



1. **Wrongdoing at work:** This procedure is designed to allow any wrongdoing at the School to be brought to the attention of the appropriate person and rectified. It is available to all employees who discover something they feel they should pass on. All types of wrongdoing are included whether they are acts committed by fellow employees, 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. **Low Level Concern:** Knightsbridge School promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

**What is a low level concern?** A low-level concern is any concern, no matter how small and even if no more than a 'nagging doubt', that an adult may have acted in a manner inconsistent with the school's Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour particularly towards or around children. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. It is crucial that any such concerns, including those which do not meet the allegation/harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately.

### **Sharing low-level concerns:**

Low-level concerns about a member of staff should be reported to the designated safeguarding lead (or deputy). Where a low-level concern is raised about the designated safeguarding lead, it should be shared with the head.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school or college, that concern should be shared with the designated safeguarding lead (or deputy), and/or head, and recorded and shared with their employer.

### **Recording low-level concern:**

All low-level concerns will be recorded in writing by the designated safeguarding lead (or deputy). The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. The record will be shared with HR who will check for any potential patterns of concerns. The information collected will help determine what further action may need to be taken.



If a pattern of concern is identified a decision will be made on the appropriate course of action, this will be in line with the disciplinary and capability policy or where a pattern of behaviour moves from a concern to meeting the harm threshold will be referred to the LADO

3. **Grievances:** This procedure should not however be used where the information you have regarding a wrongdoing relates to a matter which could be raised as a grievance and it is your intention to raise the matter as a grievance. The Grievance Procedure should be used in such cases.
4. **Detriment:** Provided that this procedure is used correctly, you believe the truth of the facts you are reporting and that the matter is in the public interest you will not suffer any detriment as a result of reporting the wrongdoing. However, a failure in any of these regards may render the protection given to you by this procedure to be lost.

#### *Child Protection Concerns*

If you have concerns about another staff member then this should be referred to the Head or in her absence the Principal. Where there are concerns about the Head this should be referred to the Principal or in his absence the Proprietor without first notifying the Head. Where there are concerns about the Principal this should be referred to the Proprietor without first notifying either the Head or the Principal. If it is not possible to report concerns to the Head or the Principal in the circumstances above you should report any concerns directly to the Designated Safeguarding Lead or in her absence, the Deputy Designated Safeguarding Lead. In any event, you may consider discussing any concerns with the school's Designated Safeguarding Lead and make any referral via them.

If you have concerns about poor or unsafe practice and potential failures in the school's safeguarding regime, you should raise these concerns with the Head or Principal.

If you feel unable to raise an issue with the school or feels that their genuine concerns are not being addressed, you may use other whistleblowing channels including:

- The NSPCC whistleblowing helpline :  
0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday  
Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).  
NSPCC, Weston House, 42 Curtain, Road, London EC2A 3NH
- Her Majesty's Chief Inspector of Education, Children's Services and Skills ("the Chief Inspector") about matters relating to the regulation and inspection of establishment and agencies for children's social care services.

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## Whistleblowing



Ofsted, Piccadilly Gate, Store Street, Manchester M1 2WD  
Tel: 0300 123 3155  
Email: [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk)

### *Examination Malpractice*

#### **Overview**

As an examination centre, Knightsbridge follows the recommendations of the Independent Commission into Malpractice (2018) and is committed to developing an ethical culture in which integrity in examinations and assessment is emphasised for both staff and students, in order to reduce the risk of malpractice. Such a culture of honesty and openness should enable staff and students to report matters of concern, as per the procedures laid out in this Whistleblowing Policy. Whistleblowing is encouraged, not penalised, and staff, parents or students should feel they have a duty to report any concerns they have about the conduct of examinations.

For staff, the centre explains clearly what constitutes malpractice and unethical behaviour in examinations and non-examined assessments. For further information, please refer to 'KS Examination Policy 22.23'. For students who are undertaking, or who are about to undertake, their courses of study, we explain what constitutes malpractice and inform them of the regulations surrounding their assessments, as well as academic integrity more broadly. Parents can report concerns by getting in touch with the Head of Centre or Director of Learning. The Centre commits to working together with JCQ when investigating potential malpractice, including at an earlier stage than when it becomes a JCQ investigation, wherever possible and compliant with GDPR and competition law. All concerns will be fully investigated by appropriately trained and experienced individuals.

#### **Reporting concerns**

Concerns should initially be raised with the Head of Centre or Director of Learning (DoL). It will then follow the procedure outlined in 'other concerns' below. If this doesn't resolve the matter, or the Head of Centre or DoL is believed to be involved, it should be reported to the awarding body (as per stage 4 in reporting 'other concerns.')

#### **Anonymity**

As a Centre, we do everything reasonable to protect the reporter's identity, if requested. Members of staff who wish to report suspected malpractice at a centre where they work are protected by the Public Interest Disclosure Act (PIDA). More guidance on this is available from the JCQ website. Members of the public are not protected by PIDA, but awarding bodies make every effort to protect a Whistleblower's identity if that is what they wish, unless they are legally obliged to release it.

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## Whistleblowing



### *Other Concerns:*

#### *Stage One*

4. **Procedure:** You should disclose the suspected wrongdoing first to an SMT member. In the event that an SMT member is involved in the suspected wrongdoing, you shall be entitled to proceed directly to Stage Two of this procedure.
5. **Response:** You can expect a response detailing to whom the disclosure has been notified or any action taken within 7 days of the SMT member becoming aware of the disclosure.

#### *Stage Two*

6. **Procedure:** If no response is forthcoming after 7 days or if the SMT member is involved in the suspected wrongdoing you shall be entitled to notify the Head.
7. **Response:** You can expect a response detailing any action taken within 7 days of the Head becoming aware of the disclosure.

#### *Stage Three*

8. **Procedure:** If no such response is forthcoming you should once more inform the Head of the disclosure.

#### *Stage Four*

9. **Outside body:** If you do not receive a response within 7 days you shall be entitled to notify a relevant and appropriate body outside the School which may include:
  - The Health and Safety Executive
  - The Environment Agency
  - The Information Commissioner
  - The Department for Education
  - The Department for Business Innovation and Skills
  - The Police
  - The Commission for Social Care Inspection
  - Local Education Authority
  - Examinations Awarding Body
10. **Bypassing the procedure:** In extreme circumstances you will have the right to raise your concern directly with a relevant and appropriate outside body without first having followed the stages above. This may however cause damage to the School and its reputation as well as constitute a breach of your own duty of confidentiality towards the School and this action should only be taken in extreme circumstances and

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### Whistleblowing



after careful thought.

11. **Extreme circumstances:** The School will consider extreme circumstances exist where you have a reasonable belief that: the School will subject you to detriment if you inform an SMT member; a cover-up is being mounted by the School; or a disclosure made previously to an SMT member or the Head in accordance with the stages above has not prompted a satisfactory response.
12. **The media:** Even where extreme circumstances are thought to exist, you should under no circumstances approach a commercial body or the media with details of the suspected wrongdoing. If you approach any such body and/or where your concern is disclosed for personal gain, the School will consider this to be gross misconduct and immediate disciplinary action will be taken against you.
13. **Queries:** If you have any queries about this procedure you should contact the Head.

Approved by Shona Colaco

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Approved by Aatif Hassan

September 2022