

Reporting Wrongdoing Policy

King's College London
Mathematics School

Monitoring and review

	Name	Date	Role
Written	Jennifer Riley	16.06.14	Deputy Head
Approved	Dan Abramson	17.06.14	Head Teacher
Ratified	Alison Wolf	3.07.14	Governor
Reviewed	Dan Abramson	01.02.16	Head Teacher
Ratified	Finance and General Purposes Committee	08/02/2016	Governors
Reviewed	Finance and General Purposes Committee	Spring 2018	Governors
Next review	Finance and General Purposes Committee	Spring 2021	Governors

Scope

This policy and the associated procedures

- apply to all of KCLMS's employees, whether permanent, temporary, casual, part-time or on fixed-term contracts, regardless of length of service;
- to job applicants;
- to individuals such as agency staff, consultants, self-employed contractors and volunteers who are not employees but who work at KCLMS;
- to any member of staff seconded to KCLMS from another school, if her/his role at KCLMS is equivalent to that of a full- or part-time KCLMS employee.

This policy and the associated procedures are not intended to have contractual effect. KCLMS may vary this procedure, including any time limits, as appropriate in any case.

Principles

KCLMS is committed to the highest standards of openness, probity and accountability. In line with this commitment, KCLMS encourages members of staff with serious concerns about KCLMS's work to come forward and voice those concerns. This also applies to concerns about the activities of staff, Governors and external organisations in their dealings with KCLMS. This policy

- provides the basis on which members of staff can raise any such concerns they may have, and receive feedback on action taken;
- allows members of staff to take the matter further if they are dissatisfied with KCLMS's response; and
- gives protection from reprisals or victimisation for reporting wrongdoing in good faith.

There are existing procedures in place to enable members of staff to raise grievances about their own employment. This policy is intended to cover concerns that fall outside the scope of individual grievances. The concern may be about something that

- is unlawful;
- is against KCLMS's policies;
- amounts to improper conduct;
- seems likely to harm somebody or the environment; or
- represents a cover-up of these sorts of issues.

All members of staff have a **duty** to report instances or suspicions of bribery, fraud or other malpractice, in particular concerns around child protection and safeguarding the welfare of children.

The Governors have overall responsibility which they delegate to the Head for the maintenance and operation of this policy. He will maintain a record of concerns raised and the outcomes and will report as necessary to the Governors.

Safeguarding individuals who report wrongdoing

Harassment or victimisation

The Governors recognise that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisals from those responsible for the malpractice. KCLMS will not tolerate harassment or victimisation and will take all possible measures to protect members of staff who raise concerns in good faith.

Confidentiality

KCLMS will protect the identity of members of staff who raise concerns and do not want their name to be disclosed. It must be appreciated, however, that the investigation may reveal the source of the information, and statements made by the members of staff who raised the issue may be required as part of the evidence. KCLMS encourages members of staff to put their name to allegations made. Concerns expressed anonymously are much less powerful, and they will be considered at the discretion of KCLMS. In exercising this discretion, the factors to be taken account of will include

- the seriousness of the issue raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources

Untrue allegations

If an allegation is made in good faith but is not confirmed by the investigation, no action will be taken against the member of staff. However, if members of staff make allegations that are malicious or vexatious, disciplinary action against them is likely.

How to raise a concern

The earlier members of staff express their concerns the easier it is to take action. As a first step a member of staff should normally raise concerns with the Designated Senior Lead (currently the Deputy Head). This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. The member of staff should refer to the Safeguarding policy for further guidance on reporting structure and procedure. Concerns are better raised in writing. This should set out the background and history of the concern, giving names, dates and places where possible, and the reason why the member of staff is concerned about the situation. A member of staff who does not feel able to put these concerns in writing can telephone or meet the appropriate officer. Members of staff may invite a colleague or their trade union or professional association to raise the matter in conjunction with them.

How will KCLMS respond?

The action taken will depend on the nature of the concern. The matters raised may for example be investigated internally or be referred to the Police. In order to protect individuals, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Some concerns may be resolved by agreed action without the need for investigation. Within two weeks of a concern being received, the Chair of Governors (where the concern is about a member of the SLT) or appropriate senior member of staff (for other concerns) will write to the member of staff who raised the issue:

- acknowledging that the concern has been raised;
- indicating how it proposes to deal with the matter;
- where possible, giving an estimate of how long it will take to provide a final response;
- and telling the member of staff whether further investigations will take place and if not, why not.

The amount of contact between the investigators considering the issue and the member of staff who has raised the issue will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from the member of staff. When any meeting is arranged with the member of staff, she/he will be given the right to be accompanied by a representative or colleague who is not involved in the area of work to which the concern relates. KCLMS accepts that members of staff need to be assured that the matter has been properly addressed. Therefore, subject to legal or contractual constraints, members of staff will receive information about the outcomes of any investigations.

Taking the issue further

This policy is intended to provide members of staff with an avenue to raise relevant concerns within KCLMS. It is hoped that members of staff will be satisfied with the action taken as a result. If a member of staff is not satisfied, and feels it is right to take the matter outside KCLMS, the following are possible contact points, some or all of which may be appropriate

- relevant professional bodies or regulatory organisations;
- the Local Authority or Council;
- the Police;
- the charity Public Concern At Work (telephone 020 7404 6609).

If a member of staff does take the matter outside KCLMS, they must make sure that they do not disclose otherwise confidential information.