



# THE ORATORY

## Whistleblowing Policy

Policy Owner:	Human Resources
Type of Policy:	Regulatory
Regulatory Body (if a regulatory policy)	The Charity Commission Ofsted Security of State for Education
Relevant Legislation (if a regulatory policy)	Employment Rights Act 1996 Public Interest Disclosure Act 1998 Data Protection Act 2018 General Data Protection Regulation (2016/679 EU)
Next review due:	February 2025
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Circulation:	All Staff & Governors
Linked policies	Child Protection Policy; Staff Employment Manual; Data Protection.

## Stage one

- 1 **Procedure:** You should disclose the suspected wrongdoing first to your Head of Department / Line Manager. In the event that your Head of Department / Line Manager is involved in the suspected wrongdoing, you shall be entitled to proceed directly to Stage Two of this procedure.
- 2 **Response:** You can expect a response detailing to whom the disclosure has been notified or any action taken within seven days of your Head of Department / Line Manager becoming aware of the disclosure.

## Stage two

- 3 **Procedure:** If no response is forthcoming after seven days or if your Head of Department / Line Manager is involved in the suspected wrongdoing you shall be entitled to notify the Head / Bursar / Director of People, as appropriate.
- 4 **Response:** You can expect a response detailing any action taken within seven days of the Head / Bursar becoming aware of the disclosure.

## Stage three

- 5 **Procedure:** If no such response is forthcoming you should inform the Chair of Governors of the disclosure.

## Stage four

- 6 **Outside body:** If you do not receive a response within seven days you shall be entitled to notify a relevant and appropriate body outside the School which may include:
  - 6.1 the Local Authority Designated Officer;
  - 6.2 Children's Social Care;
  - 6.3 the NSPCC Whistleblowing Helpline;
  - 6.4 the Health and Safety Executive;
  - 6.5 the Environment Agency;
  - 6.6 the Information Commissioner;
  - 6.7 the Department for Education (**DfE**);
  - 6.8 the Department for Business, Enterprise and Regulatory Reform;
  - 6.9 the Police;
  - 6.10 the Charity Commission;
  - 6.11 the Independent Schools Inspectorate (ISI);
  - 6.12 the Channel Police Practitioner;
  - 6.13 the Office for Standards in Education, Children's Services and Skills (Ofsted).
- 7 **NSPCC:** The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8am-8pm Monday-Friday) **or email** [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- 8 **Bypassing the procedure:** In extreme circumstances you will have the right to raise your concern directly with a relevant and appropriate outside body without first

having followed the stages above. This may however cause damage to the School and its reputation as well as constitute a breach of your own duty of confidentiality towards the School and this action should only be taken in extreme circumstances and after careful thought.

- 9 **Extreme circumstances:** The School will consider extreme circumstances exist where you have a reasonable belief that: the School will subject you to detriment if you inform your Head of Department / Line Manager in accordance with Stage one above or if you inform the Head / Bursar / Director of People in accordance with Stage two or you inform the Chair of Governors in accordance with Stage three; a cover-up is being mounted by the School; or a disclosure made previously to your Head of Department / Line Manager or the Head / Bursar / Director of People or the Chair of Governors in accordance with the stages above has not prompted a satisfactory response.
- 10 **The media:** Even where extreme circumstances are thought to exist, you should under no circumstances approach a commercial body or the media with details of the suspected wrongdoing. If you approach any such body and / or where your concern is disclosed for personal gain, the School may consider this to be gross misconduct and immediate disciplinary action may be taken against you.
- 11 **Queries:** If you have any queries about this procedure, you should contact the Head / Bursar / Director or People.