LYCEE INTERNATIONAL WINSTON CHURCHILL

(the "School")

Policy #22: Whistleblowing Policy (for staff)

Approved by:	HR Committee
On:	October 2026
Last Review	October 2026
Review Frequency	As Needed
Next Scheduled Review by SLT	March 2028
Linked Policies	Policy #6 – Policy and Procedures for Safeguarding and Child Protection Policy #17 – Gifts, Benefits, Inducements and Anti-Bribery Policy Policy #19 – Policy and Procedure for Safer Recruitment Policy #21 – Visitor Access Policy Policy #26 – Equal Opportunity and Diversity Policy (for Staff) Policy #30 – Management and Retention of Records Policy Policy #34 – Anti-Money Laundering Policy
Circulation	Governors: automatically Staff: Staff Shared Drive > Policies Parents: School Website and on request

MISSION

Through a rigorous, bilingual programme and innovative methods, we educate students to become responsible, creative, and principled global citizens. We teach them to think critically and act ethically, to form and express their own opinions and respect those of others, to define their own life goals, and to make sense of and embrace change.

Our values are Excellence, Creativity, Integrity, Awareness, and Community.

In support of these aims and values, we are committed to treating all our students with respect and dignity.

INTRODUCTION

Lycée International Winston Churchill has adopted this policy and the accompanying procedure on whistleblowing to enable Team members to raise concerns internally and in a confidential fashion, that are related to fraud, malpractice, health and safety, criminal offences, miscarriages of justice, non-compliance with legal obligations, inappropriate behaviour and unethical conduct. The policy also provides for such concerns to be raised outside the organisation if necessary.

1. SCOPE

This procedure applies to all Team Members.

For statutory whistleblowing protection, “worker” has the meaning given by applicable employment law and may include individuals beyond employees. The School will also consider concerns raised by volunteers, contractors and others under its safeguarding and reporting arrangements, even where statutory whistleblowing protection does not apply.

This procedure supports compliance with the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998) and applicable safeguarding requirements, including the Education (Independent School Standards) Regulations 2014 and current Keeping Children Safe in Education guidance.

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

- does not tolerate malpractice;
- respects the confidentiality of Team members raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- provides the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- may invoke the School’s disciplinary procedure where an allegation is knowingly false or malicious; an allegation made in good faith that is not substantiated will not, of itself, lead to disciplinary action;
- provides a clear and simple procedure for raising concerns, which is accessible to all Team members.

2. PROCEDURE

This procedure does not replace the Team Handbook for procedures such as the Special Complaints, the Grievance and Anti-Harassment and Bullying procedures and other specifically laid down statutory reporting procedures.

Personal employment grievances should normally be raised under the relevant grievance procedure unless the matter also involves a disclosure of wrongdoing reasonably believed to be in the public interest. Protected disclosures may concern past, present or likely future wrongdoing, including deliberate concealment of such wrongdoing.

3. CONFIDENTIALITY

The School recognises that raising a concern may be difficult. Workers should raise concerns where they reasonably believe that the information disclosed tends to show relevant wrongdoing and that disclosure is in the public interest. They do not need to prove their concern or investigate it themselves.

All allegations will be treated in confidence and every effort will be made not to reveal a whistleblower’s identity unless the whistleblower otherwise requests.

Where a concern involves a child at risk, staff must act without delay in accordance with the School's safeguarding and child protection policy, including reporting to the designated safeguarding lead (DSL) or deputy and making appropriate referrals to children's social care, the local authority designated officer (LADO) or police as applicable. In an emergency call 999. Confidentiality cannot be guaranteed where information must be shared to protect a child, investigate wrongdoing or comply with the law.

3.1. ANONYMOUS ALLEGATIONS

We do not encourage staff to make disclosures anonymously, although we will make every effort to investigate anonymous disclosures. You should be aware that 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 come forward 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. www.pcaw.co.uk Protect, the independent whistleblowing charity (formerly Public Concern at Work): telephone 020 3117 2520; website https://protect-advice.org.uk/.

4. REPORTING

Concerns may be raised with HR & Staff Wellbeing, the Head of School or a member of the Senior Leadership Team, provided that person is not implicated. Where the concern involves any of these individuals, or the whistleblower is uncomfortable using those routes, it may be raised directly with the Chair of Governors at chairofgovernors@lyceeinternational.london. Safeguarding concerns must also be reported promptly through the School's safeguarding procedures; the whistleblowing route must not delay urgent action.

- The Head of School
- A member of the Senior Leadership Team

The recipient will promptly acknowledge the concern where contact details are available, assess immediate safeguarding or other risks, determine an appropriate and impartial investigator, and avoid referring the matter to anyone implicated. Where allegations concern adults working with children, the School will follow the applicable allegations and low-level concerns procedures and consult the LADO where required.

Whether a written or oral report is made it is important that relevant information is provided including:

- The name and contact details of the person reporting, if they choose to provide them (anonymous reports will also be considered).
- The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation).
- The specific reason for the allegation. Although someone making an allegation will not be expected to prove the truth of any allegations, they

will need to provide information to the person they have reported to, to establish that there are reasonable grounds for the allegation.

The Whistleblower may be accompanied by another person of their choosing during any meetings or interviews in connection with the allegation. However, if the matter is subsequently dealt with through another procedure the right to be accompanied will at that stage be in accordance with the relevant procedure.

5. INVESTIGATION

Concerns will be assessed promptly and investigated proportionately, fairly and by an appropriate person who is not implicated. The School will keep a secure, restricted-access record of the concern, decisions, referrals, action taken and outcome, in accordance with its records retention and data protection policies. Safeguarding referrals and statutory notifications will not be delayed pending an internal investigation.

The Team member making the allegation will be kept informed of progress and, whenever possible (and subject to third-party rights) will be informed of the Resolution. Where the allegation has been made internally and anonymously, obviously the School will be unable to communicate to the whistleblower what action has been taken.

A Team member who is dissatisfied that their concern is being properly dealt with will have a right to raise it in confidence with <chairofgovernors@lyceeinternational.london>.

6. EXTERNAL PROCEDURES

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
Workers do not have to exhaust internal procedures before making a qualifying disclosure to an appropriate prescribed person. Depending on the subject, this may include the Secretary of State for Education (for independent schools), Ofsted, the Health and Safety Executive, HMRC or another regulator within its statutory remit. For concerns about safeguarding practice, staff who cannot raise a concern internally or whose concern is not being addressed may contact the NSPCC Whistleblowing Advice Line on 0800 028 0285. Child protection concerns should be referred promptly to children's social care or police as appropriate. ISI is the School's inspectorate, but staff should check the appropriate statutory reporting route for their concern.

It will very rarely, if ever, be appropriate for you to alert the media
In certain circumstances, a Team member may be legally protected when raising a concern outside the School, including where:

- they reasonably believe they would suffer a detriment if they raised the concern with the School or a prescribed person;
- they reasonably believe that relevant evidence would be concealed or destroyed if they raised the concern with the School or a prescribed person;

- they have previously disclosed substantially the same information to the School or a prescribed person; or
- the failure is of an exceptionally serious nature.

Legal protection for external disclosures depends on the conditions in the Employment Rights Act 1996, including the nature of the concern, the worker's reasonable belief, public interest and the recipient. Additional conditions apply to wider disclosures, such as to the media. Staff may obtain independent advice from Protect or a legal adviser; seeking advice must not delay urgent safeguarding action.

Relevant references: Keeping Children Safe in Education 2026 (Part One and Part Four); Education (Independent School Standards) Regulations 2014, paragraph 7; ISI inspection framework (September 2026); and the current GOV.UK list of prescribed persons. Staff should consult the latest versions when making a referral.

We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect (see above), operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

7. MALICIOUS ACCUSATIONS

Knowingly false or malicious allegations may be addressed under the School's disciplinary procedure. No disciplinary action will be taken merely because a concern raised with a reasonable belief was mistaken or could not be substantiated.

8. PROTECTION FROM REPRISAL OR VICTIMISATION

The School will not tolerate dismissal, victimisation, harassment or any other detriment because a worker has made a protected disclosure. Protection under whistleblowing law does not depend on acting in good faith, although bad faith may be relevant to compensation. Any suspected retaliation should be reported to the Chair of Governors or another uninvolved senior leader and will be investigated. The School will take appropriate steps to protect whistleblowers and preserve confidentiality as far as lawful and practicable.