

Whistleblowing Policy (Whole School)	7 b
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Responsible for Initiating Review of Policy	Director of Finance and Operations
Committee to Review	SLT
Last Review Date	July 2025
Review Period	2 years (annual update to reflect statutory changes)
Approved by (Committee and Date)	SLT July 2025
Approved by Board of Governors	<i>Scheduled Autumn term 2025</i>
Effective Date of Policy	July 2025
Next Review Date	July 2027
Related Policies	7a Safeguarding Policy 7f Whole School Pastoral Care 7i Confidentiality Policy 9a Behaviour Policy 11g Use of Mobile Phones by Staff 18a Safer Recruitment Policy 32c ICT Acceptable Use Policy – Staff 32e Use of Social Networking Sites 32f Use of Email and Internet at Work 32g Use of Privately Owned Devices Staff Code of Conduct

WHISTLEBLOWING

The concept of whistleblowing is a key part of the structures and procedures that ensure the safeguarding, welfare, health and safety of all members of the school community. In this context the School has full regard to Keeping Children Safe in Education – September 2025 (KCSIE Sept 25) In particular, this policy is intended to address safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors. The policy should be read alongside the school's safeguarding policy.

Additionally, this policy enables staff to raise concerns internally and in confidence about fraud, malpractice, health and safety, criminal offences, a failure to comply with legal obligations, inappropriate behaviour or unethical conduct. The policy also provides, if necessary, for such concerns to be raised outside the school.

This procedure is separate from our adopted procedures regarding grievances. Staff should not use the whistleblowing procedure to raise concerns relating to their own personal circumstances, such as the way they have been treated at work. In those cases, the Grievance Procedure, Anti-Harassment and Bullying Policy or Prevention of Sexual Harassment Policy should be used. If staff are uncertain whether something is within the scope of this procedure, they should first seek advice from the Head or the Director of Finance and Operations. .

What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or malpractice. 'Malpractice' is not easily defined; however, it includes allegations of misconduct, fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of conduct, criminal activities, or failing to comply with a legal obligations.

A **whistleblower** is a person who raises a genuine concern relating to suspected malpractice within the School. If staff have any genuine concerns related to suspected malpractice affecting any of the School's activities (a whistleblowing concern), they should report it under this procedure.

If staff feel unable to raise an issue with the school or feel that genuine concerns are not being addressed, they may report concerns through other whistleblowing channels, such as:

- The NSPCC whistleblowing helpline (tel: 0800 028 0285 or email: help@nspcc.org.uk).
- Protect, an independent whistleblowing charity (helpline: 020 3117 2502, email: whistle@protect-advice.org.uk , website: <https://protect-advice.org.uk/>).

Policy

The School is committed to the highest standards of openness, integrity and accountability for all of its staff and students.

In line with this commitment, the school encourages anyone with any concerns about any aspect of the school's activities to come forward and voice those concerns.

This applies equally to concerns about safety, the activities of students, staff and anyone else in their dealings with the school.

All members of the school community are valued highly and we encourage reflection on all aspects of our practice.

The procedures associated with this policy:

- Provide the basis on which individuals can raise any such concerns they may have, and receive feedback on action taken.
- Allows individuals to take any matter raised further if they are dissatisfied with the School's response.
- Gives protection from reprisals or victimisation for 'whistleblowing' in good faith.
- This policy applies to all members of the School community.

Procedures

There are existing procedures in place to enable students, staff and parents to make complaints about individual and particular matters. (See Complaints Procedure).

These procedures are intended to cover concerns that fall outside the scope of individual complaints.

The concern may be about something that:

- is unlawful;
- is against the policies of the School;
- amounts to improper conduct;
- seems likely to harm somebody or the environment;
- represents a cover-up of these sorts of issues.

However, the school encourages all members of the school community to raise any concerns that they have, no matter how minor they may appear to be, so that action may be taken to ensure that issues do not escalate. The School values all members of the school community equally highly and is committed to ensuring reflective practice at all times.

Safeguards:

Low-level Concerns – (also see 7a Safeguarding)

Some concerns or allegations may not meet the harm threshold. However, in order to create an open and transparent culture of safeguarding in the school, staff are encouraged to pass on any concerns they may have about all adults working with children, no matter how small, and even if no more than something causing a sense of unease or ‘nagging doubt’ that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work;
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- using inappropriate sexualised, intimidating, humiliating or offensive language.

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 these ‘low level concerns’ are reported. They will be recorded, dealt with effectively and sensitively, and should also protect those working in or on behalf of the school from potential false allegations or misunderstandings.

If the concern has been raised by a third party, the Head will collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously, and to the individual involved and any witnesses.

Staff should also feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

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Staff code of conduct, whistleblowing and behaviour policies are designed to achieve the following:

- to ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- to ensure that staff feel empowered to share any low-level safeguarding concerns
- to address unprofessional behaviour and supporting the individual to correct it at an early stage
- to handle and respond to such concerns sensitively and proportionately when they are raised, and
- to help identify any weakness in the school's safeguarding system.

The school will take the following actions in relation to low level concerns and/or allegations which do not meet the 'harm' threshold:

- All low-level concerns will be recorded in writing.
- The record will include details of the concern, the context in which the concern arose, the investigation(s) carried out 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 information collected will help to categorise the type of behaviour and determine what further action may need to be taken.
- These records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- As part of the annual review of safeguarding, these records will be reviewed at least annually so that potential patterns of concerning, problematic or inappropriate behaviour can be identified – which will be addressed either through the school's disciplinary procedures or (where a pattern of behaviour moves from a concern to meeting the harms threshold) after referral to the LADO.
- Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur. Amendments to policies and training will be considered to minimise the risk of it happening again.
- Reports about supply staff and contractors will be notified to their employer so that any potential patterns of inappropriate behaviour can be identified.
- Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding, and not to misconduct or poor performance, should not be referred to in a reference.
- When appropriate, follow-up conversations will take place with the relevant member of staff. The Head has overall responsibility for handling concerns about staff, but in accordance with the local safeguarding guidance, may delegate follow-up conversations to the DSL or Designated Safeguarding Governor.

Harassment or victimisation

It is understandable that staff are sometimes worried about possible repercussions as a result of a raising a whistleblowing disclosure. We aim to encourage openness and will support staff if they raise genuine concerns under this policy, even if they turn out to be mistaken.

Staff will not suffer a detriment or be disciplined for raising a genuine and legitimate concern, provided they do so in good faith and following the whistleblowing procedures. If they believe that they have suffered any such treatment, they should inform the Head or Director of Finance and Operations immediately. If the matter is not remedied, they may raise it formally using our Grievance Procedure.

Staff must not threaten or retaliate against whistleblowers in any way. If staff are involved such conduct, they may be subject to disciplinary action

Confidentiality

Staff are encouraged to raise whistleblowing concerns openly under this procedure.

However, if staff wish to raise a concern confidentially, every effort will be made to keep your identity confidential. If it is necessary for anyone investigating the concern to know your identity, this will be discussed with you.

If there is evidence of criminal activity, the Police will be informed in all cases.

We do not encourage you to make disclosures anonymously as proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should discuss this with the Head or Director of Finance and Operations and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are set out above.

Untrue allegations

If an allegation is made in good faith, but is not confirmed by the investigation, no action will be taken against the individual. However, if individuals make allegations that are malicious or vexatious, disciplinary action is likely.

How to raise a concern

The sooner individuals express their concern the easier it is to take action.

As a first step:

- A pupil should normally raise concerns with their form Tutor, Class Teacher, DSL or with the Deputy Head of Preparatory School or Assistant Head Pastoral and Boarding; in some situations, it could be raised with the Head depending on the seriousness and sensitivity of the issues involved and who is thought to be involved.
- An employee should normally raise concerns with the Head however if these relate to the Head then they should be raised directly with the Chair of Governors. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. Employees who feel that they cannot approach management in the school should approach the Chair of Governors.

Concerns can be raised verbally but are better raised in writing. This should set out the background and history of the concern, giving names, dates and places where possible, and the reason why the employee is concerned about the situation.

How will the school respond?

The action taken by the School will depend on the nature of the concern. The matters raised may for example:

- be investigated internally;
- be referred to external agencies.

The Head or appropriate member of School staff will respond in writing to the individual who raised the issue within 10 working days of a concern being received.

When any meeting is arranged with the individual, they will be given the right to be accompanied by a friend, work colleague or union representative who is not involved in the incident to which the concern relates.

The School accepts that individuals need to be assured that the matter has been properly addressed. Therefore, subject to any legal or contractual constraints and the necessary timespan to investigate the issue thoroughly, individuals will receive information about the outcomes of any investigations.

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. You will be kept informed of the progress of the investigation

and its likely timescale. Whenever possible and subject to third party rights, you will be informed of the resolution. However, sometimes the need for confidentiality may prevent us giving specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If you are not satisfied that your concern is being properly dealt with, you will have a right to raise it in confidence with the Chair of Governors. . Alternatively, you can follow the external procedure below.

External Procedures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing within the School. In most cases you should not find it necessary to alert anyone externally.

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where you may be entitled to raise a concern directly with an external body where you reasonably believe:

- that exceptionally serious circumstances justify it;
- that we would conceal or destroy the relevant evidence;
- that you would be victimised

We strongly encourage you to seek advice before reporting a concern to anyone externally. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.