



THE BUCHAN SCHOOL



KING WILLIAM'S COLLEGE

King William's College, The Buchan School and The Buchan Nursery

Whistleblowing Procedure

Issue Date: 09/18
Last Review Date (following update of the Employment Amendment Bill, 2023): 06/25
Next Review Date: 06/27

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WHISTLEBLOWING POLICY

1. Introduction

- 1.1 King William's College, The Buchan School and The Buchan Nursery (the "School") is committed to running all aspects of school business and activity with full regard for high standards of conduct and integrity. Any concern about a workplace situation should normally be raised with a line manager or Head of Department. However, it is recognised that because of the seriousness and sensitivity of some issues, this may be difficult or even impossible. The 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. This policy sets out arrangements for individuals to raise serious concerns in ways which will protect them from reprisal.
- 1.2 In accordance with Lord Nolan's Second Report of the Committee on Standards in Public Life (UK), the school's policy on whistleblowing is intended to demonstrate that the school:
- Will not tolerate malpractice;
 - Respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
 - Will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
 - Will invoke the school's disciplinary policy and procedure in the case of false, malicious, vexatious or frivolous allegations;
 - Will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.
- 1.3 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 procedures.

2. Scope of the Policy

- 2.1 The type of activity or behaviour which the 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 activity
 - Abuse of position
 - Fraud and deceit
 - Academic malpractice
 - Health and Safety
 - Unsafe practice and potential failures in the School's Safeguarding regime
 - Improper conduct or unethical behaviour
 - Concealment of any of the above
 - Miscarriages of justice and failure to comply with legal obligations.
- 2.2 This is not intended to be a comprehensive list and any matters raised under this policy will be considered seriously. This policy also provides, if necessary, for such concerns to be raised outside the organisation.

3. Safeguards

3.1 Protection

This policy is designed to offer protection to those employees or other members of the school who disclose such concerns provided the disclosure is made:

- In accordance with the procedures laid down
- Is declared that the disclosure is being made under the Whistleblowing Procedure.

3.2 Confidentiality

The School will treat all such disclosures in a confidential and sensitive manner, respecting the confidentiality and anonymity of the individual raising the concern so long as this does not hinder or frustrate any investigation. Any attempt to victimise the individual raising the concern or to prevent concerns being raised will not be tolerated. It may be appropriate to preserve confidentiality that concerns are raised orally rather than in writing, although members of staff are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity then the Police will in all cases be informed.

3.3 Unfounded Allegations

If an individual makes an allegation which is not confirmed by subsequent investigation, no action will be taken against that individual. If, however, the investigation shows that an individual has raised malicious unfounded concerns or attempted to make mischief, this will also be taken seriously and disciplinary action may be taken against the individual concerned.

4. Procedures for Making a Disclosure

4.1 The School encourages matters to be raised internally in the first instance to allow those school staff and governors in positions of responsibility and authority the opportunity to investigate and resolve the matter.

4.2 Disclosures should be made, in writing or in person, to the Principal. If, however, the disclosure is about the Principal then the disclosure may be made to the Chairman of the Governors of King William's College. It must be made clear that the disclosure is being made under the whistleblowing policy.

4.3 In all cases, the person to whom the concern has been made will acknowledge its receipt in writing to the whistleblower at his/her home address, and record the subsequent action taken. The person to whom the disclosure has been made will carry out a preliminary investigation, normally by appointing someone who has not previously been involved in the matter or is unlikely to subsequently be involved, and will report on findings to the Principal (or Chairman of Governors). 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. This process will normally be completed within a period of ten working days.

4.5 Outcomes

- If, on preliminary examination, the concern is judged to be wholly without substance or merit, it will be dismissed
- If it is judged that a case may exist, the matter will normally be dealt with in accordance with the school's discipline procedure or as otherwise deemed appropriate according to the nature of the case.

- 4.6 The whistleblower will be informed of the results of the investigation and the action taken to address the matter. 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 Principal and/or directed to the Chairman of Governors.

5. External Procedures

- 5.1 Where all internal procedures have been exhausted, or staff and volunteers feel unable to raise an issue with the School, or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels. A member of staff shall have a right of access to an external person/body. This may include (depending on the subject matter of the disclosure) Isle of Man Income Tax Division, The Work Permit Office, the Health and Safety at Work Inspectorate, Department of Health and Social Care's Children and Families Team and/or Isle of Man Safeguarding Children Board (where the disclosure relates to a child protection issue.)

Isle of Man Income Tax Division

Government Offices

Bucks Road

Douglas

Isle of Man

IM1 3TX

01624 685400

<https://www.gov.im/categories/tax-vat-and-your-money/income-tax-and-national-insurance/>

The Work Permit Office

The Office Manager

Work Permits

Department of Economic Development

Nivison House

31 Prospect Hill

Douglas

IM1 1ET

01624 682393

<https://www.gov.im/categories/working-in-the-isle-of-man/work-permits/>

Health and Safety at Work Inspectorate

Environment, Safety and Health Directorate

Department of Environment, Food and Agriculture

Thie Slieau Whallian

Foxdale Road

St John's

IM4 3AS

01624 685881

e-mail: Worksafe.doi@gov.im

<https://www.gov.im/about-the-government/departments/environment-food-and-agriculture/environment-safety-and-health-directorate/health-and-safety-at-work-inspectorate/>

Department of Health and Social Care's Children and Families Team

Department of Health and Social Care

2nd Floor Murray House

Mount Havelock

Douglas

IM1 2SF

Telephone: +44 1624 686179

Email: childcarereferrals.dsc@gov.im

<https://www.gov.im/categories/caring-and-support/children-and-families/>

Department of Health and Social Care's Registration and Inspection Unit

1st Floor Belgravia,

33-34 Circular Road,

Douglas.

IM1 1AE.

Telephone: +44 1624 642422.

E-mail to: RandI@gov.im

<https://www.gov.im/about-the-government/departments/health-and-social-care/registration-and-inspection-unit/>

Isle of Man Safeguarding Board

Email: safeguardingboard.co@gov.im

Telephone: (01624) 687365

5.2 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 (Monday to Friday 08:00 to 20:00) or email: help@nspcc.org.uk
Website: <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

5.3 It should be noted that there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the employee reasonably believes:

- That exceptionally serious circumstances justify it;
- That the School would conceal or destroy the relevant evidence;
- Where they believe they would be victimised by the School.

6. LINKED POLICIES

- Acceptable Use Policy – Staff
- Anti-Bullying Policy
- Staff Code of Conduct
- E-Safety Policy
- Safeguarding and Child Protection Policy
- Safer Recruitment Policy
- Social Media Policy