure by the school;
- provide support for a member of staff who has raised a concern;
- provide support for a member of staff against whom allegations have been made;
- keep both parties informed of all progress during any investigation;

- work closely with the link governor;
- provide leadership and vision in respect of equality;
- provide guidance, support and training to all staff;
- monitor the effectiveness of this policy;
- report to the Governing Body on the success and development of this policy.

Role of the Nominated Governor

The Nominated Governor will:

- work closely with the Headteacher and the coordinator;
- ensure this policy and other linked policies are up to date;
- ensure that everyone connected with the school is aware of this policy;
- report to the Governing Body as required;
- report to the Governing Body as required on the success and development of this policy

Role of School Personnel

School personnel have a duty to speak out against and report any:

- criminal offence that has been committed, is being committed or is about to be committed;
- person who has failed, is failing or is about to fail compliance with any legal obligation that they are subject to;
- miscarriage of justice that has occurred, is occurring or is likely to occur;
- health and safety issue that has endangered , is endangering or is likely to endanger any person;
- damage to the school environment that has been committed, is being committed or is about to be committed

School personnel, who speak out against and report any of the above, will receive support from the Governing Body. The Governing Body will give support to any member of the school personnel against whom allegations have been made.

School personnel have a duty to the school not to disclose confidential information. However, in accordance with the provisions of the Public Interest Disclosure Act 1998 this does not prevent an employee from seeking independent advice nor discussing their concern with the charity Public Concern at Work.

Raising a Concern

All raised concerns are investigated, and every effort is made to ensure confidentiality for all parties.

Support for Whistleblowers

Everything possible will be done to manage employment relationships following a genuine and reasonable concern being raised.

Stage 1

- All concerns should be made in person or in writing to your line manager. If this is not agreeable to you, please inform the Headmaster or Bursar or the Chair of the Governors.
- The person raising the concern may wish to receive help from the local authority or from their trade union representative.
- At any future meeting the employee may be accompanied by a colleague or their trade union representative.

Stage 2

- Within 10 working days the person with whom the concern has been registered acknowledges receipt in writing.
- The letter will state the following:
  - How the concern will be dealt with;
  - How long it will take to provide a final response;
  - Information on employee support services.

Stage 3

- After initial enquiries have been conducted, a decision will be made if an investigation should take place.
- The investigation will be either:
  - an internal investigation;
  - a referral to the police;
  - a referral to the Council Auditor;
  - an external independent enquiry.

Stage 4

- The employee will be informed in writing of the outcome of the investigation by the Governing Body.

- The employee has the right to take their concern to an independent body if they feel it has not been addressed adequately.

Support for the Alleged Person

The School will monitor the process and provide support for the alleged person if deemed needed and appropriate for the circumstances.

Raising Awareness of this Policy

We will raise awareness of this policy via:

- the School Handbook/Prospectus
- the school website
- the Staff Handbook
- reports such as the annual report to parents and Headteacher reports to the Governing Body

Training

All school personnel:

- have equal chances of training, career development and promotion
- receive training on this policy on induction which specifically covers:

  - the school's whistle blowing procedures
  - Confidentiality
  - Safeguarding and Child Protection

- receive periodic training so that they are kept up to date with new information
- receive equal opportunities training on induction

Equality

Under the Equality Act 2010, St. David's has a duty not to discriminate against any of the protected characteristics. Due regard has been given to equality law when developing and implementing St David's policies, practices and day-to-day activities. St David's will continually monitor the way this policy operates to ensure it does not unlawfully discriminate, permit harassment or victimisation, or limit equality of opportunity. St David's is committed to meeting its obligations under the Equality Act 2010 at all times.

Linked Policies

▪ Safeguarding & Child Protection	▪ Confidentiality
▪ Teaching Staff	▪ Support Staff

Initial Equality Impact Assessment

Please complete an initial equality impact assessment once this policy has been customised to suit your purposes.

Policy Title	The aim(s) of this policy	Existing policy (✓)	New/Proposed Policy (✓)	Updated Policy (✓)
			✓	

This policy affects or is likely to affect the following members of the school community (✓)	Pupils	School Personnel	Parents/carers	Governors	School Volunteers	School Visitors	Wider School Community

Question	Equality Groups																										Conclusion	
Does or could this policy have a negative impact on any of the following?	Age			Disability			Gender			Gender identity			Pregnancy or maternity			Race			Religion or belief			Sexual orientation			Marriage & Civil Partnership			Undertake a full EIA if the answer is 'yes' or 'not sure'	
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Yes	No
		✓			✓			✓			✓			✓			✓			✓			✓							✓
Does or could this policy help promote equality for any of the following?	Age			Disability			Gender			Gender identity			Pregnancy or maternity			Race			Religion or belief			Sexual orientation			Marriage & Civil Partnership			Undertake a full EIA if the answer is 'no' or 'not sure'	
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Yes	No
	✓			✓			✓			✓			✓			✓			✓			✓							✓
Does data collected from the equality groups have a positive impact on this policy?	Age			Disability			Gender			Gender identity			Pregnancy or maternity			Race			Religion or belief			Sexual orientation			Marriage & Civil Partnership			Undertake a full EIA if the answer is 'no' or 'not sure'	
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Yes	No
	✓			✓			✓			✓			✓			✓			✓			✓							✓

Conclusion	We have come to the conclusion that after undertaking an initial equality impact assessment that a full assessment is not required.

Preliminary EIA completed by	Date	Preliminary EIA approved by	Date