



WHISTLEBLOWING POLICY & PROCEDURE

POLICY NAME	Whistleblowing Policy	POLICY OWNER	C Beaty-Pownall, Director of People
APPROVED BY	Governance Committee	DATE APPROVED	May 2026
DATE OF LAST REVIEW	April 2026	DATE OF NEXT REVIEW	May 2027
SOURCE DOCUMENT	ISBA template – Staff Handbook, March 2026		

We have adopted this policy and the accompanying procedure on whistleblowing to enable you to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, a failure to comply with legal obligations, inappropriate behaviour, unethical conduct or sexual harassment. The policy also provides, if necessary, for such concerns to be raised outside the organisation.

About this Policy

We are committed to conducting our business with honesty and integrity and expects you and all staff to maintain high standards in accordance with our Staff Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring malpractice, illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

Aims

Our policy on whistleblowing is intended to demonstrate that we:

- will not tolerate malpractice;
- encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that your concerns will be taken seriously and investigated, as appropriate;
- respect your confidentiality if you raise concerns and we will provide procedures to maintain your confidentiality so far as is consistent with progressing the issues effectively;
- will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;

- will only invoke the School's Disciplinary Procedure in the case of false, malicious, vexatious or frivolous allegations. The policy seeks to reassure you that you can raise genuine concerns without fear of reprisal, even if you turn out to be mistaken; and
- will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

Scope of this policy

This procedure is separate from our adopted procedures regarding grievances. You should not use the whistleblowing procedure to raise concerns relating to your own personal circumstances, such as the way you 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, as appropriate. If you are uncertain whether something is within the scope of this procedure, you should first seek advice from the Director of People.

This procedure has been implemented to enable you to express a legitimate concern regarding suspected malpractice within the School.

What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing, malpractice or dangers at work.

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

If you feel unable to raise an issue with us or feel that their genuine concerns are not being addressed, you may report your concerns to other whistleblowing channels, such as:

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

What is suspected malpractice?

'Malpractice' is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of ethics, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment (negligence).

You are not required to obtain evidence of malpractice before raising your concern. As such you must not commit an act or acts of misconduct, breach School rules or damage the School in any way in order to obtain information. The School is committed to ensuring that you work in an environment in which you can raise concerns and there is no question of you having to prove anything. The School will support employees, who with the reasonable belief that it is in the public interest to do so raise concerns under this policy, even if they turn out to be mistaken.

Confidentiality

We hope that you will feel able to voice whistleblowing concerns openly under this procedure. However, if you wish to raise a concern confidentially, we will make every effort to keep your identity

secret. 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. However, 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 Headmaster, Bursar or Director of People 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.

Raising a whistleblowing concern

We hope that in most cases you will be able to raise any concerns with your line manager. Concerns can be raised in person or in writing if preferred. It may be possible to agree a way of resolving your concern quickly and effectively.

However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you are at liberty to raise a whistleblowing concern with the Head, Bursar or the Director of People directly. If you feel unable to approach Head, Bursar or the Director of People directly, then the Chair of Governors should be the first point of contact.

A meeting will be arranged with you as soon as possible to discuss your concern. You may bring a colleague or trade union representative to any meetings under this procedure. Any companion must respect the confidentiality of the disclosure and any subsequent investigation. You may be required to attend additional meetings in order to provide further information as the concerns raised are investigated.

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 Governing Body via the Clerk to 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.

However, if all internal procedures have been exhausted or you feel you cannot raise your concerns internally and you honestly and reasonably believe the information and any allegations are true, you should consider raising the matter with an appropriate 'prescribed person'. The identity of the appropriate prescribed person will depend on the nature of your concern. However, they must be one

of those prescribed by an order made by the Secretary of State for the purposes of the Employment Rights Act 1996 Section 43F. The Public Interest Disclosure (Prescribed Persons) Order 2014 (as amended) lists the prescribed persons. This may include (depending on the subject matter of the disclosure) HMRC, the Audit Commission, the Health and Safety Executive and/or the Local Authority Designated Officer (where the disclosure relates to a child protection issue).

It will very rarely, if ever, be appropriate for you to alert the media. However, whistleblowers who make wider disclosures of this type will only be protected in certain circumstances. The School recommends that you take legal advice before following this course of action since we believe it will be in your own interests to do so.

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 by us; or
- where the Secretary of State has ordered it.

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.

Malicious Accusations

False, malicious, vexatious or frivolous accusations will be dealt with under our Disciplinary Procedure.

Protection from Reprisal 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 you if you raise genuine concerns under this policy, even if you turn out to be mistaken.

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

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

Record of whistleblowing concerns

The Director of People will keep a confidential record of all concerns raised under this procedure and the steps taken by the School to deal with the concerns raised. Any member of staff or governor who receives a complaint in accordance with this procedure must log that complaint with the Director of People for recording purposes.