



Northampton School *for Boys*

Whistleblowing Policy

Approved by: NSB Trust Board

Designated Senior Leader:
Headmaster:

Matt Kneeshaw
Richard Bernard

This policy is in line with the statutory guidance contained within KCSiE 2022, Working Together to Safeguard Children 2018 and Northamptonshire Safeguarding Children Partnership Guidance as of 1 September 2022; Whistleblowing, Guidance for Employers and Code of Practice 2015; Whistleblowing procedure for maintained schools 2014, The Key for School Leaders 2022

Designated Safeguarding Lead	Deputy Designated Safeguarding Lead(s)	Safeguarding Governor and Chair of Governors
Matt Kneeshaw	Deputy DSLs: Craig Armstrong, Ilona Farkas, Sarah Bradley-Brophy, Lindsay Greenaway, Other safeguarding leads: Jon Elder, Phil Beaumont, Dan Pearle, Tom Winfield, Claire Alderson, Laura Checkley, Pete Loughney, Abi Imison, Helen Sharp, Karis Whittaker	Vicki Rockall – Safeguarding Governor Peter Bason – Chair of Governors

The named personnel with Designated Responsibility regarding allegations against staff are:

Designated Senior Manager and Headmaster	Deputy Designated Senior Manager	Chair of Governors (in the event of an allegation against the head teacher)
Richard Bernard	Matt Kneeshaw	Peter Bason

Our Data Protection Officer is:	Our Lead for Mental Health is:	Our Prevent SPOC is:
Aaron Peck	Lindsay Greenaway	Matt Kneeshaw Craig Armstrong Lindsay Greenaway

Whistleblowing Policy

The protection of students from harm is a responsibility shared between Statutory and Voluntary agencies with the principles established by the Children Act 1989 and Children Act 2004 being applied.

Certain parts of these Acts and Statutory Guidance affect schools and details are given below:

1. The school has a statutory duty to promote and safeguard the welfare of all its students.
2. The school has a duty to protect and support any student who is subjected to suspected or proven abuse.
3. All matters involving the possibility of child abuse will be taken seriously.
4. All personnel will familiarise themselves with the types and symptoms of child abuse.
5. Staff must be in no doubt what action to take if there is any reason to believe that child abuse is or may be occurring.

If you would like a copy of the full Child Protection & Safeguarding Policy and Procedures, please contact Mr M Kneeshaw or Mr C Armstrong through the School office.

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1 Aims

This policy aims to:

- Encourage individuals affected to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated, and that their confidentiality will be respected
- Let all staff in the trust know how to raise concerns about potential wrongdoing in or by the trust
- Set clear procedures for how the trust will respond to such concerns
- Let all staff know the protection available to them if they raise a whistle-blowing concern
- Assure staff that they will not be victimised for raising a legitimate concern through the steps set out in the policy, even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue)

This policy does not form part of any employee's contract of employment and may be amended at any time. The policy applies to all employees or other workers who provide services to the trust in any capacity including self-employed consultants or contractors who provide services on a personal basis and agency workers.

2 Legislation

This policy has been written in line with the above document, as well as [government guidance on whistle-blowing](#). We also take into account the [Public Interest Disclosure Act 1998](#).

This policy complies with our funding agreement and articles of association.

3 Definition of Whistleblowing

Whistle-blowing covers concerns made that report wrongdoing that is “in the public interest”. Examples of whistle-blowing include (but are not limited to):

- Criminal offences, such as fraud or corruption
- Pupils’ or staff health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment

A whistle-blower is a person who raises a genuine concern relating to the above.

Not all concerns about the trust count as whistle-blowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistle-blowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance.

When staff have a concern they should consider whether it would be better to follow our staff grievance or complaints procedures.

Protect (formerly Public Concern at Work) has:

- [Further guidance](#) on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure
- A free and confidential [advice line](#)

4 Procedure for staff to raise a whistleblowing concern

4.1 When to raise a concern

Staff should consider the examples in section 3 when deciding whether their concern is of a whistle-blowing nature. Consider whether the incident(s) was illegal, breached statutory or trust procedures, put people in danger or was an attempt to cover any such activity up.

4.2 Who to report to

Staff should report their concern to the headmaster. If the concern is about another member of staff, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern as soon as they are able. If the concern is about the headmaster, it should be reported to the Chair of Governors.

4.3 How to raise the concern

Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter.

5 Trust procedure for responding to a whistleblowing concern

5.1 Investigating the concern

When a concern is received by the headmaster - referred to from here as the 'recipient' - they will:

- Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative
- Get as much detail as possible about the concern at this meeting and record the information. If it becomes apparent the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure
- Reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken (see section 6 of this policy)
- Establish whether there is sufficient cause for concern to warrant further investigation. If there is:
 - The recipient should then arrange a further investigation into the matter, involving the chair of governors or designated safeguarding leader if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In other cases, they may need to report the matter to the police
 - The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps

5.2 Outcome of the investigation

Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified, and whether or not a referral is required to an external organisation, such as the local authority or police.

They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.

Beyond the immediate actions, the headteacher, trustees and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

6 Malicious or vexatious allegations

Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern.

If, however, an allegation is shown to be deliberately invented or malicious, the trust will consider whether any disciplinary action is appropriate against the person making the allegation.

7 Escalating concerns beyond the trust

The trust encourages staff to raise their concerns internally, in line with section 4 of this policy, but recognises that staff may feel the need to report concerns to an external body. A list of prescribed bodies to whom staff can raise concerns with is included here.

The Protect advice line, linked to in section 3 of this policy, can also help staff when deciding whether to raise the concern to an external party.

8 Approval

This policy will be reviewed annually

These procedures have been agreed by the board of trustees, who will approve them whenever reviewed.

Appendix from the Child Protection and Safeguarding Policy

Safeguarding concerns about and allegations against members of staff

17.1 Allegations that may meet the harms threshold

In the event that there is an allegation of abuse against a member of staff, we will adhere to Part 4, Section 1 of KCSIE (2022) and Northamptonshire Safeguarding Children Partnership guidance. See Appendix E for more details.

Allegations that may indicate that a person would pose a risk of harm if they continue to work in their present position or in any capacity with children in a school or college include:

- staff having behaved in a way that has harmed a child, or may have harmed a child;
- staff possibly committing a criminal offence against or related to a child;
- staff behaving towards a child or children in a way that indicates they may not be suitable to work with children; and/or
- staff behaving or possibly behaving in a way that indicates they may not be suitable to work with children.

This includes behaviour or incidents that have occurred both in school and outside of school.

Allegations against the headteacher

If an allegation is made against the Headteacher, it must be reported to the Chair of Governors.

Allegations against staff

If a concern or allegation of abuse arises against any member of staff, supply teacher or volunteer other than the Headteacher, it must be reported to the Headteacher without delay. This includes supply staff, volunteers and anyone working in or on behalf of the school, whether paid or unpaid. Allegations of abuse against staff must be reported to the Headteacher or Chair of Governors as appropriate and not discussed directly with the person involved.

The Headteacher or Chair of Governors should consider if the concern or allegation meets the threshold for Designated Officer intervention.

Allegations against staff relating to a position of trust issue will be referred to the Local Authority designated officer within 24 hours. If a child has suffered or may have suffered abuse or harm, a MASH referral will also be made and the police will be contacted if necessary.

A referral to the Disclosure and Barring Service will be made if a member of staff is dismissed or removed from their post as a result of safeguarding concerns, or would have been removed if they had not have resigned.

17.2 Safeguarding concerns that do not meet the harm threshold (low level concerns)

In the event that there is a safeguarding concern about a member of staff, we will adhere to guidance outlined in Part 4, Section 2 of KCSIE (2022) and Northamptonshire Safeguarding Children Partnership guidance.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

It is essential that low level concerns are reported. Such behaviours can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

We will act quickly, proportionately and appropriately in the event of a low level concern, to prevent abuse or harm of a child and to promote a culture of safeguarding. Dealing with low level concerns also protects those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

Staff will receive training about what may constitute a low-level concern. More information can be found in Part 4 of KCSIE (2022).

Reporting low level concerns

Low level concerns should be reported to the headteacher.

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. These records will be kept securely by Personnel.

The headteacher may:

- Speak directly to the person who raised the concern (unless it has been raised

- anonymously).
- Speak to the individual involved and/or witnesses.

The headteacher will then categorise the type of behaviour and decide on an appropriate course of action. This will be recorded, along with rationale for any decisions made and details of action taken.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. In the event that patterns and/or wider cultural issues within the school are identified, we will either:

- take action through our disciplinary procedures;
- refer behaviour to the local authority designated officer/s where a pattern of behaviour moves from a concern to meeting the harms threshold; and/or
- revise policies or implement extra training as appropriate, to minimise the risk of behaviour happening again.

We will retain low level concerns information for a period of 3 years after the staff member has left the school.

17.3 Supply staff

Although the school does not directly employ supply teachers, we will ensure that any concerns or allegations against supply teachers are handled properly.

The Governing body and Headteacher will liaise with the supply agency to determine whether to suspend or redeploy the supply teacher whilst they carry out their investigation.

We will inform supply agencies of our process for managing allegations and will take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. Informing supply agencies of our process for managing allegations includes inviting the agency's human resource manager (or equivalent) to meetings and regularly updating agencies on relevant school policies.