



## WHISTLEBLOWING POLICY

### 1. Purpose

The School is committed to conducting its affairs with honesty, integrity, openness and accountability. Workers are encouraged to raise genuine concerns about wrongdoing, risk, malpractice, safeguarding failures, unlawful conduct or other concerns in the public interest.

The School recognises that workers are often the first to identify concerns and encourages a culture in which concerns can be raised openly and without fear of reprisal.

This policy aims to:

- encourage workers to raise concerns at the earliest opportunity;
- provide clear procedures for reporting concerns;
- ensure concerns are taken seriously and investigated appropriately;
- protect individuals who raise concerns in good faith from victimisation, retaliation or detriment;
- support compliance with legal and regulatory duties, including safeguarding and equality obligations.

The School is committed to creating and maintaining a culture in which workers feel safe to speak up about concerns relating to safeguarding, professional conduct, equality, harassment, sexual harassment, health and safety, financial wrongdoing or any practice that may place individuals at risk

### Preface

This policy has regard to the advice and guidance available as follows:

| Source                                                                            | Title                                                                  | Link                                                                                                                                                                                                                                                                             |
|-----------------------------------------------------------------------------------|------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Legislation                                                                       | Employment Rights Act 1996 and 2025                                    | <a href="https://www.legislation.gov.uk/ukpga/1996/18/contents">https://www.legislation.gov.uk/ukpga/1996/18/contents</a><br><a href="https://www.legislation.gov.uk/">https://www.legislation.gov.uk/</a>                                                                       |
| Legislation                                                                       | Govt Guidance on Whistleblowing for                                    | <a href="https://www.gov.uk/whistleblowing">https://www.gov.uk/whistleblowing</a>                                                                                                                                                                                                |
| Legislation                                                                       | Public Interest Disclosure Act 1998                                    | <a href="https://www.legislation.gov.uk/ukpga/1998/23/contents">https://www.legislation.gov.uk/ukpga/1998/23/contents</a>                                                                                                                                                        |
| Legislation                                                                       | Equality Act 2010 and Worker Protection amendment of Equality Act 2023 | <a href="https://www.legislation.gov.uk/ukpga/2010/15/contents">https://www.legislation.gov.uk/ukpga/2010/15/contents</a><br><a href="https://www.legislation.gov.uk/ukpga/2023/51/contents">https://www.legislation.gov.uk/ukpga/2023/51/contents</a>                           |
| DFE                                                                               | KCSIE 2026                                                             | <a href="https://www.gov.uk/government/publications/keeping-children-safe-in-education">https://www.gov.uk/government/publications/keeping-children-safe-in-education</a>                                                                                                        |
| ACAS                                                                              | Whistleblowing Guidance and Harassment law Changes                     | <a href="https://www.acas.org.uk/whistleblowing-at-work">https://www.acas.org.uk/whistleblowing-at-work</a><br><a href="https://www.acas.org.uk/employment-rights-act-2025/harassment-law-changes">https://www.acas.org.uk/employment-rights-act-2025/harassment-law-changes</a> |
| This policy also complies with our funding agreement and articles of association. |                                                                        |                                                                                                                                                                                                                                                                                  |



## **2. Scope**

This policy applies to all employees, workers, volunteers, governors, agency workers, contractors and others working on behalf of the School.

For the purposes of this policy, the term **"worker"** includes employees, workers, agency workers, volunteers, governors, contractors and any other individual carrying out work or services on behalf of the School, except where the context requires otherwise.

The policy should be read alongside:

- Safeguarding and Child Protection Policy
- Code of Conduct
- Managing Allegations of Abuse Against Workers, Volunteers and Supply Teachers Policy
- Harassment, Sexual Harassment and Dignity at Work Policy
- Grievance Procedure
- Disciplinary Procedure
- Equality, Diversity and Inclusion Policy
- Health and Safety Policy

## **3. What is Whistleblowing?**

Whistleblowing is the disclosure of information which an individual reasonably believes shows that wrongdoing has occurred, is occurring, or is likely to occur.

Examples include:

- criminal offences;
- fraud, corruption or financial malpractice;
- breaches of legal or regulatory obligations;
- breaches of safeguarding requirements;
- risks to health and safety;
- damage to the environment;
- serious misconduct;
- serious breaches of equality legislation;
- systemic bullying, harassment, sexual harassment or victimisation;
- failure to take appropriate action in response to safeguarding concerns;
- failure to take reasonable or all reasonable steps to prevent harassment;
- failure to address harassment by pupils, parents, carers, visitors, contractors or other third parties;
- deliberate concealment of any of the above.

A whistleblowing concern may relate to past, current or anticipated wrongdoing.

## **4. Whistleblowing and Personal Employment Concerns**



This policy is not normally intended for complaints relating solely to an individual's own employment circumstances.

Personal concerns relating to pay, terms and conditions, promotion, workload, relationships at work or other employment matters should usually be raised through the Grievance Procedure or other appropriate procedures.

However, concerns may amount to whistleblowing where they indicate a wider public interest issue, including:

- systemic discrimination;
- repeated or widespread harassment;
- organisational failures in safeguarding;
- unlawful practices affecting multiple individuals;
- failures to comply with legal duties;
- risks to the welfare of workers, pupils or others.

Where appropriate, concerns may be managed under more than one policy simultaneously.

## **5. Safeguarding Concerns**

Nothing in this policy replaces safeguarding reporting requirements.

Concerns relating to the safety, welfare or protection of children must be reported immediately in accordance with the School's Safeguarding and Child Protection Policy and the Managing Allegations Procedure.

Where appropriate, safeguarding concerns may also constitute whistleblowing concerns and may be considered under both processes.

## **6. Third-Party Harassment and Organisational Culture**

The School is committed to providing a safe, respectful and inclusive environment.

Whistleblowing concerns may include situations where there is evidence that the School has failed to take appropriate steps to prevent, address or respond to harassment, discrimination or victimisation experienced by workers from:

- colleagues;
- managers;
- governors;
- pupils;
- parents or carers;
- visitors;
- contractors;
- consultants; or
- other third parties.

Concerns regarding organisational culture, repeated failures to address inappropriate behaviour, or failures to comply with equality and safeguarding obligations may fall within the scope of this policy



## **7. Raising a Concern**

Concerns should be raised as soon as possible.

A concern may be raised verbally or in writing and should include:

- the nature of the concern;
- relevant facts and dates;
- names of those involved (where known);
- any supporting evidence available;
- details of any action already taken.

Workers may raise concerns with:

- their line manager;
- the Headteacher;
- the Co-Headteacher;
- the Head of HR;
- the Designated Safeguarding Lead (where relevant);
- the Chair of Governors.

Where the concern relates to any of the above individuals, workers should report directly to the Chair of Governors.

## **8. Investigation of Concerns**

The School will acknowledge concerns promptly and determine the most appropriate course of action.

This may include:

- informal enquiries;
- a formal investigation;
- referral under safeguarding procedures;
- referral to disciplinary procedures;
- referral to external agencies, regulators or statutory authorities.

The School will seek to keep the individual informed of progress where appropriate, although confidentiality and legal requirements may limit the information that can be shared.

## **9. Confidentiality**

The School will make every effort to protect the identity of an individual who raises a concern.

However, it may not always be possible to guarantee anonymity where disclosure is required by law, safeguarding obligations, regulatory requirements or the needs of an investigation.

Individuals are encouraged to identify themselves whenever possible, as anonymous concerns can be more difficult to investigate.



## **10. Protection from Detriment and Victimisation**

The School is committed to ensuring that no person who raises a genuine concern in good faith suffers any detriment as a result.

The School will not tolerate:

- victimisation;
- retaliation;
- bullying;
- harassment;
- intimidation;
- threats;
- exclusion from opportunities;
- unfair treatment;
- unjustified disciplinary action.

Any employee who subjects another person to such treatment may be subject to disciplinary action.

Protection applies regardless of whether the concern is ultimately substantiated, provided that it was raised honestly and in good faith.

## **11. Malicious or Knowingly False Allegations**

Individuals raising concerns are expected to do so honestly and in good faith.

If an allegation is deliberately false, malicious or made for personal gain, disciplinary action may be taken.

A concern that is raised in good faith will not attract any penalty simply because it is not subsequently upheld.

## **12. External Disclosure**

The School encourages concerns to be raised internally wherever possible.

However, individuals may disclose concerns to an appropriate prescribed body where this is permitted by whistleblowing legislation.

Depending on the nature of the concern, this may include:

- the Local Authority;
- Ofsted;
- the Health and Safety Executive;
- the Equality and Human Rights Commission;
- the Charity Commission;
- the Information Commissioner's Office;
- other prescribed regulators.

Independent advice may also be sought from Protect, the whistleblowing charity



### **13. Monitoring and Review**

The Governing Board will oversee the effectiveness of this policy.

An anonymised annual report will be provided to governors summarising:

- the number of whistleblowing concerns raised;
- themes and trends identified;
- outcomes;
- safeguarding-related concerns;
- harassment and discrimination concerns;
- lessons learned and actions taken.

The policy will be reviewed regularly to ensure compliance with legal and regulatory requirements and to reflect best practice.