# CHIEVELEY PRIMARY SCHOOL

# WHISTLEBLOWING POLICY

## SEPTEMBER 2026

| Date of review | Reviewed by | Signature(s) |
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| September 2026 Newest version | FGB | |
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## 1. Purpose

1.1 The purpose of the policy is to ensure that any fraud, misconduct or wrongdoing by employees, workers, governors, volunteers or any individual performing functions in relation to the school is reported and properly dealt with.

1.2 The Public Interest Disclosure Act enables individuals to raise concerns where they have a reasonable belief that:

- A criminal offence;
- A miscarriage of justice;
- An act creating a risk to health and safety;
- A breach of other legal obligation;
- Damage to the environment;
- Sexual Harassment;
- Concealment of any of the above;

is being, has been or is likely to be committed, and it is in the public interest to disclose it, without fear of dismissal, victimisation or detriment. This policy and procedure sets out how such concerns should be raised and handled within the school.

## 2. Applicability

2.1 This policy applies to all employees and governors of the school as well as individuals performing functions in relation to the school, such as volunteers, agency workers and contractors.

2.2 The School will, therefore, respond to all individuals who raise any genuine concerns that they may have about the conduct of others in the school, **which are in the public interest**. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

2.3 The school expects the highest standards of conduct from all employees and governors and will treat seriously any concern raised about illegal or improper conduct.

2.4 Any individual covered by this policy will be expected, through agreed procedures and without fear of recrimination, to bring to the attention of the Headteacher (or the Chair of Governors if the concerns relate to the Headteacher) any serious impropriety or breach of procedure.

2.5 If an employee is concerned that his/her own contract has been, or is likely to be, broken he/she should use the school's grievance procedure.

2.6 Concern about a colleague's professional capability should **not** be dealt with using this procedure.

2.7 This procedure is not designed to replace or be used as an alternative to the grievance procedure, which should be used where an employee is only aggrieved about his/her own

situation. Nor should this policy apply where the employee simply disagrees with the way the school is run.

**3.0 Responsibilities**

3.1 The overall responsibility for this policy and procedure within the schools rests with the Head Teacher and Chair of Governors.

3.2 The governing body has overall responsibility for the maintenance and operation of this policy and procedure.

3.3 The Chair of Governors will keep a record of concerns raised and outcomes (in a form that does not endanger confidentiality).

3.4 Managers receiving concerns are responsible for reporting the concern and the outcome to the Chair of Governors so that it can be recorded.

3.5 All managers are directly responsible for making their staff aware of this policy and procedure and for the adherence of their staff.

3.6 Workers have an individual responsibility to adhere to this policy and procedure.

**4. Guidance**

4.1 It is not necessary for the employee to have proof that such an act is being, has been, or is likely to be committed,- a reasonable belief is sufficient. The requirement that a whistleblower makes a qualifying disclosure 'in good faith' has been removed.

4.2 The employee has no responsibility for investigating the matter; it is the school's responsibility to ensure that an investigation takes place.

4.3 Where the concerns are about **safeguarding children or young people**, the school's Designated Senior Lead for Child Protection should be notified.

4.4 An instruction to cover up wrongdoing is in itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority, employees should not agree to remain silent

4.5 Where a disclosure is merely an expression of opinion that fails to show that a legal obligation has been or is likely to be breached, it cannot amount to a protected or qualifying disclosure for the purposes of the whistle blowing legislation.

4.6 An employee who is not sure whether the conduct he/she is concerned about does constitute illegal or improper conduct or is unsure about how to proceed may contact their Professional Association/Trade Union.

4.7 Financial regulations require that any suspicion of fraud, corruption or other financial irregularity is reported to Internal Audit for possible investigation. Normally an employee

must first report any suspicion of such an irregularity to the Headteacher or Chair of Governors who will in turn report it to Internal Audit. Similar principles apply to Academies where the funding agency must be informed.

4.8 Employees who want to use the procedure but feel uneasy about it may wish to consult their Professional Association/Trade Union initially and bring a colleague or Professional Association/Trade Union Representative along to any discussions, so long as the third party is not involved in the issue.

4.9 Where allegations are raised anonymously they will be considered at the discretion of the Head Teacher in consultation with the Chair of Governors

4.10 Where anonymity is requested efforts will be made to meet the request where appropriate but that might not always be possible. The earlier and more open the expression of concern the easier it will be to take appropriate action.

**5. Principles**

5.1 Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the employee who raised the issue, subject to legal constraints.

5.2 No employee will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because he/she has raised a legitimate concern.

5.3 An employee who makes such a protected disclosure has the right not to be dismissed, subject to any other detriment, or victimised, because he/she has made a disclosure, provided it has not been made maliciously. Any employee who uses this procedure will not be penalised for doing so. The employer will not tolerate harassment and/or victimisation of any employee raising concerns. Victimisation of a worker for raising a qualified disclosure will be a disciplinary offence.

5.4 If misconduct is discovered as a result of any investigation under this procedure the matter will be considered under the disciplinary procedure, in addition to any appropriate external measures.

5.5 Maliciously making a false allegation is a disciplinary offence.

5.6 Where an investigation confirms the allegations workers may be required to attend hearings as witnesses.

5.7 If urgent action is required this will be taken before an investigation is conducted.

## 6.0 Raising Concerns

6.1 Anyone raising a concern under the whistle blowing policy are encouraged to raise concerns early to enable appropriate remedial action to be carried out.

6.2 Individuals should report concerns to their line manager, or where they are concerned that their manager is involved in the wrong doing, to the Headteacher, or where the Headteacher is involved in the wrong doing to the chair of governors.

6.3 If a member of staff, other than the Headteacher, is approached by a colleague/individual on a matter of concern as defined in this document, he/she is advised to take the matter to the Headteacher or the Chair of Governors.

6.4 Concerns may be raised orally or in writing. It is helpful to the investigation if the individual provides the background history of the concern (giving relevant names and dates) and the reason they are particularly concerned about the situation. The chair of governors contact details are contained below:

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|---|---|
| Email | sblundell@chieveleyschool.co.uk |
| Post | Sarah Blundell<br>Chair of Governors |

## 7.0 Procedure

7.1 The headteacher/chair of governors will hold an initial meeting with the worker as soon as possible to acknowledge the concern has been raised and clarify the details.

7.2 Where the matter can be resolved simply, for example where there has been a misunderstanding or misinterpretation of an event, the headteacher /chair of governors will explain this to the employee, check that the worker is satisfied that the matter is resolved and keep a record of the decision.

7.3 Where the headteacher/chair of governors decides the matter should be taken further The Headteacher/Chair of Governors will arrange an investigation into the matter (either by investigating the matter himself/herself or passing the issue to someone appropriate to investigate).

7.4 Once the investigation is complete the investigating officer will report to the Headteacher or where the headteacher has investigated the matter or is implicated in the matter, the chair of governors who will take the necessary action, including reporting the matter to any appropriate department or regulatory agency. If disciplinary action is required this will be

taken forward by the Headteacher/Chair of Governors/Governing body in consultation with the School's HR Advisory Team.

7.5 If the employee/individual is concerned that his/her Headteacher is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigation, he/she should inform the, Chair of Governors. Employees who feel unable to follow this route, for whatever reason, have the option of contacting one of the following, however :

- HM Revenue and Customs
- The Financial Services Authority
- The Office of Fair Trading
- The Health and Safety Executive
- The Environment Agency
- The Director of Public Prosecutions
- The Serious Fraud Office
- The Education Funding Agency
- The Department for Education
- The National College for Teaching and Leadership

## 8 Safeguarding Children and Young People

8.1 All employees have a duty to report concerns about the safety and welfare of students.

8.2 Concerns about any of the following should be reported to the Designated Senior Lead for Child Protection (DSP):

- physical abuse of a pupil/student
- sexual abuse of a pupil/student
- emotional abuse of a pupil/student
- neglect of a pupil/student
- an intimate or improper relationship between an adult and a pupil/student

Please refer to the schools safeguarding policy.

8.3 The reason for the concern may be the actions of a colleague (including a more senior colleague), a Governor, another student or someone outside the school. Whatever the reason, concerns must be reported. Failure to report a Child Protection related allegation will be in itself, a disciplinary matter.

**Appendix 1 - Guidance for workers**

## 1. What type of concerns are covered by this policy and procedure?

1.1. As a worker you may be the first to realise that there may be something seriously wrong within the school. It may be tempting to do nothing as you may feel that voicing your concerns would appear disloyal to colleagues or the school. You may also be afraid that it may lead to repercussions against yourself. However, it is important that you raise your concerns promptly so that the school can take action to rectify them.

1.2. The school is committed to ensuring that any wrong-doing is rectified as soon as possible and that workers are supported in raising any serious concerns. The whistleblowing policy and procedure explains how you should raise your concerns, and the protection you are entitled to.

1.3. You should report any serious concerns that you have about any aspect of the school, provision of education and extra-curricular activities or the conduct of employees, governors, volunteers or others acting on behalf of the school.

1.4. Concerns covered by the Public Interest Disclosure Act are listed in 1.2 above and may be something that makes you feel uncomfortable in terms of something that:

- Is against the law
- Puts someone at risk
- Breaches the school's standards, policies or procedures
- Is against the school's *instruments and articles of government*, Financial Regulations or policies and procedures
- Falls below established standards of practice
- Amounts to Sexual Harrassment
- Amounts to improper conduct

## 2. How are you protected when raising a concern?

2.1. The school will not dismiss you because you have raised a concern under this procedure, and will protect you against victimisation or other detriment, so long as you have a reasonable belief that the wrong-doing is being, has been, or is likely to be committed, and it is in the public interest to disclose it. The information that you give should be true to the best of your knowledge, information and belief.

2.2. You are not expected to investigate the concern yourself, just to be able to explain the reasons for your concern.

2.3. Any investigation into concerns of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that already affect you.

## 3. What to do if you have a concern

5.1 You should raise your concern as specified in the procedure. If you are not sure if you should raise something it may help to talk things through with your line manager, or to seek advice from your trade union or the citizens advice bureau.

This form is intended for use by any individual working for the school (including governors, contractors, agency workers and volunteers) who wishes to raise an issue about serious wrong-doing. You must have a reasonable belief in any allegations that you make, and they must be made in the public interest.

This form should be used to report wrong-doing within the school (for example, financial irregularities or health and safety concerns), rather than to raise a personal grievance. (If you want to make an allegation of bullying or harassment, or are complaining that your contract of employment has been breached, separate procedures exist for these types of concerns.)

If you are unsure about whether your complaint is best dealt with under the school's whistleblowing policy or the grievance procedure, please read the whistleblowing policy, which provides examples of the issues that should be reported using this form. If, having read the whistleblowing policy, you remain unsure about which procedure to use, please consult the *Head Teacher or the Chair of Governors (or Head of Education Services where the Head Teacher and Chair of Governors are the subjects of your allegations)* for further advice.

Once you have submitted this form, the school's whistleblowing procedure will be invoked. This will result in an investigation, which will not involve anyone (for example, your line manager) you may have implicated below.

In certain circumstances, you can request that your complaint be kept anonymous. Where possible, the school will respect a request for anonymity, but cannot guarantee that it will be able to do so.

This form should be completed and delivered to your line manager/Head Teacher or the Chair of Governors (see sections 4 and 5 of the whistleblowing procedure) in an envelope marked "confidential" or sent as an email attachment with "confidential" in the subject line.

| **Formal public interest disclosure (whistleblowing)** | |
|---|---|
| **Worker's name** | |
| **Worker's job title** | |
| **School** | |
| **Date** | |
| **Does your public interest disclosure relate to your line manager?** | Yes/No |

| **Summary of disclosure** |
|---|
| Please set out the details of the issue that you wish to raise, providing examples where possible, particularly dates, times, locations and the identities of those involved. You may attach additional sheets if required. |

| **Individuals involved** |
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| Please provide the names and contact details of any people involved in your complaint, including witnesses. |
| **Outcome requested** |
| Please set out how you would like to see the issue dealt with, and why and how you believe that this will resolve the issue. |
| **Declaration** |
| I confirm that the above statements are true to the best of my knowledge, information and belief. I understand that, if I knowingly make false allegations, this may result in the school taking disciplinary action against me. |

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| **Form completed by** | |
| **Signature** | |
| **For completion by the school** | |
| Date form received by the school | |
| Name of recipient and job role | |
| Signature | |