

WHISTLEBLOWING POLICY

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MONITORING AND REVIEW

Staff Responsible	Deputy Head
Reviewed by	SLT
Approved by	SLT
Frequency of Review	Annually
Date of Last Review	March 2026
Date of Next Review	March 2027

The School refers to all staff and students in St Mary's School, which includes the Early Years/Foundations Stage (EYFS), the Preparatory Department (Years 1-6), Senior House (Years 7-11) and the Sixth Form (Years 12-13).

The term 'parent' refers to those who have parental responsibility for a child.

INTRODUCTION

This policy applies to all staff, volunteers and contractors, paid and unpaid, working in St Mary's School, including governors. Training is provided on whistleblowing as part of the safeguarding and child protection training regularly provided by the school. The school has adopted this policy and the accompanying procedure on whistleblowing to enable members of staff 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 or unethical conduct. The policy also provides, if necessary, for such concerns to be raised outside the

organisation. Members of staff must acknowledge their individual responsibilities to bring matters of concern, including low-level concerns, to the attention of senior management and/or relevant agencies. Although this can be difficult, this is particularly important where the welfare of children may be at risk.

AIMS

Aims The School's policy on whistleblowing is intended to demonstrate that it:

- will not tolerate malpractice;
- encourages staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated, as appropriate;
- encourages a culture of safety and of raising concerns;
- encourages a culture of valuing staff and of reflective practice;
- respects the confidentiality of staff raising concerns and will provide procedures to maintain 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 staff that they can raise genuine concerns without fear of reprisal, even if they turn out to be mistaken; and
- will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

WIDER REFERENCES

This policy operates within a wider national framework, which includes:

- Keeping Children Safe in Education 2025
- Whistleblowing: Guidance for Employers and Code of Practice 2015
- <https://www.gov.uk/whistleblowing>
- <https://www.nspcc.org.uk/search/?query=whistleblowing>
- <https://protect-advice.org.uk/>

RELATED POLICY

This policy should be read in conjunction with:

- Child Protection (Safeguarding) Policy
- Staff Code of Conduct
- Health and Safety Policy
- Grievance Procedure

WHAT IS A WHISTLE-BLOWER?

A whistle-blower is a member of staff who reports certain types of wrongdoing. This will usually be something which has been seen in school - though not always. The disclosure of wrongdoing must be in the public interest. This means it must affect others, e.g. the general public.

A whistle-blower is protected by law. Should a member of staff ever feel they are obliged to “blow the whistle” they will not – indeed under law *cannot* – be treated unfairly or lose their job (see link) because they have exercised their rights under this legislation.

Staff can raise concerns at any time about an incident that happened in the past, is happening now, or they believe will happen in the near future.

COMPLAINTS THAT COUNT AS WHISTLE-BLOWING

Staff are protected by law if they report any of the following:

- a criminal offence, e.g. fraud
- someone’s health and safety in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the school is breaking the law,
- they believe someone is covering up wrongdoing

COMPLAINTS THAT DON'T COUNT AS WHISTLE-BLOWING

Personal grievances (e.g. bullying, harassment, discrimination) are not covered by whistle-blowing law, unless a particular case is in the public interest.

Staff should report these under the school’s Grievance Procedure.

SAFEGUARDING CONCERNS

If a member of staff has concerns about the behaviour of another member of staff towards a student, they should report it at once to the Head and must refer to the School’s Safeguarding (Child Protection) Policy without delay.

RAISING A WHISTLE-BLOWING CONCERN

If a concern needs to be raised, the member of staff should speak immediately to their SLT link, or the Head, by either speaking to them in person or putting the matter in writing if they prefer. They may be able to agree a way of resolving a concern quickly and effectively.

However, if the matter concerns the Head, or the member of staff feels their attempt has not been effective, they should contact the Chair of Governors either at the school address, via email cofg@stmarysgx.co.uk or via the Bursar’s PA.

Following a notification of a concern, the Chair of Governors will arrange a meeting with the whistle-blower as soon as practicable to discuss the concern. Sufficient details will be recorded at this stage to



enable the matter to be thoroughly investigated. As a minimum the Chair of Governors will record the name of the employee but also indicate whether the individual wishes his or her identity to remain confidential, if possible, and the nature of the concern. In some cases, it will not be possible to maintain confidentiality and this will be explained to the member of staff. In such instances the member of staff will have the choice of either withdrawing or agreeing to his/her identity becoming known to enable the concern to be effectively dealt with.

Staff may bring a colleague to any meetings under this policy who must respect the confidentiality of the disclosure and any subsequent investigation.

The school will take notes and produce a written summary of the concern raised and provide the whistle-blower with a copy as soon as practicable after the meeting. The school will also aim to give the whistle-blower an indication of how it proposes to deal with the matter.

CONFIDENTIALITY

We hope that staff will feel able to voice whistle-blowing concerns openly under this policy. However, if a member of staff wants to raise his or her concern confidentially, the School will endeavour to keep his or her identity secret in so far as it is possible to do so when following this policy and procedure. If it is necessary for anyone investigating that member of staff's concern to know the whistle-blower's identity, the school will discuss this with the member of staff first.

The School does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if the school cannot obtain further information. It is also more difficult to establish whether any allegations are credible and have been made in good faith. Whistle-blowers who are concerned about possible reprisals if their identity is revealed should express this to whom they report their concern and appropriate measures can then be taken to preserve confidentiality.

Advice can be sought from Protect, the independent whistle-blowing charity: <https://protect-advice.org.uk/>

CONCERNS ABOUT MEMBERS OF THE GOVERNING BODY

If a concern surrounding a member of the Governing Body is received, then this will be treated in the same way as any other concern. The concern will be raised by the Head with the Chairman of Governors who will decide how it should be dealt with.

If the concern is against the Chairman of Governors, then clearly this process cannot be followed. In such circumstances, the concern will be taken directly to the Head who will decide in consultation with other members of the Governing Body how it should be dealt with.

EXTERNAL DISCLOSURES

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing within school. In most cases staff should not find it necessary to alert anyone externally. We strongly encourage staff to seek advice before reporting a concern to anyone external. The independent whistle-blowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.



<https://protect-advice.org.uk/contact-us/>

Whistle-blowing concerns usually relate to the conduct of school staff, but they may sometimes relate to the actions of a third party, such as a service provider. The law allows staff to raise a concern in good faith with a third party, where the member of staff reasonably believes it relates mainly to their actions or something that is legally their responsibility. However, staff are encouraged to report such concerns internally first.

NSPCC – <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/>

INVESTIGATION AND OUTCOME

Once a member of staff has raised a concern, the school will carry out an initial assessment to determine the scope of any investigation. In most cases a panel of three will investigate any issue. The school will inform the whistle-blower of the outcome of its assessment.

The school will aim to keep the member of staff informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the school from giving specific details of the investigation or any disciplinary action taken as a result. The member of staff is required to treat any information about the investigation as strictly confidential.

If the school concludes that a whistle-blower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistle-blower will be subject to disciplinary action.

There are no rights of appeal against any decisions taken under this procedure. However, an employee or the Head will have the right to refer any particular case to the Chair of Governors for review.

PROTECTION AND SUPPORT FOR WHISTLE-BLOWERS

It is understandable that whistle-blowers are sometimes worried about possible repercussions. The school will seek to encourage openness and will support staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

As described above, staff will not and cannot be treated unfairly as a result of having raised a concern under this Policy.