



Whistleblowing Policy and Procedures

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Applies to: Group Leaders
Homestays
Teachers
Drivers
Activity Leaders
Office Team
Welfare & Accommodation
Safeguarding Team

Context: Applicable to all concerns (including allegations) about members of staff as well as homestays, volunteers and contractors, to share a genuine concern about a colleague's behaviour in confidence.

Last updated: February 2024

To be reviewed: March 2025

Statement

Whistleblowing is an important aspect of a safeguarded institution whereby staff, and volunteers are encouraged to share genuine concerns about a colleague's behaviour in confidence, with the School Director, Designated Safeguarding person, or line manager as appropriate.

Working with vulnerable groups, including minors and young people, places staff and volunteers in positions of power. In order to retain the trust of vulnerable people, it is essential that all reasonable steps are taken to ensure this power is exercised responsibly.

There may be situations whereby staff or volunteers have genuine concerns about the conduct of a colleague towards a participant. All employees of Country Cousins have the right and the responsibility to raise concerns, without prejudice to their own position and to receive appropriate support when doing so. Concerns can be raised about the behaviour of staff, managers, volunteers, students or others, which may be harmful to those in their care.

In accordance with the Public Interest Disclosure Act 1988,¹ Country Cousins will support and protect those staff and students who, in good faith and without malicious intent, report suspicions of abuse or concerns about colleagues and their actions.

Whistleblowing should be part of transparent work practices and is not intended to set up mistrust or suspicion among staff and volunteers.

Principles

- Country Cousins makes clear that no staff member will be subject to victimisation or other prejudice by reporting concerns which they believe to be true.
- Any issue reported will be taken seriously and investigated. This may involve interviews or an investigation to establish the facts.
- Country Cousins prefers matters to be raised where suspicion first arises rather than waiting for or searching for proof.
- Concerns raised will be treated in a confidential manner and feedback will be given on any action taken.
- Employees should put their names to any allegation wherever possible.
- A complainant will need to demonstrate that there are reasonable grounds for the concern, and will be expected to co-operate with any investigation that takes place. If any meeting or interview is arranged, there is a right to be accompanied by a workplace colleague.

What does the Policy cover?

This policy covers whistleblowing relating to alleged:

- **Miscarriages of justice in the conduct of statutory or other processes,**
- **Failure to comply with a statutory or legal obligation,**
- **Potential maladministration, misconduct or malpractice,**
- **Health and safety issues including risks to the public as well as risks to students and members of staff,**
- **Abuse of authority,**
- **Unauthorised use of public or other funds,**
- **Fraud or corruption,**
- **Breaches of financial regulations or policies,**

¹ <http://www.legislation.gov.uk/ukpga/1998/23/section/2>

- **Mistreatment of any person,**
- **Action that has caused or is likely to cause physical danger or risk serious damage to school property or a person,**
- **Sexual, physical or emotional abuse of members of staff or students,**
- **Unfair discrimination or favouritism,**
- **racist incidents or acts, or racial harassment**

Procedures

Reporting a Concern

- All matters should be kept in strict confidence and therefore concerns should be raised with a line manager or the Designated Safeguarding Lead. This is subject to the seriousness and sensitivity of the issues involved and who is thought to be involved in the alleged wrongdoing or malpractice.
- If the staff member believes that a manager or Director is involved, they should raise their concerns with the Managing Director.
- Staff should set out the background of the concern, giving names, times and places where possible, and the reason why they are particularly concerned about the situation and this can be done via email, in person or in writing.
- Staff are not expected to provide proof of an allegation but will need to demonstrate when providing information that there are sufficient grounds for the concerns.
- Country Cousins will treat all anonymous allegations seriously but a concern expressed anonymously is much less powerful and can prove difficult to investigate.

Response to the Concern

- The action taken by Country Cousins will depend on the nature of the concern raised. The matters raised will normally be investigated internally with consultation from the Management team and following consultation with the legal team if the report requires this, concerns may be referred to a regulatory body or the Police in criminal matters.
- In order to protect the employee, Country Cousins and also those accused of possible wrongdoing or malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form the investigation should take.
- Some concerns may be resolved by immediate agreed action without the need for a full investigation. If urgent action is required, this will be taken before any investigation is conducted.
- Within 10 working days of a concern being received, where the identity of the employee is known the School will write to the staff member:
 - Acknowledge that the concern is being raised
 - Indicating how it proposes to deal with the matter
 - Giving an estimate of how long it will take to provide a final response

- Telling the staff member whether any initial enquiries have been made, and
- Telling the employee whether further investigations will take place, and if not, why not.

The School will provide the necessary advice about the procedure and give practical support that is possible. Subject to legal constraints, staff members will normally receive feedback about the outcome of any investigation.

Confidentiality

Country Cousins will try and protect the identity of employees who raise a serious concern and do not want their identity to be disclosed. However, it should be recognised that in some instances, it may not be able to resolve the concern without revealing the identity (for instance because a statement from an employee may be required as supporting evidence). In these circumstances the employee will be advised on how the investigation will proceed.

False Allegations

If an employee makes an allegation in good faith that cannot be confirmed by an investigation, no action will be taken against the employee. If, however, an employee makes an allegation for an ulterior motive, e.g. for a malicious reason, disciplinary action will be taken against that employee which could result in dismissal.