



THE  
PORTSMOUTH  
GRAMMAR  
SCHOOL

## The PGS Whistleblowing Policy

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## **Introduction**

The School is committed to operating with honesty and integrity, and we expect all staff to maintain high standards in accordance with The PGS Code of Professional Conduct for Staff. All organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

### **1 Aims**

The aims of this policy are to:

- 1.1 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 that their confidentiality will be respected;
- 1.2 provide staff with guidance as to how to raise those concerns; and
- 1.3 reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

### **2 Responsibility statement and allocation of tasks**

- 2.1 The Governing Body has overall responsibility for all matters which are the subject of this policy.
- 2.2 To ensure the efficient discharge of its responsibilities under this policy, the Governing Body has allocated tasks according to the table in Appendix.

### **3 Staff**

This policy covers all employees, officers, governors, contractors, volunteers, work placement students, casual workers and agency workers.

### **4 Responsibility**

- 4.1 Staff have a responsibility to raise concerns about unacceptable practice or behaviour:
  - 4.1.1 to prevent the problem worsening or widening;
  - 4.1.2 to protect or reduce risks to others;
  - 4.1.3 to prevent themselves from becoming implicated.
- 4.2 Staff may be the first to recognise that something is wrong but may not feel able to express their concerns due to a feeling that this would be disloyal to colleagues or because of fear of repercussions. These feelings, however natural, must never result in a child or any individual continuing to be unnecessarily at risk.

4.3 The principle is: *"Don't think what if I am wrong - think what if I am right."*

## 5 Definitions

### 5.1 Whistleblowing

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- 5.1.1 criminal activity;
- 5.1.2 safeguarding concerns (see paragraph 9 below);
- 5.1.3 failure to comply with any legal or professional obligation or regulatory requirements;
- 5.1.4 miscarriages of justice;
- 5.1.5 danger to health and safety;
- 5.1.6 damage to the environment;
- 5.1.7 bribery;
- 5.1.8 financial fraud or mismanagement;
- 5.1.9 other unlawful or unethical conduct in the workplace;
- 5.1.10 the deliberate concealment of any of the above matters.

### 5.2 Whistleblower

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities and such disclosure is in the public interest (a whistleblowing concern) you should report it under this policy.

## 6 Grievances

This procedure should not be used where you have a complaint relating to your personal circumstances in the workplace. The School's grievance procedure, as set out in the school's Equal Opportunity policy, should be used in such cases.

## 7 Detriment

Provided that this procedure is used appropriately and correctly, you will not suffer any detriment as a result of reporting a suspected wrongdoing. No action will be taken against a member of staff who raises a concern, if the concern proves to be unfounded and was raised in good faith and not malicious intent.

## 8 Further advice and support

If you are uncertain whether something is within the scope of this policy you should seek advice from the Head, Bursar, Designated Safeguarding Lead, Protect, the NSPCC whistleblowing helpline or the Modern Slavery helpline. It is also recognised that raising concerns can be difficult and stressful. Support is available from the School's Designated Safeguarding Lead, members of the Senior Teams, the School Counsellors, and professional or trade unions.

## 9 **Safeguarding:** Nothing within this policy is intended to prevent staff from complying with their statutory obligations in accordance with *Keeping Children Safe in Education* (DfE, September 2022, as updated). In particular:

9.1 **Safeguarding / child protection:** If you have any concern about a pupil's welfare, action should be taken immediately. You should report the concern to the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead. See the School's Safeguarding and Child Protection Policy and Procedure for full information about what to do if you have a concern about a pupil, including what to do if the Designated Safeguarding Lead is not available.

9.2 **Safeguarding - member of staff:** You should raise any concerns about another staff member with the Head, or if the concern is about the Head, with the Chair of Governors (without first notifying the Head) in accordance with the procedures in the School's child protection and safeguarding policy and procedures.

9.3 **Whistleblowing policy:** You should follow this procedure to raise concerns about poor or unsafe practices at the School or potential failures by the School or staff to properly fulfil its safeguarding responsibilities.

9.4 The PGS Safeguarding and Child Protection Policy and Procedure can be found on the following link: <https://www.pgs.org.uk/key-information/school-policies>)

## 10 The Modern Slavery helpline

The School is committed to the prevention of modern slavery. If you have any queries relating to modern slavery, please contact the Bursar. Identified instances of modern slavery should be immediately notified to the police. If you think you have identified an instance of modern slavery, or if you consider that you may be a victim of modern slavery, you may contact the Modern Slavery helpline on 0800 0121 700.

## 11 Appraisal and Exit Interviews

All staff are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during the course of their employment in accordance with this policy. Safeguarding children is at the centre of the School's culture and concerns should always be raised in accordance with paragraph 9 above.

If issues have not been identified before, safeguarding will be considered formally during staff performance development reviews and appraisal and finally at exit interviews which are held with all leavers. Staff who raise concerns about working practices at the School to the Designated Safeguarding Lead or an appropriate senior member of Staff will be protected from detriment under this policy.

## 12 **Confidentiality**

### 12.1 **Confidentiality**

Staff should feel able to voice whistleblowing concerns openly under this policy. However, if staff want to raise concerns confidentially, every effort will be made to keep their identity secret. If it is necessary for anyone investigating a concern to know a staff member's identity, this will be discussed with the relevant member of staff.

### 12.2 **Anonymous disclosures**

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

## 13 **Internal Process**

If, following consideration of the circumstances together with the information and guidance contained in this policy and other relevant documents, you wish to report a whistleblowing concern, you should follow the procedures outlined below:

### 13.1 **Stage one**

13.1.1 **Procedure:** You should disclose the suspected wrongdoing first to your Line Manager. In the event that your Line Manager or Designated Safeguarding Lead(s) is involved in the suspected wrongdoing, you should proceed directly to Stage Two of this procedure. Staff are encouraged to put their concerns in writing, outlining any relevant background and history and providing any relevant details such as names, dates and places.

13.1.2 **Response:** You can expect a response detailing to whom the disclosure has been notified or any action taken within seven days of your Line Manager becoming aware of the disclosure.

### 13.2 **Stage two**

13.2.1 **Procedure:** If no response is forthcoming after seven days from your Line Manager, if you are not satisfied with the way in which your concern has been handled or if your Line Manager or Designated Safeguarding Lead(s) is involved in the suspected wrongdoing you should notify the Head.

13.2.2 **Response:** You can expect a response detailing any action taken within seven days of the Head becoming aware of the disclosure.

13.3 **Stage three**

13.3.1 **Procedure:** If no such response is forthcoming after seven days from the Head, if you are not satisfied with the way in which your concern has been handled or if the Head is involved in the suspected wrongdoing you should inform the Chair of Governors of the disclosure.

14 **Relevant external reporting**

**Outside Body:** The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. The law recognises, as does paragraph 9 above, that in some circumstances it may be appropriate for you to report your concerns to a relevant outside body including:

- 14.1 the local authority's Designated Officer (LADO);
- 14.2 Children's Social Care;
- 14.3 the NSPCC;
- 14.4 the Health and Safety Executive;
- 14.5 the Environment Agency;
- 14.6 the Information Commissioner's Office;
- 14.7 the Department for Education;
- 14.8 the Department for Business, Energy and Industrial Strategy;
- 14.9 the police;
- 14.10 the Charity Commission;
- 14.11 the Independent Schools Inspectorate; or
- 14.12 the Channel Police Practitioner.

15 **Advice**

Staff are strongly encouraged to seek advice before reporting a concern to anyone external. In most cases you should not find it necessary to alert anyone external but before you do, as well as considering the internal help and support available which is identified above, please seek external advice from:

- 15.1 **Protect:** If you have any concerns about disclosing a suspected wrongdoing, the independent whistleblowing charity, Protect, operates a confidential helpline. Staff can call 020 7404 6609 for advice.

15.2 **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 (8.00 am to 8.00 pm Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

15.3 **The Modern Slavery helpline:** The Modern Slavery helpline is available for staff who do not feel able to raise concerns about modern slavery internally. Staff can call on 0800 0121 700.

## 16 **The media**

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 in a malicious manner or for personal gain, the protection given to you by this procedure may be lost. Additionally, the School may consider this to be gross misconduct and disciplinary action may be taken against you.

## 17 **Associated Policies**

The following School policies and procedures are relevant to this policy:

17.1 The PGS Equal Opportunities Policy and Dignity at Work Policy

17.2 The PGS Safeguarding and Child Protection Policy and Procedure

17.3 The PGS Professional Code of Conduct for staff

## 18 **Queries**

If you have any queries about this procedure, you should contact the Head.



## Appendix 1

### Allocation of Tasks and Version control

- 1. Allocation of tasks:** In accordance with paragraph 2 above, the Governing Body has allocated tasks according to the table below:

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	Assistant Head (Head of Sixth Form)	As required, and at least termly
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Assistant Head (Head of Sixth Form)	As required, and at least termly
Maintaining up to date records of all information created in relation to the policy and its implementation as required by GDPR	Assistant Head (Head of Sixth Form) and the Deputy Head of the Junior School	As required, and at least termly
Seeking / receiving input from interested groups (such as pupils, staff, Parents) to consider improvements to the School's processes under the policy	Assistant Head (Head of Sixth Form) and the Deputy Head of the Junior School	As required, and at least annually
Formal review	Governing Body	3-yearly

### 2. Version Control

Date of adoption/approval of this policy	17 <sup>th</sup> March 2023 (Governing Body)
Date of last review of this policy	9 <sup>th</sup> February 2023 (Audit & Risk Governor Committee)
Date for next review of this policy	Spring 2026
Policy author (SMT)	Assistant Head (Head of Sixth Form)
Status	Internal Staff
Report	Recruitment and Staff Guidance

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