
WHISTLEBLOWING POLICY

Person(s) Responsible:	Business Manager
Governors' Committee:	Resources Committee
Last Review Date:	Autumn 2018
Next Review Date:	Autumn 2021
Status:	Statutory

Introduction

The staff and Governors of Collingwood College (the College) seek to run all aspects of College business activity with full regard for high standards of conduct and integrity. In the event that members of College staff, parents, Governors or the school community at large become aware of activities which give cause for concern, Collingwood College has established the following Whistleblowing Policy, or code of practice, which acts as a framework to allow concerns to be raised confidentially and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion.

Throughout this policy, the term 'whistleblower' denotes the person raising the concern or making the complaint. It is not meant in a pejorative sense and is entirely consistent with the terminology used by Lord Nolan as recommended in the Second Report of the Committee on Standards in Public Life: Local Spending Bodies, published in May 1996.

Collingwood College is committed to tackling fraud and other forms of malpractice and treats these issues seriously. Collingwood College recognises that some concerns may be extremely sensitive and therefore has developed a system which allows for the confidential raising of concerns within the College environment, but also has recourse to an external party outside the management structure of the College.

The policy applies to all employees of the College, Governors, consultants, contractors, casual and agency staff and volunteers (collectively referred to as staff in this policy)

Collingwood College 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.

The provisions of this policy apply to matters of suspected fraud and impropriety and not matters of a more general or personal grievance, which would be dealt with under the College's grievance procedures.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

When might the Whistleblowing Policy apply?

The type of activity or behaviour which Collingwood College considers should be dealt with under this policy includes:

- Manipulation of accounting records and finances
- Inappropriate use of College assets or funds
- Decision-making for personal gain
- Any criminal activity
- Abuse of position
- Fraud and deceit
- Serious breaches of College procedures which may advantage a particular party (for example tampering with tender documentation, failure to register a personal interest)
- Failure to comply with any legal or professional obligation or regulatory requirements
- Conduct likely to damage the College's reputation
- Unauthorised disclosure of confidential information

What action should the whistleblower take?

Collingwood College encourages the whistleblower to raise the matter internally in the first instance, to allow those College staff and Governors in positions of responsibility and authority the opportunity to right the wrong and give an explanation for the behaviour or activity.

The College does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult if the College cannot obtain further information from the person who raised the concern. It is also more difficult to establish whether any allegations are credible.

If an anonymous complaint is received a determination will be made about whether to investigate based on:

- a) The seriousness of the issue raised
- b) The credibility of the concern; and
- c) The likelihood of confirming the allegation from other sources

If the concern is in relation to safeguarding and the welfare of students at the College, the whistleblower should consider whether the matter is better raised under the College's child protection policy and in accordance with the arrangements for reporting such concerns i.e. via the designated safeguarding lead (DSL) although the principles set out in this policy may still apply.

The DSL at Collingwood College is Jamie Cleary.

Collingwood College has designated a number of individuals to specifically deal with such matters. The whistleblower is invited to decide which of those individuals would be the most appropriate person to deal with the matter.

Position: Co-Principals
 Chair of Governors

The whistleblower may prefer to raise the matter in person, by telephone or in written form marked private and confidential and addressed to one of the above named individuals. All matters will be treated in strict confidence and anonymity will be respected wherever possible.

The whistleblower may choose to name a second person (friend) who is aware of the issue and who can be relied to act in a confidential way for support.

Alternatively, if the whistleblower considers the matter too serious or sensitive to raise within the internal environment of the College, the matter should be directed in the first instance to:

Protect

CAN Mezzanine
7-14 Great Dover Street
London
SE1 4YR

Protect Advice Line: 020 3117 2520

Business Support: 020 3117 2525

General enquiries: 020 3117 2520

Protect Advice line: whistle@protect-advice.org.uk

This charity offers free legal advice in certain circumstances to people concerned about serious malpractice at work. Their literature states that matters are handled in strict confidence and without obligation.

It will very rarely, if ever, be appropriate to alert the media. The College strongly encourages whistleblowers to seek advice before reporting a concern to anyone external.

How will the matter be progressed?

The individual(s) in receipt of the information or allegation (the investigating officer (s)) will carry out a preliminary investigation. 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, for example involvement of other members of College staff, the College's external auditors, legal or personnel advisors, the police and Education and Skills Funding Agency (ESFA).

Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer(s), possibly in conjunction with the Governing Body, will consider how best to report the findings and what corrective action needs to be taken. This may include some form of disciplinary action or third party referral, for example to the police.

We will comply with data protection requirements in terms of any records made and kept.

The whistleblower will be informed of the results of the investigation and the action taken to address the matter. Depending on the nature of the concern or allegation, and whether or not it has been substantiated, the matter will be reported to the Governing Body and the ESFA.

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, their concerns should be raised with the investigating officer(s), the Governing Body and/or directed to the ESFA.

Respecting confidentiality

Wherever possible Collingwood College seeks to respect the confidentiality of the whistleblower and will, as far as is possible, protect him/her from reprisals. Collingwood College will not tolerate any attempt to victimise the whistleblower, or attempts to prevent concerns being raised, and will consider any necessary disciplinary or corrective action appropriate to the circumstances.

Raising unfounded malicious concerns

Individuals are encouraged to come forward in good faith with genuine concerns with the knowledge they will be taken seriously. If individuals raise malicious unfounded concerns or attempt to make mischief, this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty, appropriate to the circumstances.

Conclusion

Existing good practice within Collingwood College in terms of its system of internal control, both financial and non-financial, and the external regulatory environment in which the College operates ensure that cases of suspected fraud or impropriety rarely occur. This Whistleblowing Policy is provided as a reference document, to establish a framework within which issues can be raised confidentially internally and, if necessary, outside the management structure of the College. This document is a public commitment that concerns are taken seriously and will be actioned.