

**Queen's College London**  
**Queen's College Preparatory School**  
(including Early Years Foundation  
Stage)



*Whistleblowing Policy*

*Next annual review summer term 2024*

## 1 Introduction

The Council of Queen's College, London<sup>1</sup> ("the Council") has adopted this policy and the accompanying procedure on whistleblowing to enable all members of the Queen's community to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, failure to comply with legal obligations, inappropriate behaviour or unethical conduct in the school. The policy applies to everyone who works at Queen's, whether volunteer or staff, paid or unpaid, permanent or temporary, contracted or visiting. The policy also provides, if necessary, for such concerns to be raised outside the organisation.

Employment legislation governs the making of disclosures concerning workplace activities and is intended to protect people who whistleblow on bad practice from being subjected to any detriment or from being unfairly dismissed as a result. This procedure is available to anyone who discovers something they feel that they should pass on. All types of wrongdoing are included, whether they are acts committed by colleagues, faults in School procedures or oversights which should be rectified. The procedure should be used even in the event that the act or omission causing you concern has finished or has not yet started.

## 2 Safeguarding

Nothing within this policy is intended to prevent Queen's people from complying with their statutory obligations in accordance with *Keeping Children Safe in Education* (September 2022).

## 3 Elements of the policy

The School's policy on whistleblowing is intended to demonstrate that the School:

- Will not tolerate malpractice;
- Respects the confidentiality of anyone raising concerns and will provide procedures to maintain confidentiality so far as consistent with progressing the issue effectively;
- Will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- Will provide a clear and simple procedure for raising concerns, which is accessible to everyone working at Queen's.

## 4 Scope

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 situation.

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<sup>1</sup> Queen's College, London ("the school", "Queen's") consists of Queen's College ("QCL", "the College"), operating at 43-49 Harley Street, and Queen's College Preparatory School ("QCPS", "the Preparatory School") operating at 59-61 Portland Place.

This procedure is to enable people to express a legitimate concern regarding suspected malpractice within the School. 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, failing to comply with a legal obligation, miscarriages of justice, or creating or ignoring a serious risk to health, safety or environment.

People who feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, may use other whistleblowing channels, such as those outlined in section 7 below.

## **5 Confidentiality**

Individuals who wish to raise a concern under this procedure are entitled to have the matter treated confidentially and their name will not be disclosed to the alleged perpetrator of malpractice without their prior approval. In order to preserve confidentiality, it may be appropriate 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.

## **6 Procedure**

Anyone working at Queen's is at liberty to express their concern to the Principal, Headmistress, Senior Deputy Head or Bursar.

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The declarant will be kept informed of progress and, whenever possible and subject to third party rights, will be informed of the resolution.

A person who is not satisfied that their concern is being properly dealt with will have a right to raise it in confidence with the Council.

## **7 External procedures**

Where all internal procedures have been exhausted, an individual shall have a right of access to an external person/body. This may include (depending on the disclosure subject matter):

- 7.1 the Local Authority Designated Officer;
- 7.2 Children's Social Care;
- 7.3 the Health and Safety Executive;
- 7.4 the Environment Agency;
- 7.5 the Information Commissioner;
- 7.6 the Department for Education (DfE);
- 7.7 the Department for Business, Enterprise and Regulatory Reform;

- 7.8 the Police;
- 7.9 the Charity Commission;
- 7.10 the Independent Schools Inspectorate (ISI);
- 7.11 the Office for Standards in Education, Children's Services and Skills (Ofsted).

## **8 Bypassing the procedure**

In extreme circumstances, individuals have the right to raise a concern directly with a relevant and appropriate outside body without first having followed the stages above. This may however cause damage to Queen's and its reputation as well as constitute a breach of staff's own duty of confidentiality towards the school and this action should only be taken in extreme circumstances and after careful thought.

## **9 Extreme circumstances**

The school will consider these exist where the person concerned has a reasonable belief that:

- the school will subject them to detriment if they inform the Principal, Headmistress, Senior Tutor or the Bursar;
- the school would conceal or destroy the relevant evidence;
- a disclosure made previously in accordance with the stages above has not prompted a satisfactory response; or
- the Secretary of State has ordered it.

## **10 The media**

Even where extreme circumstances are thought to exist, individuals should under no circumstances approach a commercial body or the media with details of the suspected wrongdoing. If staff approach any such body and / or where a concern is disclosed for personal gain, the school may consider this to be gross misconduct and immediate disciplinary action may be taken against the member of staff concerned; if the person making such an approach is a volunteer and/or not under legal contract with the school, the school reserves the right to terminate their work at Queen's.

## **11 Malicious accusations**

False, malicious, vexatious or frivolous accusations will be dealt with under the School's Disciplinary Procedure.

## **12 Protection from reprisal or victimisation**

No person shall suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and following the Whistleblowing policy.

## Appendix

### NSPCC contact details

The NSPCC have a Whistleblowing Advice Line for professionals who are worried about how child protection issues are being handled in their own or another organisation. The number of the Advice Line is **0800 028 0285**. It can also be contacted via [NSPCC Helpline | NSPCC](#).