

Duke of Bedford Primary School

Whistleblowing Policy

Date approved: July 2025



Whistle-Blowing Policy and Procedure

1. Purpose

- 1.1. To set out the Governing Board's policy and procedure for dealing with concerns raised by employees which relate to suspected wrongdoing or dangers at work (see paragraph 3). Allegations of child abuse against teachers and other staff and volunteers is to be dealt with in accordance with Keeping Children Safe in Education statutory guidance for schools and colleges.

2. Background

- 2.1. As employees are often the first to realise that there may be something wrong within the school, it is important that they feel able to express their concerns without fear of harassment or victimisation. Otherwise, they may find it easier to ignore the concern rather than report it. The Public Interest Disclosure Act 1998 recognises this fact and is designed to protect employees, who make certain disclosures of information in 'the public interest', from detriment and/or dismissal. This policy builds on the provisions of the Act.
- 2.2. The Governing Board is committed to the highest possible standard of operation, probity and accountability. In line with that commitment, employees, officers, consultants, contractors, volunteers, casual workers and agency workers with serious concerns are encouraged to come forward and voice those concerns. This policy document makes it clear that employees can do so without fear of reprisals; it is intended to encourage and enable employees to raise serious concerns within the school rather than overlooking a problem or alerting anyone external to the school.
- 2.3. This policy does not form part of any employee's contract of employment and it may be amended at any time.

3. Aims of the Policy

- 3.1. This policy aims to:
 - provide avenues for employees to raise concerns internally as a matter of course, and receive feedback on any action taken
 - provide for matters to be dealt with quickly and appropriately, and ensure that concerns are taken seriously and treated consistently and fairly
 - reassure employees that they will be protected from reprisals or victimisation for whistle-blowing where they have a genuine concern
 - allow employees to take the matter further if they are dissatisfied with the Governing Board's response.

- 3.2. A **whistleblower** is a person who raises a genuine concern relating to the matters below. If employees have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) they should report it under this policy. **Whistleblowing** is the disclosure of information which relates to suspected wrongdoing that is “in the public interest”. This may include but is not limited to :
- criminal offences such as fraud or corruption
 - miscarriages of justice
 - pupil or staff health and safety being put in danger
 - damage to the environment
 - failure to comply with any legal or professional obligation or statutory requirements
 - financial fraud or mismanagement
- conduct likely to damage our reputation
- unauthorised disclosure of confidential information
 - public examination fraud
 - the deliberate concealment of any of the above matters.
- 3.3. Before initiating the procedure employees should consider the following:
- the responsibility for expressing concerns about unacceptable practice or behaviour rests with all employees
 - employees should use line manager or team meetings and other opportunities to raise questions and seek clarification on issues which are of day-to-day concern
 - whilst it can be difficult to raise concerns about the practice or behaviour of a colleague, employees must act to prevent an escalation of the problem and to prevent themselves being potentially implicated.
- 3.4. This policy should not be used for complaints about an employee’s personal circumstances, such as the way they have been treated at work. In these cases an employee should use the school’s Grievance Procedure (or anti-harassment and bullying policy as appropriate); if the matter relates to salary, the salary review procedures documented in the school’s pay policy.

4. Safeguards

4.1. Harassment or Victimisation

4.1.1. The Governing Board recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The Governing Board will not tolerate harassment or victimisation and will take action to protect employees when they have a genuine concern.

4.1.2. This does not mean that if an employee is already the subject of internal procedures such as disciplinary or redundancy, that those procedures will be halted as a result of that employee raising a concern under the whistleblowing policy.

4.2. Confidentiality

4.2.1. We hope that employees will feel able to voice whistleblowing concerns openly under this policy. The Governing Board will make every effort to protect an employee's identity if confidentiality is requested.

4.2.2. As indicated above, identity will be protected as far as possible, but should the investigation into the concern require the employee to be named as the source of the information, that this will be discussed with the employee before their name is disclosed.

4.3. Anonymous Allegations

4.3.1. Employees are encouraged to put their name to an allegation. Proper investigation may be more difficult or impossible if we cannot obtain further information and it is also more difficult to establish whether allegations are credible. Anonymous allegations will be considered at the discretion of the Governing Board. In exercising the discretion, the factors to be taken into account would include:

- the seriousness of the issues raised
- the credibility of the concern
- the likelihood of confirming the allegation from attributable sources.

4.4. Untrue Allegations

4.4.1. If an employee makes an allegation where they have a genuine concern, but it is not confirmed by the investigation, no action will be taken against that employee. If, however, we conclude that an employee has made malicious or vexatious allegations, or with a view to personal gain, disciplinary action may be taken against that employee.

4.5. Unfounded Allegations

- 4.5.1. Following investigation, allegations may be confirmed as unfounded. This outcome will be notified to the employee who raised the concern, who will be informed that the Governing Board deems the matter to be concluded and that it should not be raised again unless new evidence becomes available.

4.6. Support to Employees

- 4.6.1. It is recognised that raising concerns can be difficult and stressful. Advice and support will be made available, as appropriate, to both the employee/s raising the concerns and any employee/s subject to investigation.

5. How to raise a Concern

- 5.1. As a first step, an employee should normally raise concerns with the headteacher. If the concern is about the headteacher, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the Chair of Governors. An employee (including the Headteacher and members of the leadership team) can by-pass the direct management line and the Governing Board if they feel the overall management and Governing Board of a school is engaged in an improper course of action. In this case please refer to section 7 below.
- 5.2. Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter. If an employee does not feel able to put the concern in writing, they should telephone or meet the appropriate person. It is important that however, the concern is raised, the employee makes it clear that they are raising the issue via the whistle-blowing procedure.
- 5.3. The earlier an employee expresses the concern, the easier it is to take action.
- 5.4. Although an employee is not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for the concern.
- 5.5. In some instances, it may be appropriate for an employee to ask the trade union to raise a matter on the employee's behalf.
- 5.6. At each meeting under this policy, the employee may bring a colleague or trade union representative. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

6. Investigating the concern

When a concern is received by the headteacher – referred to from here as the ‘recipient’ – they will:

- 6.1 Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative
- 6.2 Get as much detail as possible about the concern at this meeting, and record the information. If it becomes apparent the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure
- 6.3 Reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken (see section 6 of this policy)
- 6.4 Establish whether there is sufficient cause for concern to warrant further investigation. If there is:
 - 6.5 The recipient should then arrange a further investigation into the matter. In some cases, they may need to bring in an external, independent body to investigate. In others, they may need to report the matter to the police
- 6.6 The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps

7. Outcome of the investigation

Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether or not a referral is required to an external organisation, such as the local authority or police.

They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.

Beyond the immediate actions, the headteacher, Governing Board and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

- 7.1 Within ten working days of a concern being received, the manager receiving the concern must write to the employee:
 - acknowledging that the concern has been received
 - indicating how they propose to deal with the matter
 - giving an estimate of how long it will take to provide a final response
 - telling the employee whether any initial enquiries have been made

- telling the employee whether further investigations will take place, and if not why not
- letting the employee know when they will receive further details if the situation is not yet resolved.

6. Raising Concerns Outside the School

6.1. The aim of this policy is to provide an internal mechanism for reporting, investigation and remedying any wrongdoing in the workplace. In most cases, the employee should not find it necessary to alert anyone externally. The law recognises that in some circumstances it may be appropriate for the employee to report their concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. Employees are strongly encouraged to seek advice before reporting a concern to anyone external. If an employee is not satisfied with the Governing Board's response, the manager should ensure that they are made aware with whom they may raise the matter externally:

- 'Protect'
- Tel no: 0203 117 2520 *;

- Recognised Trade Union;
- Senior LA Officer;
- External Auditor;
- Relevant professional bodies or regulatory organisations;
- Solicitor.

- 7.2 The manager should stress to the employee that if they choose to take a concern outside the school, it is the employee's responsibility to ensure that confidential information is not disclosed, i.e. confidential information, in whatever format, is not handed over to a third party.

*Protect is a registered charity that employees can contact for advice to assist them in raising concerns about poor practice at work. The charity also provides advice to employers as to the possible ways to address these concerns.

- 7.3 Concerns about safeguarding practices can be raised externally using the NSPCC whistleblowing helpline. Employees can call 0800 028 0285 or email help@nspcc.org.uk.

[Whistleblowing: list of prescribed people and bodies - GOV.UK](#)

8. Monitoring and Review

The Headteacher will be responsible for monitoring the implementation and effectiveness of this policy/procedure. The policy/procedure will be reviewed by the Governing Board as necessary.