



1. **Introduction.** This document for Wotton House International School (WHIS) is based upon the Oxfordshire model procedure which was drawn up following consultation with all the recognised Trade Unions and Associations.
 1. **Scope:** This applies to all employees at WHIS including agency workers, self-employed and volunteers.
 2. **Policy Statement:** WHIS is committed to the highest possible standards of:
 1. Openness and inclusiveness
 2. Accountability and
 3. Integrity
 3. **Aims:** to encourage those working in the school to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate; that their confidentiality will be respected; to provide guidance on how to raise concerns; and to reassure those raising concerns that they are able to raise genuine concerns “made in the public interest” without fear of reprisals, even if they turn out to be mistaken.
 4. **What is 'Whistleblowing'?** 'Raising concerns about misconduct within an organisation or within an independent structure associated with it' (Nolan Committee on Standards in Public Life). The Public Interest Disclosure Act 1998 (PIDA 1998) protects employees from suffering a detriment in their employment or being dismissed by their employer if they make disclosures which in their reasonable belief are made ‘in the public interest’ and are made in accordance with the legislation.
 5. **Confidentiality.** Employees have common law confidentiality obligations to their employer. However, in a limited set of circumstances whistleblowing may override these obligations if an employee reveals information about their employment or the work of the School. This guidance sets out the circumstances under which these disclosures may lawfully be made.
 6. A **concern** must relate to something which either was, is likely to be, or currently:
 1. is a breach of the school's policies OR
 2. falls below established standards or practice OR
 3. amounts to improper conduct, including something that may be:

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| a breach of the law | a failure to comply with a legal obligation |
| a possible miscarriage of justice | a Health & Safety risk |
| damaging the environment | misuse of public money |
| corruption or unethical conduct | abuse of pupils, students or other users |
| deliberate concealment of any of these matters | any other substantial and relevant concern |

2. **How to Raise a Concern** ('Whistleblowing'): All concerns will be treated sensitively and with due regard to confidentiality and where possible every effort will be made to protect your identity if you so wish. Nevertheless, this information will need to be passed on to those with a legitimate need to have this information and it may be necessary for you to provide a written statement or act as a witness in any subsequent proceedings. This will always be discussed with you first. Where concerns are expressed anonymously the Proprietor will decide how to proceed. An investigation may be carried out, depending on the nature of the allegations and the evidence presented.
 1. **Step 1:** If you wish to raise a concern you should raise it with your line manager either in person or in writing.
 1. If it is inappropriate for you to approach your line manager a number of alternatives are available, including: (1) the Proprietors, (2) Gloucestershire Healthy Living and Learning or (3) a Trade union.
 2. Although you are not expected to prove beyond doubt the truth of your concerns, you will need to demonstrate that you have sufficient evidence or other reasonable grounds to raise them.
 3. You may wish to obtain advice from a trade union representative or a colleague. You may choose to be represented by a trade union representative or colleague at any meetings that are required.
 2. **Step 2:** The person with whom you have raised your concern will acknowledge its receipt as soon as possible and will write to you within 10 days to let you know how your concern will be dealt with. The information you can then expect to receive is:

1. an indication of how the concern will be dealt with
 2. an estimate of how long it will take to provide a final response
 3. whether any initial enquiries have been made
 4. whether further investigations will take place, and if not why not
 5. information about support available for you
3. **Step 3:** Initial enquiries will be made to decide whether an investigation is appropriate. Where an investigation is necessary, it may take the form of one or more of the following:
1. an internal investigation by the Principal or the Advisory Board, which may, for example, take the form of a disciplinary investigation
 2. a referral to the Police
 3. the setting up of an external independent inquiry
4. **Step 4:** You will be informed of the outcome of any investigation, in writing, and/or of any action taken, subject to the constraints of confidentiality and the law. If you do not feel your concern has been addressed adequately you may raise it with an independent body such as one of the following as appropriate:
1. your trade union
 2. the Citizens Advice Bureau
 3. a relevant professional body or regulatory organisation
 4. a relevant voluntary organisation
 5. the Police
 6. the Local Government Ombudsman
 7. Equality and Human Rights Commission
 8. NSPCC's Whistleblowing Helpline phone number (0800 028 0285)
5. You have a duty to the School not to disclose confidential information. This does not prevent you from seeking independent advice at any stage or from discussing the issue with the charity Public Concern at Work on 020 7404 6609 and www.pcaw.co.uk in accordance with the provisions of the Public Interest Disclosure Act 1998.
3. **Review and Reporting of the Procedure:** As an independent school overall responsibility for this procedure lies with the Proprietor who is also ultimately responsible for the management of services and staff within their school.
1. This procedure has been reviewed with reference to equalities, human rights and discrimination legislation. The school will from time to time monitor the procedures as undertaken in order to gather data to help establish whether the procedure is operated in a fair and consistent manner and to ensure that it continues to remain compliant and meets the needs of the school and those working in the school. In undertaking monitoring the School will not identify individuals.

| Revision Control Table | |
|------------------------|---|
| Drawn up by | Nick Shaw |
| Date | 22/09/17 |
| Review schedule | Annual |
| Reviewed | 01/06/18 by DS; 01/06/19 by DS; 01/06/20 by DS; 10/11/21 by DS; 10/09/22 by DS |
| Next Review | 10/09/23 |