HARMONDSWORTH PRIMARY SCHOOL

Whistleblowing Policy (Confidential Reporting)

Approved by:	Hardip Lawana	**Date:**	Spring 2027
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This policy will be subject to ongoing review and may be amended prior to the scheduled date of the next review in order to reflect changes in legislation where appropriate.	

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1. Scope

This policy is primarily for concerns where the interests of others or of the school itself are at risk (the public interest test). If employees have a concern about their employment relationship with the school this should be raised through the school's Grievance Procedure.

This policy applies to all employees of schools and academies.

While this policy refers to “employee” throughout, its principles are intended to apply equally to:

- Contractors working for the school on school premises
- Suppliers
- Casual and agency workers
- Volunteers
- Governors
- Trustees.

All groups should have access to the same support and procedures with respect to any whistleblowing concern raised.

References to the School, Headteacher, Governing Board and the Chair of Governors will, for Academies and Academy Trusts, be taken to mean a reference to the appropriate equivalent within those establishments.

The recognised trade unions have been consulted.

2. Policy Statement

All employees at one time or another have concerns about what is happening in the workplace. Usually these concerns are easily resolved. However, there may be circumstances when the employee may not know what to do where the concern is of a more serious nature.

The school is committed to the highest possible standards of openness, probity and accountability. It expects that its employees who have serious concerns about anything that is happening within the school come forward and raise those concerns. The school, however, recognises that employees need to be supported and have confidence that any concerns they raise will be treated appropriately.

3. Policy Purpose

The purpose of this policy is to:

- Enable employees to raise concerns at an early stage and in the right way. The school would rather that matters were raised when it is just a concern rather than wait for proof.

- Encourage employees and others to feel confident in raising serious concerns by providing clear channels through which those concerns can be raised.

- Reassure those who raise concerns that they will not suffer any repercussions in doing so and that they will not be subjected to any detrimental treatment (including dismissal) as a result of raising those concerns.

The policy will ensure that all those who raise concerns receive a response and are kept informed about how their concerns are being dealt with. However, this does not necessarily mean that they will be privy to any detail in relation to the investigation into the concern raised or any specific outcomes.

4. Qualifying Disclosures

If the employee makes a disclosure of information which they reasonably believe to be true and is in the public interest and that one or more of the following is either happening, has happened or is likely to happen in the future, this will be a "qualifying disclosure" and the employee will be offered protection as a whistleblower. The disclosure must relate to the following:

- A criminal offence has been committed, is being committed or is likely to be committed
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which s/he is subject
- A miscarriage of justice has occurred, is occurring or is likely to occur
- The health or safety of any individual has been, is being or is likely to be endangered
- Acts of sexual harassment in the workplace
- The environment has been, is being or is likely to be damaged
- Information indicating any matter falling within any one of the above has been, is being or is likely to be deliberately concealed.

In schools, this can include:

- A misuse of school funds and/or financial malpractice
- Safeguarding concerns with respect to children or any action that negatively affects the welfare of children (see Appendix 1)
- Public examination fraud/SATs maladministration
- An unauthorised disclosure of confidential information
- Any conduct likely to damage the school's reputation.

The message for employees is 'If in doubt - raise it!'

5. Safeguards for those who raise a concern

Employees may be worried about raising such issues or may want to keep the concerns to themselves, perhaps feeling it is none of their business or that it is only a suspicion. They may feel that raising the matter would be disloyal to colleagues, managers or to the school. They may decide to say something but find that they have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next. They may also fear harassment or victimisation.

Support to those raising concerns

The school is committed to good practice and high standards and will be supportive of employees raising genuine concerns.

The school recognises that the decision to report a concern can be a difficult one to make. Where the employee raises a genuine concern under this policy, they should have nothing to fear as they will be considered as discharging their duty to the school.

An investigation into concerns raised under this policy will not influence or be influenced by any formal procedures (e.g. disciplinary or redundancy) that the employee may already be subject to.

Harassment or Victimisation

The school will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect the employee who raises a concern which they reasonably believe to be in the public interest.

Anonymous Allegations

The whistleblower should, whenever possible, put their name to the allegation, as concerns expressed anonymously may be less likely to result in effectively dealing with the concerns raised. Anonymous allegations will be considered at the discretion of the school and will largely depend upon whether the issue raised is sufficiently serious. In exercising their discretion, the factors likely to be taken into account by the school can include:

- Whether the concern involves safeguarding and/or child protection issues
- Whether the concern involves individual or public safety
- Whether the concern involves corruption, waste or other impropriety
- The credibility of the concern
- Whether there is a likelihood of confirming the allegation from other sources.

Confidentiality

All concerns will be treated in confidence and all reasonable efforts will be made to avoid revealing the employee's (whistleblower's) identity if requested by them.

It may not be possible to keep an employee's identity confidential whilst carrying out a thorough investigation and they may need to be identified as a witness at an appropriate time. If it becomes necessary to reveal the employee's identity, they will be informed in writing and of the reasons why it is necessary to identify them.

Untrue or Malicious Allegations

If an employee makes a disclosure which they reasonably believe to be true and in the public interest, but which is not confirmed by the investigation, no action will be taken against them. The outcome will be notified to the employee. The school will deem the matter to be concluded and that it should not be raised again unless new evidence comes to light.

If, however, an employee makes an allegation frivolously, maliciously, vexatiously or for personal gain, disciplinary procedures will apply.

6. How to raise a concern

Internally

It is normally expected that concerns will, in the first instance, be raised internally with the immediate Line Manager, Headteacher or Chair of the Governing Board. Internal processes must be considered before reporting the concern to an external prescribed person or body (see below under External Contacts).

In relation to child protection and/or safeguarding matters, concerns should initially be made with the school's Designated Safeguarding Lead or the Assistant Designated Safeguarding Lead in their absence.

Concerns may be raised verbally or in writing. If the employee wishes to make a written report it is suggested that they include the background and history of the concern with relevant dates and the reason why they are particularly concerned about the situation.

In order to engage the protection under this policy, the employee will need to demonstrate that:

- There are reasonable grounds for their concern
- They are making a disclosure which they reasonably believe to be true
- The disclosure is made in the public interest
- The disclosure relates to any one of the specified grounds as referred to above.

The employee may be accompanied by a trade union representative or a work colleague at any meeting/interview in connection with the concerns they have raised. Any companion must respect the confidentiality of the disclosure and any subsequent investigation.

7. External contacts

The primary aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases the employee should not find it necessary to alert anyone externally. However, the school recognises that in some circumstances, the employee may not feel able to disclose a matter internally or that it may be more appropriate for them to report their concerns to an external body because, for example:

- The matter is of an extremely sensitive or serious nature, or
- The employee believes management to be involved, or
- The employee believes the school will cover it up, or
- The employee believes the school will treat them unfairly if they complain, or
- Where the employee has raised the matter previously, but the concern has not been dealt with.

Employees are strongly encouraged to seek advice before reporting a concern to anyone external. Advice can be sought from their Trade Union or Citizens Advice.

The school 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, in whatever format, is not disclosed to a third party.

Where a disclosure to an external body is justified and/or necessary, in those circumstances the employee can properly report matters to the following:

- The Local Authority Director of Children's Services
- The Chief Education Officer or equivalent
- The Local Authority Designated Officer (LADO)
- The school's Diocese or equivalent (for faith schools).
- Prescribed Person or Body for example:
    - Protect (formerly Public Concern at Work), an independent charity that provides confidential advice on whistleblowing issues: 020 3117 2520 or visit their website at www.pcaw.co.uk
    - Ofsted (whistleblowing helpline): 0300 123 3155 or whistleblowing@ofsted.gov.uk
    - Education & Skills Funding Agency: 0370 267 0001 or ESFA Complaints Procedure
    - Children's Commissioner for England: 020 7783 8330 or info.request@chidlrenscommissioner.gov.uk
    - NSPCC: 020 7825 2505 or NSPCC Whistleblowing Advice Line.

As a last resort, and provided it is appropriate in all the circumstances, the employee may choose to raise their concern externally to someone other than the prescribed persons/bodies, for example:

- Union or professional association
- The Police
- A Member of Parliament (MP).

It will very rarely, if ever, be appropriate to alert the media. This also carries a risk of disclosing confidential information to unauthorised third parties. If the employee approaches the media, they can expect in most cases to lose their whistleblowing law rights and protection.

8. How the school will respond

Once the employee has raised a concern, it will be considered by the school initially to assess whether this policy is engaged or whether the concern better falls under any other policy, for example, the school's disciplinary or grievance policy.

Matters raised may also:

- Be referred to the Police
- Be referred to the Local Authority
- Form the subject matter of an independent investigation.

In deciding how to deal with the concern raised, the key considerations which the school will have in mind is the public interest, pupils and staff.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

If an investigation is required, the school will appoint an Investigating Officer. Within 10 working days of a concern being raised, the Investigating Officer will write to the employee confirming how they propose to investigate the concern and the timescale for providing a final response. If there is an ongoing investigation the person responsible for that investigation will, if

considered appropriate, provide the employee with updates on how the matter is progressing but as described elsewhere in this policy, the employee will not be privy to details of the investigation or any specific outcomes.

The school will take steps to minimise any difficulties, which the employee may experience as a result of raising a concern. For instance, if they are required to give evidence in criminal or disciplinary proceedings, the school will arrange for them to receive advice about the procedure and any support and counselling available to them.

9. The Responsible Officer

The Headteacher has overall responsibility for the maintenance and operation of this policy.

The Headteacher will maintain a register of concerns raised, the nature of the concerns and the outcomes, in a form that preserves confidentiality.

The Register will be maintained in accordance with the provisions of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

10. Publicising the Policy

The school will ensure:

- That staff receive appropriate training in respect of this policy
- That this policy is communicated to all staff and is readily accessible
- For all new staff, the policy is available upon commencement of employment with a declaration form to be signed by them - Appendix 2.

Appendix 1

Whistleblowing & Safeguarding

Safeguarding children at risk requires everyone to be committed to the highest possible standards of openness, integrity and accountability. The school is committed to encouraging and maintaining a culture where staff feel able to raise a genuine safeguarding concern and are confident that it will be taken seriously.

In the context of safeguarding, "whistleblowing" is when someone raises a concern about the well-being of a child at risk. This whistleblowing policy therefore has a key role to play in safeguarding children.

When raising a safeguarding concern, the following policies may be relevant:

- School's Safeguarding and Child Protection Policy
- School's Policy on Dealing with Allegations or Concerns Raised Against Teachers and Other Staff
- School's Code of Conduct
- Guidance for Safer Working Practice for Professionals Working in Education Settings prevailing Safer Recruitment Consortium guidance
- Keeping Children Safe in Education (KCSIE) prevailing DfE guidance
- Working Together to Safeguard Children prevailing DfE guidance
- London Safeguarding Children Procedures and Practice Guidance prevailing London Safeguarding Children Partnership guidance.

It is the clear responsibility of all to act on any concerns or information that gives them concern about the safety and wellbeing of a child or children within the school or within the care of the school or arising from circumstances or events out of school. Such a concern in a whistleblowing context may be related to:

- Conduct or behaviour of an employee towards an individual child or children that causes concern
- Information that suggests an employee is unsuitable to work with children
- A belief that the Designated Safeguarding Lead, Senior Managers or Governors have failed to take appropriate action in response to safeguarding concerns raised.

This policy outlines to whom those concerns may be reported. In dealing with concerns around safeguarding/child protection matters in particular, the London Safeguarding Children Procedures and Practice Guidance state that if a member of staff believes that a reported allegation is not being dealt with appropriately by the school, they should report the matter to their Local Authority's Multi Agency Safeguarding Hub (MASH) or Local Authority Designated Officer (LADO).

Appendix 2

Signed Declaration Form

I confirm I have received a copy of the school's Whistleblowing Policy (Confidential Reporting), and that I have read and understood the Policy and am aware of the reporting procedures contained therein.

Name of Employee: _____

Signature of Employee: _____

Date: _____