



‘Explore, Engage, Empower’

‘Where Mud washes off, but memories last lifetime’

Whistleblowing Policy

School:	Orchard Therapeutic Farm		
Policy:	Whistleblowing Policy		
This policy will be reviewed on an annual basis; however, should a need arise, it will be reviewed when required.			
This policy will be read, understood, and signed by all staff yearly and when changes have been made in line with government and DoFE guidelines and changes.			
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Rationale

The staff seeks to run all aspects of Provision's Business and activity with full regard for high standards of conduct and integrity. If members of staff, parents, directors or the Provision's community at large become aware of activities that give cause for concern, the Provision has this Whistleblowing Policy, which acts as a framework to allow concerns to be raised confidentially and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion, if necessary, under the Provisions disciplinary procedure.

Aims

The aims of this whistleblowing policy are to:

- Enable employees of Orchard Therapeutic Farm to raise any perceived matters of impropriety in a confidential manner.
- Highlight the Provision's commitment to ensuring that integrity is maintained.
- Resolve any perceived matters of impropriety as near as possible to their point of origin.
- Operate in a way that will not result in the victimisation of an individual who brings about a complaint under the whistleblowing policy.

All staff and volunteers in our Provision must comply with 'Keeping children safe in education 2024' which includes taking action to protect a child who may be at risk of harm or in need of services and to make appropriate referrals to children's social care. Any member of staff should press for re-consideration if they believe a child is not being safeguarded. Safeguarding issues raised by a whistle-blower will be handled in line with our child protection procedures.

This section should be read in conjunction with

- The provisions of child protection policy & procedures
- The 'managing allegations against staff' policy
- Local Safeguarding Children Partnership (LSCP) procedures
- Keeping children safe in education (DfE 2023)
- What to do if you're worried about a child (DfE 2015)

Responsibility for the Policy and Procedure

The Director has the responsibility for monitoring and evaluating this policy.

- Ensure all OTF personnel, pupils and parents are aware of and comply with this policy.
- Provide guidance, support, and training to all staff.
- Monitor the effectiveness of this policy.

This Procedure should be made available to all Orchard Therapeutic Farm employees.

Introduction

1. The Second Report of the Committee on Standards in Public Life: Local Public Spending Bodies published by The Nolan Committee used the term "whistleblowing" to mean the confidential raising of problems or concerns within an organisation by a member of staff. This is not "leaking" information but refers to matters of impropriety e.g. a breach of law, provision procedures or ethics. Nor is whistleblowing the raising of a grievance within the provision (which would be dealt with under the staff grievance procedures).

2. The staff of Orchard Therapeutic Farm seek to run all aspects of the provision business and activity with full regard for high standards of conduct and integrity. If members of staff, parents, at large become aware of activities that give cause for concern, the provision has this Whistleblowing Policy which acts as a framework to allow concerns to be raised confidentially and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion, if necessary, under the provision's disciplinary procedure.
3. The provision is committed to tackling fraud and other forms of malpractice and treats these issues seriously. Orchard therapeutic Farm recognises that some concerns may be extremely sensitive and has therefore developed a system that allows for the confidential raising of concerns.

When might the whistleblowing policy apply?

4. Individuals are encouraged to come forward in good faith with genuine concerns knowing they will be taken seriously. A whistle-blower should ask a few questions before taking action:
 - is it, or do you believe, the action to be illegal?
 - is it, or do you believe it to be against codes of conduct issued by Orchard Therapeutic Farm.
 - does it contradict what the employee has been taught, or should have been taught?
 - is it about an individual's behaviour or is it about general working practices?
 - has the whistle-blower witnessed the incident?
5. If any individual raises malicious unfounded concerns or attempts to make mischief, this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances. All allegations should be capable of being dealt with through the disciplinary procedure and will be considered appropriately.
6. Where the alleged activity or behaviour cannot be dealt with under the scope of other procedures then consideration should be given to using this Whistleblowing Policy e.g.
 - manipulation of accounting records and finances.
 - inappropriate use of provision assets or funds.
 - Decision-making for personal gain.
 - any criminal activity.
 - damage to the environment of the provision.
 - dangerous practices.
 - abuse of position.
 - fraud and deceit or corrupt practices.
 - serious breaches of Orchard Therapeutic Farm procedures that may advantage a particular party (for example tampering with tender documentation, failure to register a personal interest);
 - sexual or physical abuse of pupils or others.
 - other unethical conduct.

Anonymous allegations will only be considered if the issues raised are:

- very serious.
- the credibility of the allegation is considered to be high.
- the likelihood of confirming the allegation is high.

Concerns about a child

In the first instance, the person with the concern should discuss this with the Designated Safeguarding Lead – action may already have been taken and/or the designated staff may have sought confidential advice from partner agencies such as children’s social care or the police. If the individual is not satisfied with the outcome of this discussion, they should report their concerns to the Director or one of the other Designated staff.

If the individual still has concerns about the safety or welfare of the child, they should contact at least one of the following:

- The staff member with responsibility for safeguarding
 - Local Authority lead officer for safeguarding in education
- (Oxfordshire LADO is: Alison Beasley Alison.Beasley@Oxfordshire.gov.uk Mobile: 07833 436649)

If the child is in danger or at immediate risk of harm, anyone can make a referral to children’s social care **Oxfordshire MASH team 0345 050 7666**. The Designated Safeguarding Lead should be informed as soon as possible that a referral has been made.

Concerns about a colleague / adult in Orchard Therapeutic Farm

This relates to concerns that a member of staff, volunteer or other adult in Orchard Therapeutic Farm may have harmed a child/ren or behaved in a way that suggests they may be unsuitable to work with children. In line with our ‘managing allegations against staff’ policy, anyone who has concerns about the behaviour of another adult in our provision should report this to the Director in the first instance, unless the concern relates to the Director.

If the allegation or concern relates to the Director - or there is reason to believe that s/he not taking the appropriate action / the individual does not believe their concerns are being taken seriously - they should contact at least one of the following:

- OTF Proprietor
 - The Local Authority Designated Officer (LADO) Call 01865 810603 or email the LADO team: lado.safeguardingchildren@oxfordshire.gov.uk
- Service manager - Jo Lloyd.

- If the incident or concern is so serious as to warrant a police investigation, or a child has been placed at immediate risk of harm, the police will need to be contacted.

Procedure

7. Orchard Therapeutic Farm encourages the whistle-blower to raise the matter internally in the first instance with their line manager (or the Director if the line manager is the one under suspicion). In the instance where the Director is under suspicion or investigation matters would need to be raised to the Proprietors. This will allow them to right the wrong and explain the behaviour or activity. Alternatively, the whistle-blower may request a private and confidential meeting in the first instance with the person who is causing concern.
8. All matters will be treated in strict confidence and anonymity will be respected wherever possible. Written, dated and signed supporting evidence and statements should always be taken to any meetings if possible.

How will the matter be progressed?

- 9.** The individual(s) in receipt of the information or allegation (the investigating officer(s)) will carry out a preliminary investigation. This will seek to establish the facts of the matter and assess whether the concern has a foundation and can or should be resolved internally. The initial assessment may identify the need to involve third parties to provide further information, advice or assistance, for example, involvement of other members of provision staff, legal or personnel advisors and the Police.
- 10.** Records will be kept of work undertaken and actions taken throughout the investigation. This will all be documented. The investigating officer(s) will consider how best to report the findings and what corrective action needs to be considered. This may include some form of disciplinary action and/or third-party referral such as the Police.
- 11.** Depending on the nature of the concern or allegation and whether or not the investigating officer considers there to be a case to answer, the disciplinary procedure may be applied. In such cases any disciplinary action will be considered in line with the Orchard Therapeutic Farm disciplinary procedures.

Respecting confidentiality

- 12.** Wherever possible Orchard Therapeutic Farm seeks to respect the confidentiality and anonymity of the whistle-blower and will as far as possible protect him/her from reprisals. The provision will not tolerate any attempt to harass or victimise the whistle-blower, or attempts to prevent concerns being raised, and will consider any necessary disciplinary or corrective action appropriate to the circumstances.

Conclusion

Good practice will be established within Orchard Therapeutic Farm in terms of the systems of internal control, both financial and non-financial to ensure that cases of suspected fraud or impropriety will rarely occur and are swiftly identified. This Whistleblowing Policy is provided as a reference document to establish a framework within which issues can be raised confidentially. This document is a public commitment that concerns are taken seriously and will be actioned.