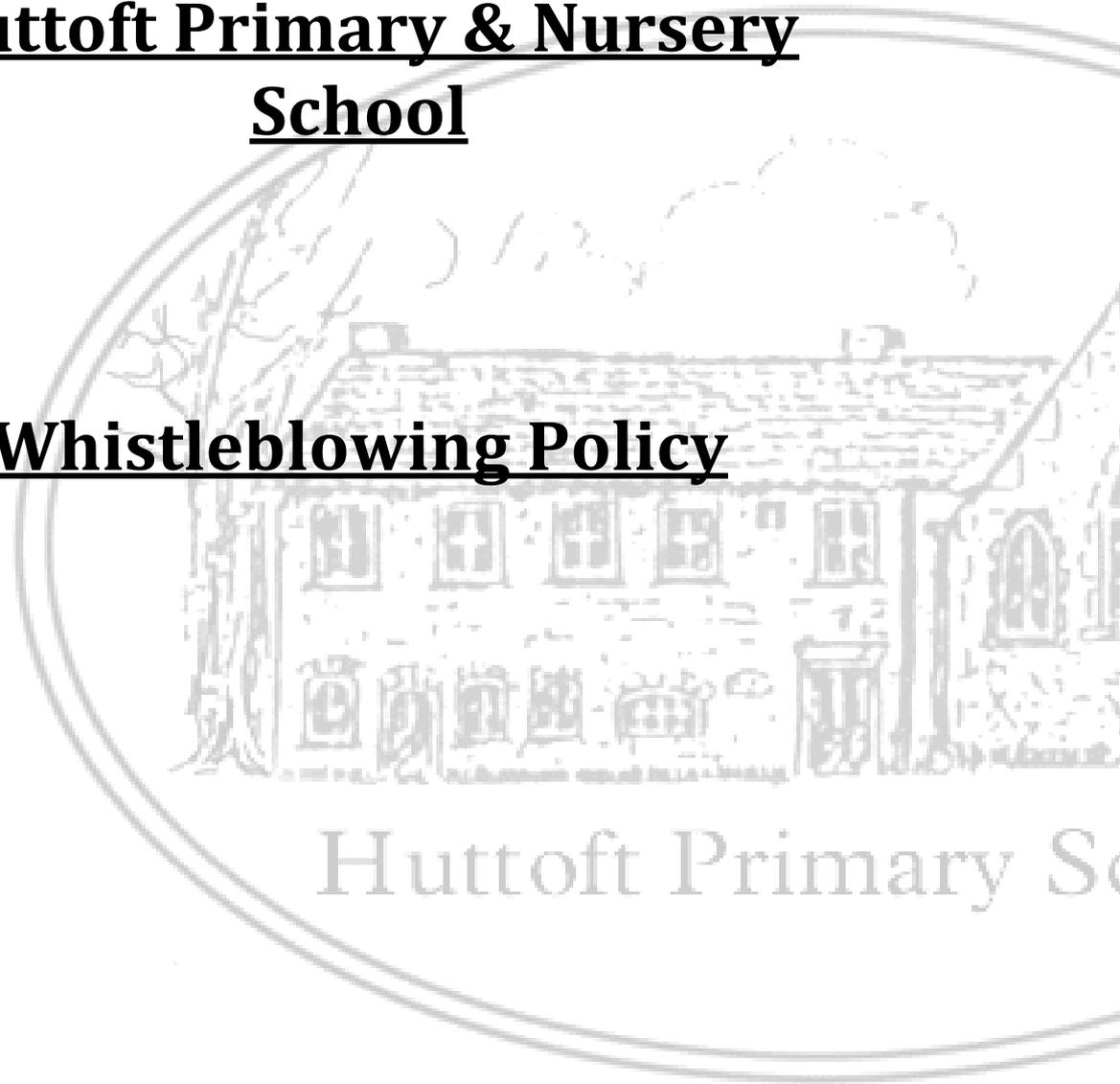


Huttoft Primary & Nursery School

Whistleblowing Policy



Huttoft Primary & Nursery School (Academy)
'Building Foundations, Enabling Discovery, Broadening Horizons'

A Governing Body Policy

The staff and Governors of Huttoft Primary School seek to run all aspects of school business and activity with full regard for high standards of conduct and integrity within an environment that protects the health, safety and welfare of all its employees. In the event that members of school staff, parents, Governors, or the school community at large becomes aware of activities which give cause for concern, Huttoft Primary School has established the following Whistleblowing Policy, or Code of Practice, 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.

Throughout this Policy, the term *whistleblower* 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 on Standards in Public Life: Local Spending Bodies published in May, 1996. Huttoft Primary School is committed to tackling fraud and other forms of malpractice and treats these issues seriously.

Huttoft Primary 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 the management structure of the school.

Huttoft Primary School 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. Huttoft Primary School employees reporting a genuine concern can expect to be protected under the Public Interest Disclosure Act 1998.

The provision of this Policy applies to matters of suspected fraud, serious breaches of school procedures and impropriety, Matters of more general grievances should be dealt with under the school's Grievance Procedure.

When might the Whistleblowing Policy apply?

The type of activity or behaviour which Huttoft Primary School considers 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 or unlawful activity
- Abuse of position
- Fraud and deceit
- Disregard of health and safety legislation
- Serious breaches of school procedures which may advantage a particular party (for example tampering with tender documentation, failure to register a personal interest).
- A deliberate cover up of information tending to show any of the above

What action should the Whistleblower take?

Huttoft Primary School encourages the *Whistleblower* to raise the matter internally but not necessarily in the usual line- management structure. School staff and Governors in positions of responsibility and authority will then have the opportunity to right the wrong and give an explanation for the behaviour or activity.

Huttoft Primary School has designated two individuals to specifically deal with such matters and the whistleblower is invited to decide which of those individuals would be the most appropriate person to deal with the matter.

Headteacher	c/o., Huttoft Primary School Church Lane, Huttoft,
Chair of Governors	Nr. Alford, Lincs. LN13 9RE

Alternatively, if the *whistleblower* considers the matter too serious or sensitive to raise within the internal environment of the school, the matter should be directed in the first instance to The Secretary of State at the DfEE (Department for Education Employment).

Wherever possible, the *whistleblower* should raise the matter in writing but in person; by telephone is acceptable. The whistleblower should set out the background and history of the concern, giving names, dates and places where possible and the reason why the member of staff is particularly concerned about the situation. The written record should be addressed to one of the above named individuals. All matters will be treated in strict confidence and anonymity will be respected wherever possible.

The whistleblower, unless anonymous, can expect to receive written acknowledgement of their concern within 10 working days of their concern being received. The acknowledgement will include how it is proposed to deal with the matter and an estimate of how long it will take to provide a response. It is expected that any investigation would normally be completed within 30 working days.

In addition, information and advice can be obtained from the charity 'Public Concern at Work'. This charity offers free legal advice in certain circumstances to people concerned about serious malpractice at work. Their literature states that matters are handled in strict confidence and without obligation.

How will the matter be progressed?

The individual(s) in receipt of the information or allegation (the investigating officer(s)) will carry out a preliminary investigation. This will seek to establish the facts of the matter and assess whether the concern had foundation and can be resolved internally. This preliminary investigation may identify the need to involve third parties to provide further information, advice or assistance, for example involvement of other members of school staff, the school's external auditors, legal or personnel advisors, the Police, the Department for Education. It is expected that the investigation will be concluded within 30 working days.

Records will be kept of work undertaken and actions taken throughout the investigation. These will be retained securely for 5 years (7 years if it's financial irregularity). 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.

Appropriate support will be made available to the complainant during the investigation of their complaint. This may be via a colleague or trade union rep. The same applies to witnesses.

The *whistleblower* will be informed of the results of the investigation and the action taken to address the matter unless he/she reported anonymously. 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 *whistleblower* 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) and the Governing Body.

Appendix 1 is a Record Sheet for use by the investigating officer.

Respecting Confidentiality

Wherever possible, Huttoft Primary School seeks to respect the confidentiality and anonymity of the whistleblower and will as far as possible protect him/her from reprisals. It must be appreciated however, that the investigation process may reveal the source of the information and a statement may be required as part of the evidence and/or an individual may be a possible witness in any future proceedings. Huttoft Primary School will not tolerate any attempt to victimise the whistleblower 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 Huttoft Primary School 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.

This Policy will be reviewed by the Governing Body annually, in the Summer Term.



Huttoft Primary School Record Sheet for actions following a whistleblowing report

Date concern/ allegation received. _____

Name of employee making
complaint/ allegation (unless
anonymous). _____

Nature of concern/ allegation
raised. _____

Date acknowledgement
provided to employee
(within 10 working days). _____

School nominated person
responsible for undertaking
investigation. (Investigating officer). _____

People to be interviewed, inc dates of any interviews.	
Outcome of investigation.	