Whistle Blowing Policy

Policy Agreed: 13th October 2025

Review date: Autumn 2026

(Interim) Executive Head Teacher: Anthony David

Chair of Governors: Eric Sorenson

We believe that everyone is precious and loved by God. We aspire to let our light shine in all that we do. We nurture and empower one another to flourish. Together we shine in our world by showing compassion and by serving others. Let God's light shine through us.

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This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:

- Public Interest Disclosure Act 1998
- Employment Rights Act 1996
- Keeping children safe in education 2022
- GOV.UK (2012) 'Whistleblowing for employees'
- DfE (2014) 'Whistleblowing procedure for maintained schools'
- Sir Robert Francis (2015) 'Freedom to speak up report'
- DfE (2025) 'Keeping children safe in education 2025'

Summary
School employees are encouraged to bring to the Headteacher or Head of School's attention any misconduct, suspected misconduct, malpractice, illegal acts or child protection issues. Maintaining transparency reflects our school vision of 'doing what is right' and we aim to maintain a culture where colleagues feel they can safely report concerns.

In the case of whistleblowing where the subject is the Headteacher, staff should contact the Chair of the Governors. The Whistleblowing Policy has been developed so that staff will know how to raise concerns in the right way at an early stage, and that managers understand their responsibilities in relation to allegations of misconduct and impropriety.

Employees who make a disclosure reasonably believing that:
- A criminal offence has been committed, is being committed, or is likely to be committed;
- A person has failed, is failing, or is likely to fail to comply with any legal obligation to which they are subject;
- A miscarriage of justice has occurred, is occurring, or is likely to occur;
- The health or safety of any individual has been, is being, or is likely to be endangered;
- The environment has been, is being, or is likely to be damaged;
- Information tending to show any matter falling within any one of the preceding paragraphs has been, or is likely to be deliberately concealed, are protected by law (under the Public Interest Disclosure Act 1998) from any victimisation for having raised these issues; or
- The Prevent Duty is not being carried out and pupils and staff are at risk of radicalisation and extremism.

Standard
This policy should be used when employees have concerns that the interests of others or the school (and therefore its staff and pupils) are at risk, e.g.:
- Criminal activities and any activities, suspected or ongoing, which may break the law (including fraud or any form of child abuse);
- Disregard for legislation, policies and procedures;
- The mistreatment of a service user which may endanger the health and safety of that service user.

This list is not exhaustive.

Employees raising issues, and managers investigating them, will suffer no detriment as a result, provided they act in good faith – i.e., they genuinely believe that there is, or may be, substance in their allegations. The school will not tolerate any harassment or victimisation of a whistleblower (including informal pressures), and will treat this as a serious disciplinary offence, which will be dealt with under the Disciplinary Code. An employee whose concerns are raised under this procedure will receive the same protection from victimisation under the Public Interest Disclosure Act 1998.

Procedures
- An employee can raise concerns orally or, preferably, in writing.
- Any concerns raised by an employee will be dealt with promptly.

- The concerns will be considered as thoroughly as possible by the most relevant person, whether this is the Headteacher or the Chair of Governors.
- Employees have the right to seek assistance and advice from trade union representatives or colleagues, and to be accompanied by a trade union representative or colleague at all meetings held under this procedure.
- The school will not tolerate complaints which are deliberately made without substance, or are frivolous or malicious. Such cases will be dealt with very seriously and formal disciplinary action may be considered.

This policy does not restrict employees' rights to raise their concerns outside the school (e.g. with the Audit Commission, the Environment Agency, the Health and Safety , Channel panels/LA Prevent leads, or the police), but is intended to facilitate speedy internal investigation and resolve employees' concerns, so that they do not need to refer to external agencies.

Definitions

Whistle-blowing covers concerns made that report wrongdoing that is "in the public interest". Examples of whistle-blowing include (but are not limited to):

- Criminal offences, such as fraud or corruption
- Pupils' or staff health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment
- A whistle-blower is a person who raises a genuine concern relating to the above.

Concerns may include, but are not limited to: unlawful activity, financial malpractice, safeguarding breaches, misuse of digital technologies (including artificial intelligence systems), or any behaviour that contravenes the school's standards of integrity and conduct.

Not all concerns about the school count as whistle-blowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistle-blowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance.

When staff have a concern they should consider whether it would be better to follow our staff grievance or complaints procedures.

Responsibilities of the Headteacher and Chair of Governors

The Headteacher will:

- Deal promptly and fairly with any concerns raised under this policy in accordance with the procedure set out in Appendix 1;
- Make sure that the employee's concerns are appropriate for consideration under this policy as against another procedure: e.g., grievance or disciplinary procedures. If the concerns are not appropriate to this policy, refer them to the correct procedure;
- Immediately refer matters concerning Child Protection or fraud to the appropriate external agency;
- Support and facilitate the employee in pursuing whistleblowing concerns;
- Maintain confidentiality throughout any proceedings;
- As far as possible, withhold the identity of the employee who has raised the concerns, if the employee has so requested (the Headteacher / Chair of Governors may be obliged in some circumstances to reveal the name of the employee who has raised concerns, in which event the situation should be discussed with the employee before proceeding);

- Keep the employee apprised of progress in investigating and resolving their concerns;
- Advise the employee that they have the right to bring a trade union representative or a colleague / friend to any meetings under this policy;
- Implement any actions / recommendations arising from the investigation into the employee's concerns;
- Not allow the employee to suffer any detriment as a result of raising their concerns (to do so would be unlawful under the Public Interest Act 1998); and
- Investigate anonymous complaints as far as practicable.

Employees' Responsibility

Employees must:

- Raise concerns (orally or in writing) in confidence with the () Headteacher (or in the case of the () Headteacher being the person involved and the Chair of Governors) at the earliest possible moment.
- Never carry out their own investigation;
- Assist with any investigation into their concerns, including attendance at meetings, replying to requests for information, and providing signed statements as appropriate;
- Pass any evidence to the person investigating;
- Follow the stages of the procedure in correct sequence;
- Always act honestly and in good faith when raising and pursuing concerns through this policy, and
- Inform the investigating manager / official if they have a personal interest in the matters under investigation.

Or, if none of the above are possible, use the OFSTED Whistleblowing Hotline or the Fraud and Whistleblowing hotline.

Employees are encouraged to raise "whistleblowing" concerns, in the first instance, via this policy rather than going straight to external agencies. Reporting concerns to (e.g., the press) may seriously undermine any investigation into the issues of concern.

Advice can be obtained from a trade union representative or "Public Concern at Work" (telephone: 020 7404 6609; web: www.pcaw.co.uk), an independent charity which gives advice on how to raise concerns about serious malpractice at work.

Appendix 1
Raising concerns internally
Step 1

1. The employee may raise their complaints orally or, preferably, in writing to the Head Teacher and detail the issues about which they are concerned.

2. If it is not appropriate to raise these concerns with an appropriate manager (e.g., because they are about that manager's conduct), the employee may refer matters to the next most senior manager, Chair of Governors, and so on.

3. The manager will confirm that the employee's concerns are appropriate to this procedure; if not, the employee should be transferred to the appropriate procedure.

4. The manager will meet the employee as a priority and gather as much information as possible.

5. The manager will assess what action is necessary to investigate and respond to the employee's concerns. They will write to the employee within five days of the meeting summarising the employee's concerns and informing them as to how these will be investigated. The manager will also inform the employee of the timescales within which the investigation will be completed.

6. When considering the action needed to investigate and address the employee's concerns, the manager may seek advice and direction from appropriate agencies.

7. The employee will be informed in writing of the outcome of the investigation. The employee will receive as much feedback as possible, subject to the school's duty of confidence to other parties who may be involved.

Step 2

1. The employee may proceed to step 2 and refer their concerns to the Chair of Governors, if they:
   - Remain dissatisfied with the response in Step 1, or
   - Have not received a response to their concerns within the timescales set out by the manager in Step 1.

2. The Chair of Governors will take appropriate actions, such as:
   - Reviewing the investigation to date and giving instructions on its further conduct;
   - Assuming responsibility for an investigation in progress;
   - Initiating an investigation;
   - Delegating an investigation to an appropriate external agency

3. The Chair of Governors will inform the employee in writing about action to progress the investigation, with timescales and/or their decision in relation to the employee's further representations. The employee will receive as much feedback as possible, subject to the school's duty of confidence to other parties who may be involved.