



The Abbey

The independent school for girls aged 3-18.

Whistleblowing Policy

The Abbey School, Reading

What is Whistleblowing?

In this policy, 'Whistleblowing' means the reporting by employees of suspected misconduct, illegal acts or failure to act within The Abbey.

The Abbey wishes at all times to ensure high professional standards, and to encourage employees and others who have serious concerns about any aspect of the school's work to come forward and voice those concerns.

If you are unsure whether to use this policy or want independent advice at any stage, you may contact the independent charity 'Public Concern' on 0207 7404 6609. You will be given free confidential advice on how to raise concerns about serious malpractice at work.

Employees are often the first to realise that something maybe seriously wrong. 'Whistleblowing' is seen as a positive act that can make a valuable contribution to The Abbey's efficiency and long-term success. It is not seen as disloyal for colleagues to speak up. The Abbey is committed to achieving the highest possible standards of service and ethics in all of its practices and to help achieve this we encourage freedom of speech.

If you are considering raising a concern, please read this Policy first.

It explains the following:

- What The Abbey will do
- How to raise a concern
- The type of issues that can be raised
- How the person raising the concern will be protected

Aim of the policy

To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate and without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

The policy aims to:

- Encourage you to feel confident in raising any serious concerns at the earliest opportunity and to question and act upon concerns
- Provide avenues for you to raise the concerns and receive feedback on any actions taken
- Ensure a response to your concerns is provided and what to do if still unsatisfied
- Make you feel confident that If you have made the disclosure in good faith then you will be protected from possible victimisation and reprisals

Scope of the Policy

The Policy enables those who become aware of wrongdoing in The Abbey affecting another person or service, to report their concerns as soon as possible so that they can be investigated.

It is not intended to replace:

- Any concern regarding your own treatment as an employee. This should be raised under the Grievance policy
- If the concern is about the services of the school. This should be raised as a complaint. The policy applies to all employees of The Abbey as well as
 - Contractors working at The Abbey
 - Employees of suppliers
 - Anyone providing services under a contract or other agreement with the school
- Voluntary workers. Any serious concerns that you may have about the conduct of staff, volunteers or others acting on behalf of The Abbey that:
 - Act improperly
 - Are not in keeping with The Abbey's standards and policies
 - Fail to meet established standards of practice
 - Make you feel uncomfortable in terms of standards

These might relate to:

- Conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with other legal obligations)
- Racial, sexual, disability or other discrimination
- Health and safety of the public and/or other employees
- Damage to the environment
- Unauthorised use of funds or other assets
- Possible fraud and corruption
- Neglect or abuse
- Other unethical behaviour or conduct

This list is not exhaustive.

Your Legal Rights

The law provides protection for employees who raise legitimate concerns about specified matters. These are called 'qualifying disclosures' A qualifying disclosure is one made in the public interest by the employee who has a reasonable belief that:

- A criminal offence
- A miscarriage of justice
- An act creating risk to health and safety
- An act causing damage to the environment
- Corruptly receiving any gift or advantage, thus failing to comply with the Bribery Act

2010

- A breach of any legal obligation; or
- Concealment of any of the above is being, has been, or is likely to be, committed. It is not necessary for the employee to have proof that such an act is being, has been, or is likely to be committed, - a reasonable belief is sufficient.

The employee has no responsibility for investigating the matter; it is the school's responsibility to ensure that an investigation takes place

Where a disclosure is merely an expression of opinion that fails to show that a legal obligation has been or is likely to be breached, it cannot amount to a protected or qualifying disclosure for the purposes of the whistle blowing legislation.

Employees must have reasonable grounds for believing the information they have is accurate and not just idle gossip or rumour.

Concern about a colleague's professional capability should not be dealt with using this procedure. Please speak to your Manager if you have this concern.

Harassment or victimization

The Abbey is committed to good practice and high standards and to being supportive to its employees.

The Abbey recognises that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe, what you are saying is true, you should have nothing to fear because you will be doing your duty to The Abbey.

The Abbey will not tolerate any harassment or victimisation of the whistleblower and will take appropriate action to protect you when you raise a concern in good faith and will treat this as a serious disciplinary offence, which will be dealt with under the disciplinary rules and procedures.

Throughout this process:

- The Abbey will do all it can to help you through this process
- Your concerns will be taken seriously
- You will be given full support from senior management

The Abbey will (if appropriate) consider temporarily re-deploying you for the period of the investigation. We will endeavour to provide advice and support.

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

Anonymous allegations

The Abbey would encourage you to put your name to an allegation wherever possible. If you do

not tell us who you are it will be much more difficult to protect you or to give you feedback.

Concerns that are made anonymously are much less powerful but they may be considered at the discretion of The Abbey. In exercising that discretion, the factors that will be taken into account are:

- The seriousness of the issue raised
- The credibility of the concern
- The likelihood of being able to confirm the allegation from other sources

Untrue allegations

If you make an allegation in good faith and believe it to be true, but it is not confirmed by any investigation, The Abbey recognises your concern and you have nothing to fear. If you make an allegation maliciously or for personal gain, appropriate action will be taken that could include disciplinary action.

Raising a Concern

This will depend on the sensitivity of the issue and who is suspected of the wrongdoing. You should normally raise concerns with:

- Your Line Manger
- Head of Junior School, Senior School or Head
- Head of Finance and Resources

If the concern is about the Head of The Abbey then the concern should be raised with the Chair of Governors who will then decide how the investigation will proceed. You may raise your concern by telephone, in person or in writing. The earlier you can do this the better and easier it is to take action.

You will need to provide information about:

- The nature of your concern and why you believe it to be true
- The background and history of the concern, giving relevant dates etc.

You will not be expected to prove beyond reasonable doubt the truth of your allegation, you will need to demonstrate to the person contacted that you are acting in good faith and that you do have reasonable grounds for concern.

You may discuss your concerns with a colleague first and you may wish to raise the matter together. You can also invite your trade union, professional representative or a friend to be present for support during any meetings or interviews in connection with the concerns you have raised.

What The Abbey will do:

The Abbey will respond to your concerns as quickly as possible. Please remember that testing your concerns is not the same as either accepting or rejecting them.

In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and if so what form it should take. This may need to be carried out with strict confidentiality (not informing the subject of the complaint until (or if) it becomes necessary) until it is understood what form it should take.

Where appropriate the matters raised may:

- be investigated by management through the disciplinary and grievance procedures
- be referred to the police or an external auditors
- form the subject of an independent inquiry
- be referred and put through child protection/abuse procedures

Within ten working days of the concern being raised, the person investigating your concern will write to you acknowledging that the concern has been received and:

- indicate how The Abbey proposes to deal with the matter
- supply you with information on staff support
- tell you whether further investigations will be taking place and if not why not.

Contact between you and the person to whom you reported the incident may depend on the nature of the issues raised and the potential difficulties involved and the clarity of the information. It is likely that you will be interviewed again to ensure that your disclosure has been fully understood. That meeting can be arranged away from your workplace and you may want to have another person or representative present.

The Abbey will do everything it can to minimise any difficulties you may experience as a result of raising the concern. If you are asked to give evidence in criminal or disciplinary proceedings, the Abbey will arrange for support and advice.

To be assured that your disclosure has been addressed appropriately you will be kept informed of the progress and outcome of any investigation unless there are legal reasons why this should not be done.

What if you need to take it further?

The Abbey hopes that you will be satisfied with any action taken. If you are not and feel the need to take the matter outside of the school, the school would advise that you contact the following:

- Your trade union
- The police
- Other relevant bodies prescribed by legislation

Please ensure that you raise concerns with a prescribed contact as a public disclosure to anyone else could take you outside of the protection of the Public Interest Disclosure Act and of this Policy.

This Policy does not prevent you from taking your own legal advice.

Recording and Monitoring

The Abbey School will maintain a register containing all concerns that are brought to our attention. All staff/governors allocated to look after a concern must ensure the register is updated with the information regarding the allegation.

The Abbey School will review the register and produce an annual report for the Governing Body. The report will include a summary of the concerns raised and which department they relate to and any areas learned if appropriate. The report will not include any names as the aim of this is:

- to ensure that The Abbey learns from mistakes and does not repeat them and
- consistency of approach across all departments