



WALTHAMSTOW HALL  
SEVENOAKS

## WHISTLEBLOWING POLICY

This policy should be read in conjunction with other Safeguarding policies, notably Staff Code of Conduct and Induction of New Staff

### Introduction

The staff and governors of Walthamstow Hall seek to run all aspects of School business and activity with full regard for high standards of conduct and integrity. 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, Walthamstow Hall has established the following whistleblowing 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.

### Scope of the Policy

This policy applies to all members of the School community including any agency staff and contractors engaged by the School.

### What is Whistleblowing?

Whistleblowing occurs when a concern is raised about danger or illegality that affects others. As the person 'blowing the whistle' you will not necessarily be directly affected by the danger or illegality. Consequently, you will not necessarily have a personal interest in the outcome of any investigation with your concerns. This is different from a complaint or grievance which is dealt with by other School policies and procedures.

Throughout this policy, the term **whistle-blower** denotes the person raising the concern or making the complaint. It is not meant in a pejorative sense and is entirely consistent with the terminology used by Lord Nolan as recommended in the **Second Report of the Committee of Standards in Public Life: Local Spending Bodies** published in May 1996.

Walthamstow Hall is committed to tackling fraud and other forms of malpractice and treats these issues seriously. We recognise that some concerns may be extremely sensitive and have 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 the management structure of the School.

Walthamstow Hall is committed to creating a climate of trust and openness so that a person who has a genuine concern or suspicion can raise the matter with full confidence that the matter will be appropriately considered and resolved.

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 School Grievance Policy and Procedures.

## **When might the whistleblowing policy apply?**

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

- Any concern about safeguarding practices within the School.
- 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 breaches of School procedures which may advantage a particular party (for examples tampering with tender documentation, failure to register a personal interest).
- Endangering an individual's health and safety.
- Showing undue favour to a contractor or a job applicant.
- Deliberate concealment of information relating to any the above.

## **What action should the whistle-blower take?**

Walthamstow Hall encourages the whistle-blower to raise the matter internally in the first instance to allow those School staff and Governors in positions of responsibility and authority the opportunity to right the wrong and give an explanation for the behaviour or activity.

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

The School has designated a number of individuals to specifically deal with such matters and the whistle-blower is invited to decide which of those individuals would be the most appropriate person to deal with the matter. However, staff may raise issues in confidence with their chain of command should they prefer.

### **Name and Position**

Ms L Chamberlain, Headmistress, Designated Safeguarding Lead (DSL)  
Mr C Hughes, Deputy Head of the Senior School, Deputy DSL  
Mrs N Armitage, Deputy DSL in the Junior School  
Mrs G Palmer, Deputy DSL for the Junior School Holiday Club  
Mr A Horner, Bursar  
Mrs C Conway, Assistant Head, Junior School  
Mrs J Adams, Chairman of the Governing Body

The whistle-blower may prefer to raise the matter in person, by telephone or in written form marked private and confidential and addressed to one of the above named individuals. The Chairman of Governors can also be contacted in confidence via email ([ChairofGovernors@VHall.School](mailto:ChairofGovernors@VHall.School)). All matters will be treated in strict confidence and anonymity will be respected wherever possible.

Alternatively, if the whistle-blower considers the matter too serious or sensitive to raise within the internal environment of the School, the matter should be directed to an individual's professional association or to the charity organisation '**Protect**' which has lawyers who provide confidential advice, free of charge, regarding wrongdoing at work.

They can be contacted by telephone: 020 3117 2520 or email on [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)

If you are worried about a child, even if you are unsure, the NSPCC have counsellors available to speak to on 0808 800 5000 or they can be contacted by email on [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### **How will the matter be progressed?**

The individual 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 School staff, legal or personnel advisors, the police, 'The Department for Education'.

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 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.

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 Headmistress or the Chairman of the Governing Body.

### **Respecting confidentiality**

Wherever possible, Walthamstow Hall seeks to respect the confidentiality and anonymity of the whistle-blower and will as far as possible protect him/her from reprisals. We will not tolerate any attempt to victimise the whistle-blower or attempts to prevent concerns being raised and will consider any necessary disciplinary or corrective action appropriate to the circumstances.

### **Raising unfounded malicious concerns**

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

### **Review**

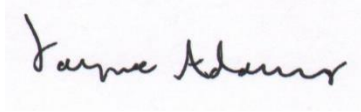
The Governing Body has overall responsibility for the policy and it will be reviewed regularly.

This policy has regard to the guidance issued by the Secretary of State.

**Walthamstow Hall policies are approved, ratified and reviewed regularly by the Governing Body in the light of statutory requirements.**

Revised February 2022  
Date of next review February 2023

Signed:

A handwritten signature in black ink, appearing to read 'Mrs J Adams', is shown within a light grey rectangular box.

Date: 22 February 2022

Mrs J Adams  
Chairman of the Governing Body