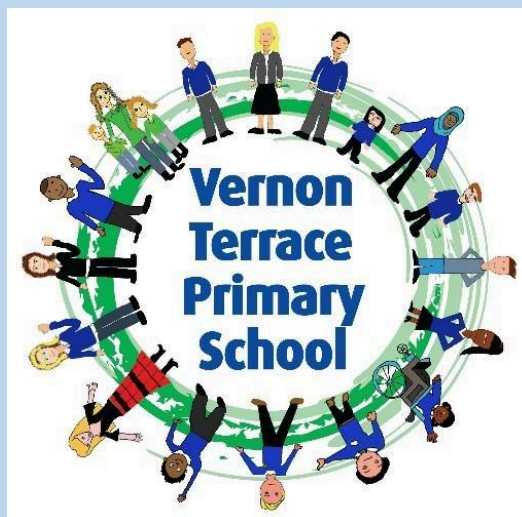


Vernon Terrace Primary School

Staff Whistle Blowing Policy



Aims/objectives

The Governing Body, alongside the Headteacher, is committed to maintaining the highest standards of openness, integrity, and accountability. In line with this commitment, the school actively encourages all staff to raise serious concerns about any aspect of the school's work, including the actions or conduct of colleagues, governors, or external organisations associated with the school.

This Whistleblowing Policy provides a clear and confidential framework through which staff can raise concerns that fall outside the scope of other procedures (e.g. grievance or disciplinary). It ensures that such concerns are handled fairly, sensitively, and appropriately, and that staff are supported in doing the right thing.

The policy specifically aims to:

- Provide a clear and secure process for raising serious concerns internally, and where necessary, outside of the school's leadership structure
- Ensure that concerns are taken seriously, investigated fairly, and responded to appropriately
- Offer staff reassurance that they will be protected from reprisal, victimisation, or disadvantage when raising concerns in good faith
- Provide feedback to staff on the outcome of any concerns raised, where appropriate and lawful
- Allow staff to escalate the matter further if they are dissatisfied with the school's response

This policy applies to all school staff, including teaching and support staff, contractors, volunteers, and governors, and aligns with the principles of the Public Interest Disclosure Act 1998 (PIDA). It complements other school policies such as Safeguarding, Staff Code of Conduct, and Complaints Procedures.

Qualifying Disclosures and Scope of Concerns

This policy is intended to cover serious concerns that fall outside the scope of individual grievances, which are typically addressed through the school's grievance procedures. It applies to all employees, workers, volunteers, governors, and contractors.

Under this policy, staff are encouraged to report "qualifying disclosures" — concerns about wrongdoing that they reasonably believe to be in the public interest, and where they have reasonable grounds and/or evidence to support the disclosure.

Such concerns may relate to actions or behaviours that:

- Constitute a criminal offence
- Breach a legal obligation, statute, or regulatory requirement
- Result in a miscarriage of justice
- Pose a serious danger to the health or safety of an individual or group
- Represent racial, sexual, disability-based or other forms of discrimination
- Demonstrate a failure to protect the welfare of pupils, staff, or the public
- Involve unauthorised use of public funds or school assets
- Suggest fraud, bribery, or corruption
- Indicate serious or persistent breaches of school policy, including the staff Code of Conduct or disciplinary policy
- Constitute improper, indecent, or unethical conduct
- Involve abuse of power or position, including by senior leaders
- Seek to cover up or conceal any of the above matters

Concerns that may appear minor on their own but form part of a wider pattern of behaviour or culture may also be raised under this policy.

If you are unsure whether a concern falls within this scope, you are encouraged to raise it and seek guidance in confidence. The school is committed to listening without judgement and investigating where appropriate.

Procedure

All whistleblowing concerns must be reported directly to the Headteacher to maintain confidentiality and ensure the matter is dealt with at the appropriate level. Staff should not discuss concerns informally with colleagues or report them to anyone other than the Headteacher.

Submitting a concern

The school encourages staff to raise any concerns as early as possible, as this enables prompt investigation and action.

In most cases, concerns should be raised, in writing using incident form, directly to the Headteacher who is responsible for determining whether the issue meets the threshold for investigation under this Whistleblowing Policy. This approach allows the Headteacher the opportunity to address the issue internally and provide an explanation for the behaviour or activity in question.

The appropriate course of action may depend on:

- The nature and seriousness of the concern
- The sensitivity of the issue
- The person(s) involved

If the concern relates to the Headteacher, it should be raised with the Chair of Governors. Email the Chair of Governors to arrange a meeting to discuss a whistleblowing concern against the Headteacher. Do not record the concern in the email. You can submit your concern in writing directly to the chair of governors when you meet them.

For allegations of fraud, financial misconduct, or malpractice, concerns can be raised directly with the Local Authority's Head of Internal Audit.

Important (GDPR note): Do not report via email as emails are not secure.

Staff may also choose to:

- Seek advice from a Trade Union or Professional Association, or
- Ask their union to raise the concern on their behalf

Procedure steps and points to consider

Step	Action
Reporting the Concern	Concerns should be raised in writing or in person to the Headteacher, and should include: • A clear description of the concern • Any relevant background, dates, or evidence • Whether you have already reported the concern and the outcome, if any

	If the concern relates to the Headteacher, it should be reported to the Chair of Governors at: mhenderson@vernonterrace.net
Initial Assessment	Upon receiving a concern, the Headteacher will make an initial assessment to determine whether it: • Meets the threshold for investigation under the Whistleblowing Policy, or • Is more appropriately handled under the Low-Level Concerns Policy or another relevant internal policy (e.g. disciplinary, grievance, safeguarding) In some cases, the Headteacher may delegate the handling of lower-level concerns to another senior staff member, but only after the concern has been formally assessed and with a clear rationale.
Confidentiality and Data Protection	Due to the sensitive nature of whistleblowing, and in compliance with the UK GDPR and Data Protection Act 2018, the Headteacher will treat all concerns in strict confidence. While you will be informed that your concern has been received and considered, you may not be entitled to know the specific outcome or any disciplinary action taken as this could involve confidential information about other individuals.
Record-Keeping and Monitoring	A confidential record of the concern, any action taken, and the decision-making process will be securely documented and retained in line with the school's data retention policy. The school business manager and Deputy Headteacher may have access to the data due to their HR responsibilities.
Protection for the Whistleblower	Staff who raise concerns in good faith will be protected from reprisal, harassment, or victimisation, even if the concern is not upheld following investigation. Raising a concern maliciously or knowingly making a false allegation, however, may be subject to disciplinary action.

Staff who raise concerns under this policy are protected, provided that the disclosure is made in good faith, relates to a genuine concern, and the staff member has a reasonable belief that the concern is true—even if the belief turns out to be mistaken.

The concern must relate to one or more of the qualifying matters listed in this policy (e.g. criminal offence, legal breach, safeguarding failure). While concrete proof is not required, the individual must be able to demonstrate the basis of their concern with reasonable evidence or context that led them to speak up.

Respecting Confidentiality and Anonymity

The school understands that raising concerns can be difficult and potentially distressing. Therefore:

- All concerns raised will be handled sensitively and confidentially.
- The identity of the whistle-blower will be kept confidential wherever possible. This confidentiality will only be breached where required by law (e.g. during formal investigation or legal proceedings), and the individual will be informed if this becomes necessary.
- Anonymous disclosures will be considered, although it may be more difficult to investigate.

Protection from Reprisals

The Governing Body and school leadership are committed to ensuring that any individual who raises a concern in good faith is:

- Protected from victimisation, harassment, or retaliation, and
- Not subjected to any detrimental treatment as a result of whistleblowing.

Any attempt to penalise, threaten, or discourage staff from raising concerns will not be tolerated and may lead to disciplinary action against the perpetrator.

If the concern relates to the Headteacher, staff should report directly to the Chair of Governors. Staff can also seek advice externally from recognised whistleblowing support organisations if they feel unable to raise the concern internally.

Confidentiality

The School encourages staff to raise concerns openly and in their own name. Named disclosures allow for better communication, enable more effective investigations, and ensure that staff can be kept informed throughout the process.

However, the school recognises that some individuals may feel unable to come forward without anonymity. Therefore, anonymous concerns will still be considered, at the discretion of the Headteacher/chair of governors.

In deciding whether to investigate an anonymous disclosure, the following factors will be taken into account:

- The seriousness and potential impact of the concern

- The credibility and specificity of the information provided
- The likelihood that the concern can be confirmed from alternative or independent sources
- The ability to trace and prevent misuse, including malicious or false reporting

The School will make every reasonable effort to protect the identity of staff members who request confidentiality. However, it must be understood that, in some cases, the nature of the investigation or the statements required to progress the matter may inadvertently reveal the source of the concern. In such instances, the individual will be informed in advance where possible.

Any deliberate breach of confidentiality, or attempt to identify a whistle-blower without their consent, may be treated as a disciplinary matter.

How will the School/Local Authority respond?

The action taken by the School will depend on the nature and seriousness of the concern raised. Matters may be:

- Investigated internally under the school's own policies
- Referred to the police or another external authority
- Referred to the Local Authority' Designated Officer
- Considered under alternative, more appropriate policies (e.g. low-level safeguarding, disciplinary, grievance)
- Resolved through informal or agreed actions without further formal investigation

Initial Response

In order to protect all individuals involved, the School will first conduct a preliminary assessment. This will determine whether the concern has a reasonable foundation and how it should be handled.

Third parties (such as legal or HR advisors, safeguarding officers, the Local Authority, the Department for Education, or the police) may be involved at any stage of the investigation where necessary.

Investigation

Records will be maintained throughout the process, documenting actions taken, findings, and decisions made. The individual/s leading the investigation, in conjunction with school leadership or the governing body, as appropriate will determine the most suitable way to report findings and recommend any corrective action, which may include:

- Disciplinary proceedings
- Referral to a regulatory body
- Organisational change or training
- No further action (if concern is not substantiated)

Within 14 working days of the concern being received, the Headteacher or Chair of Governors will respond in writing to the person who raised the concern, confirming:

- That the concern has been received and acknowledged
- State that the matter is being taken seriously and an investigation is being undertaken. It will state whether a formal investigation will take place, and if not, the reason why. It may state that matter is being addressed via another policy

The level of ongoing contact with the staff member who raised the concern will depend on the complexity of the issue, the clarity of the original disclosure, and whether further information is required. Staff may be invited to attend further meetings and will have the right to be accompanied by a trade union representative, professional association representative, or a work colleague not directly involved in the concern.

Feedback and Outcome

The school understands that staff need assurance their concern has been taken seriously. While specific outcomes may not be shared (due to confidentiality, data protection, or legal reasons), staff will be given confirmation that the matter has been investigated and resolved appropriately, where possible.

If the concern is substantiated, or of significant importance, a summary of the findings may be shared with the governing body and/or the Local Authority, ensuring no breach of confidentiality occurs in the process.

What happens if I am dissatisfied with the action taken (or the lack of)

This policy is designed to provide staff with a clear and secure avenue for raising serious concerns within the school. However, if you feel that your concern has not been dealt with appropriately or you are dissatisfied with the outcome, there are further steps you can take.

Internal Escalation

- **Step 1:** You should first raise your dissatisfaction with the investigating officer, who will respond to your concerns and explain the outcome and rationale of the investigation.
- **Step 2:** If the concern remains unresolved, and the investigating officer was **not the Headteacher**, you should request a meeting with the **Headteacher** to discuss the matter further.
- **Step 3:** If the Headteacher was the investigating officer and you remain dissatisfied, you may escalate the matter to the **Chair of Governors**.

External Disclosure

If, after exhausting all reasonable internal routes, you still believe your concern has not been properly handled, you have the right to take the matter outside the school or Local Authority. The Secretary of State for Business and Trade has prescribed a list of external bodies that can lawfully receive whistleblowing disclosures, including (but not limited to):

Ofsted (for matters relating to the welfare of pupils in schools) – you can do this via phone or their website

You must ensure that any disclosure made to the above prescribed body is made in good faith, and you must reasonably believe that:

- The information you are disclosing is substantially true, and
- You are raising the concern in the public interest (not for personal gain)

You must also take care not to disclose confidential information that is unrelated to your concern or breaches data protection laws. Avoid using staff/pupil names when sharing your appeal.

Raising unfounded and malicious concerns

The school encourages all staff to raise genuine concerns in good faith. If an allegation is made sincerely and with reasonable belief—even if it is not substantiated following investigation no action will be taken against the individual raising the concern.

However, if a concern is found to have been raised maliciously, vexatiously, or for personal gain, this will be treated as a serious matter and may result in formal disciplinary action in accordance with the school's disciplinary procedures.

Staff should be aware that making knowingly false allegations could also lead to legal consequences. A whistle-blower who deliberately makes false or defamatory statements about another person may be exposed to claims of libel (written defamation) or slander (spoken defamation). These are civil wrongs that could result in legal action for damages, particularly where a false statement harms an individual's reputation.

That said, whistle-blowers are generally protected from such liability where the disclosure is made:

- In good faith,
- With a reasonable belief that the information disclosed is true and in the public interest, and
- To someone who has a legitimate duty or interest in receiving the information (such as a Headteacher, Chair of Governors, or a prescribed external body).

Staff are therefore encouraged to consider the seriousness of their concerns, the supporting evidence, and the appropriate route for disclosure. Support and advice are available through professional associations, trade unions, or independent advisory services.

Responsible Officer

The Chair of Governors has overall responsibility for the maintenance and operation of this policy. That person maintains a record of concerns raised and the outcomes and will report as necessary to the Governing Body.

Signed **M Henderson**

Date: **6th September 2025**

Chair of Governors