High Rocks Federation

ASPIRATION INCLUSION COLLABORATION

BROADWATER DOWN PRIMARY SCHOOL

LANGTON GREEN PRIMARY SCHOOL

Whistleblowing

This is a shared policy, applied to all schools within the Federation and superseding any previous separate policies.

Approved	Autumn 2025
Next review	Autumn 2026

Table of Contents

1. Introduction 3
2. Other complaints procedures 3
3. Aims 3
4. Confidentiality 4
5. Anonymous Allegations 4
6. Untrue Allegations 4
7. Raising a Concern 5
8. Contact 6
9. Support 6
10. Taking Matters Further 6
11. Public Interest Disclosure 7

1. Introduction

At High Rocks Federation, we are committed to the highest possible standards of openness, probity and accountability and we encourage staff employees, and others working with us, to raise any concerns about any aspect of our work to come forward and voice those concerns. In some instances, concerns may need to be expressed on a confidential basis. All staff are made aware of our whistleblowing procedure and understand that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. All staff know where they can access the policy (all toilets) and contact numbers are visible throughout the school.

This procedure encourages staff to raise serious concerns without fear of reprisal or victimisation, internally within High Rocks Federation and/or Kent County Council rather than overlooking a problem or raising the matter outside.

It applies to all staff, agency workers and those contractors working on our premises, for example, cleaners, builders, drivers, plumbers etc. It also covers suppliers and those providing services under a contract with us in their own premises.

2. Other complaints procedures

This procedure is separate from our ***complaints procedures*** and other statutory reporting procedures applying to some policies. School leaders are responsible for making staff aware of these procedures. Any investigation into allegations of potential malpractice under this procedure will not influence or be influenced by any disciplinary or redundancy procedures that already affects an individual.

3. Aims

This procedure aims to ensure individuals are:

- encouraged to feel confident in raising serious concerns and to question and act upon concerns about practice
- provided with avenues to raise concerns and receive feedback on any action taken
- given a response to their concerns and are aware of how to pursue them if not satisfied
- reassured that they will be protected from reprisals or victimisation if they have a reasonable belief any disclosure has been made in good faith.

There are existing procedures in place to enable individuals to lodge a grievance relating to their own employment including issues relating to harassment and bullying. This procedure is intended to cover concerns that fall outside the scope of other procedures. These include:

- conduct which is, has been or is likely to be an offence or breach of law
- conduct that has occurred is occurring or is likely to occur, the result of which we fail to comply with a legal obligation. For example, unauthorised use of public funds, possible fraud and corruption, sexual or physical abuse of pupils and/or staff, or other unethical conduct discrimination of any kind and waste/frivolous expenditure.
- disclosures related to past, current or likely miscarriages of justice
- past, current or likely health and safety risks, including risks to the public as well as other staff (see below)
- past, current or likely damage to the environment
- concerns about any aspect of teaching or the conduct of staff or others acting on behalf of the school, can be reported under the confidential disclosure procedure. This may be about something that you:
- feel uncomfortable about in terms of known standards, your experience or the standards you believe we subscribe to: or
- are against our polices; or
- falls below established standards of practice; or
- amounts to improper conduct.

4. Confidentiality

All concerns raised will be treated in confidence and every effort will be made not to reveal your identity if this is your wish. However, in certain cases, it may not be possible to maintain confidentiality if you are required to come forward as a witness.

5. Anonymous Allegations

Whenever possible you should put your name to your allegation as concerns expressed anonymously are much less powerful than those that are attributed to a named individual. However, anonymous allegations will be considered and investigated at our discretion.

In exercising the discretion, the factors to be taken into account would include:

- the seriousness of the issues raised
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

6. Untrue Allegations

If you make an allegation in good faith that is not subsequently confirmed by an investigation, no action will be taken. Disciplinary action will only be taken against individuals who knowingly make false, malicious or vexatious allegations.

7. Raising a Concern

General

Concerns can be raised verbally or in writing. A concern raised in writing should:

- set out the background and history of the concern, giving names, dates and places where possible.
- The reason why you are particularly concerned about the situation.

The earlier a concern is raised the easier it is to take action. Although you are not expected to prove beyond doubt the truth of an allegation, you need to demonstrate to the person contacted that there are sufficient grounds for your concern.

A trade union or professional association may raise a matter on behalf of a member of staff.

Step One – Raising a Concern

Whenever possible you should raise your concern with the Executive Headteacher or Chair of Governors, or your immediate line manager. If this is not appropriate, you should approach the following according to the nature of the concern:

NSPCC: 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday)

Independent Helpline Public Concern at Work-020 7040 6609

We have an anti-fraud and corruption policy statement and all suspected financial irregularities must be reported to the Executive Headteacher and/or Chair of Governors.

Step Two – How we will respond

The action we take will depend on the nature of the concern. The matters raised may:

- be investigated internally by management, led by the Headteacher and the Chair of Resources and/or Chair of Governors, or through the disciplinary or other internal process
- be referred to the police
- be referred to Schools Financial Services (SFS)
- form the subject of an independent inquiry.

In order to protect individuals and the school, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures (e.g., child protection or discrimination issues) will normally be referred for consideration under those procedures.

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.

Within 10 working days, the responsible person will write to you:

- acknowledging that the concern has been received
- indicating how we propose to deal with the matter
- giving an estimate of how long it will take to provide a final response
- informing you if any initial enquiries have been make
- whether further investigations will take place and, if not, why not

8. Contact

The amount of contact between those considering the issues and you will depend on the nature of the matters raised, the potential difficulties involve and the clarity of the information provided. If necessary, further information will be sought.

Attending Meetings

When any meeting is arranged you have the right to be accompanied by a trade union representative or a workplace colleague who is not involved in the area of work to which the concern relates.

9. Support

We will take steps to minimise any difficulties you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, we will advise or arrange for you to have advice about the procedure.

We will not tolerate harassment or victimisation (including informal pressures) and will take action to protect individuals who raise a concern in good faith.

We accept that you need to be assured that concerns will be properly addressed and, subject to legal constraints, will provide information about the outcomes of any investigations.

10. Taking Matters Further

This procedure is intended to provide individuals with an avenue to raise concerns within the school. If you are not satisfied, and feel it is right to take the matter further, the following are possible contact points:

- Public Concerns at Work 020 7404 6609
- a local Kent County Council member
- NSPCC whistleblowing helpline Staff can call: 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email: help@nspcc.org.uk
- relevant professional bodies or regulatory organisations
- a solicitor
- the police



If a matter is taken outside the school, you must take all reasonable steps to ensure that confidential or privileged information is not disclosed. If in doubt, please contact Schools Financial Services.

11. Public Interest Disclosure

Public Interest Disclosure Act 1998 gives staff two safeguards in respect of disclosures of information.

- A member of staff is entitled not be subjected to any detriment by virtue of having made a protected disclosure.

- The dismissal of any member of staff directly due to the individual having made such a disclosure will automatically be unfair.

Anti-Fraud and Corruption Statement:

High Rocks Federation aims to be an honest and ethical institution. As such, it is opposed to fraud and seeks to eliminate fraud by the way it conducts school business. All suspected financial irregularities must be reported to the Chair of Governors. In order to minimise the risk and impact of fraud, the school's objectives are, firstly, to create a culture which deters fraudulent activity, encourages its prevention and promotes its detection and reporting and, secondly, to identify and document its response to cases of fraud and corrupt practices.

High Rocks Federation ensures that integrity, consistency, impartiality, fairness and best practice, is provided for both staff and management with mutually understood guidelines for the administration of this procedure. The scope of this procedure extends to all school employees, permanent, voluntary and fixed term.