



PEPONI SCHOOLS

Whistleblowing Policy and Procedure

To be reviewed by:	Headmaster, Peponi School Head, Peponi House Head of Peponi House Kabete Kindergarten
Date of Policy:	September 2023
Review Frequency:	Annually
Review Date:	September 2024

1. The Policy

This policy is applicable to all members of staff of Peponi Schools (the **School**), including the Early Years School Stage (**EYFS**) and boarding staff, and other individuals working on behalf of the School - including agency workers, contractors and consultants - whether paid or unpaid. For the purposes of this policy, references to "staff" shall equally apply to these other individuals.

The School has adopted this policy and the accompanying procedure on whistleblowing to enable members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, a failure to comply with legal obligations, inappropriate behaviour or unethical conduct. The policy also provides, if necessary, for such concerns to be raised outside the organisation. The policy and procedure have reference to the Department for Education (**DfE**) [Keeping Children Safe in Education-2023](#).

2. Aims of the policy

The School is committed to conducting its business with honesty and integrity, and expects all staff to maintain high standards. However, 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 to prevent such situations from occurring and to address them when they do occur. The aims of this policy are:

- i. To remind staff of their duty 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;
- ii. To provide staff with guidance as to how to raise these concerns; and
- iii. To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

The School's policy on whistleblowing is intended to demonstrate that the School has a culture of safety for raising concerns, valuing employees and of reflective practice and will provide a clear and simple procedure for raising concerns, which is accessible to all staff.

3. Scope of this Policy

This procedure is separate from the School's adopted procedures regarding grievances. Individuals should not use the whistleblowing procedure to raise grievances about their personal employment position or how they have been treated as an individual. In those cases, the School's Grievance Policy and Procedure should be used. If staff are uncertain whether something is within the scope of this procedure, they should seek advice from the Head.

Staff may also have a 'low-level' concern which, for the purposes of the School's policies, is defined as any concern about an adult's behaviour towards a child that does not meet the threshold for being considered an allegation or is otherwise not serious enough to consider a referral at the time of its reporting. These fall outside of this procedure and staff should refer to the School's Low-Level Concerns Policy for further information, including how to report a low-level concern.

This procedure is to enable staff to express a legitimate concern regarding the School's practices.

Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of conduct, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment (negligence).

A whistleblower is a person who raises a genuine concern relating to suspected malpractice within the School. If staff have any genuine concerns related to suspected malpractice affecting any of the School's activities (a whistleblowing concern) they should report it under this procedure.

4. How to report a concern

A concern may be raised verbally or in writing stating that you are doing so under the whistleblowing policy. If at any stage it is felt that the concern falls under a different procedure, the whistleblower will be advised on how to proceed further.

Staff are encouraged to raise the concern in writing so that individuals feel that they have a record of what they reported and have time to make sure that they have included all relevant information. If the concern is reported by email, extra care should be taken to ensure that the concerns are directed to the appropriate person. An initial response will usually be provided within 48 hours. If no response is received within this timeframe, the individual should follow up by phone/in person.

When reporting the concern, as much information as possible should be given such as names, dates, places, the background and history of the concern and the reason why there is a concern about the situation.

The earlier a concern is raised, the easier it is to take action.

5. Who to report a concern to

Concerns should typically be directed to the Head.

If the concern relates to or involves the Head, the member of staff will have a right to raise it in confidence with the Board of Directors.

6. How your concern will be dealt with

The Head will appoint an appropriate member of staff to investigate the concern(s).

A meeting will be arranged with the whistleblower as soon as possible to discuss their concern. The whistleblower may bring a colleague to any meetings under this procedure; their companion must respect the confidentiality of their disclosure and any subsequent investigation. The whistleblower may be required to attend additional meetings in order to provide further information as the concerns raised are investigated.

Any concerns raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The whistleblower will be kept informed of progress and, whenever possible and subject to third-party rights, informed of the resolution. However, sometimes the need for confidentiality may prevent the School from providing whistleblowers with specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If the whistleblower is not satisfied that their concern is being properly dealt with, they will have a right to raise it in confidence with the Board of Directors

7. External Procedures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any suspected malpractice affecting any of the School's activities. In most cases, you should not find it necessary to alert anyone externally.

Where all internal procedures have been exhausted, a member of staff with a concern shall have a right of access to an external person/body. This may include (depending on the subject matter of the disclosure) HMC, IAPS, KAIS and CPAN (where the disclosure relates to a child protection issue).

We strongly encourage individuals to seek advice before reporting a concern to anyone external.

8. Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this procedure. We will make every effort to keep confidential the identity of members of staff who have raised a concern but if it is necessary for anyone investigating the concern to know their identity, this will be discussed with them. It may be appropriate, in order to preserve confidentiality, for concerns to be raised orally rather than in writing, although staff members 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.

The School does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if it cannot obtain further information from the staff member. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Head, or Board of Directors and appropriate measures can then be taken to preserve confidentiality.

9. Malicious Accusations

For employees of the School, deliberate false, malicious, vexatious or frivolous accusations will be dealt with under the School's Disciplinary Procedure, the outcome of which may lead to termination of employment.

For individuals who are not directly employed by the School, other action may be taken such as the School ceasing to use the individual's services.

10. Protection from Reprisal or Victimisation

It is understandable that whistleblowers are sometimes worried about possible repercussions. The School aims to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If staff believe they have suffered any such treatment, they should inform the Head. If the matter is not remedied, employees of the School should raise it using the School's Grievance Procedure.

Staff must not threaten or retaliate against whistleblowers in any way. If employees are involved in such conduct they may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue the employee personally for compensation in an employment tribunal.

II. Contacts

Contact	Contact details
Board of Directors	safeguardingdirector@peponischool.org
KAIS (CPAN)	admin@cpankenya.com
HMC (UK)	office@hmc.org.uk
IAPS	iaps@iaps.uk

