St Paul's CE Primary School

Whistleblowing

Policy

Agreed by Governing Body on:	**04/02/2026**
Policy review date:	**February 2027**

Model Policy for B&H Schools

Whistleblowing Policy - (Raising Concerns in the Public Interest)

A Confidential Reporting Policy for All Members of Staff and the General Public

1. Introduction

1.1 St Paul's CE School is committed to the highest standards of openness, honesty, integrity and accountability for the services it provides. However, we recognise that there is always the risk that things can go wrong. Therefore, the School is keen to encourage those working for it and members of the community to express their concerns when they think that there may be something seriously wrong regarding its activities. This gives us the opportunity to stop any unethical or unprofessional practices or wrongdoing within the organisation.

1.2 The School recognises that for individuals to come forward, they must have confidence that their concerns will be listened to and that we will take prompt action to investigate and deal with concerns appropriately.

1.3 This policy sets out how concerns about serious wrongdoing by the School can be raised and how we will respond to these.

1.4 This Policy incorporates the provisions that are required from the Public Interest Disclosure Act 1998 (as amended by the Enterprise & Regulatory Reform Act 2013), which protects members of staff against detrimental treatment or dismissal for disclosing normally confidential information because they reasonably believe it is in the public interest to do so. This is known as a "qualifying disclosure".

2 Benefits of this policy

2.1 This Policy aims to:

- encourage and enable you to feel confident in raising concerns and to question and act upon any concerns;
- provide avenues for you to raise concerns;
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied with the action taken;
- reassure members of staff that they will be protected from repercussions when raising genuine concerns;
- ensure that all those working for, or on behalf of, the School are aware that they must not treat individual(s) detrimentally because they have made a "qualifying disclosure" under the Act.

3 Scope

3.1 The types of concern covered by the policy include:

- conduct which is an offence or a breach of law, including discrimination or harassment based on or related to a protected characteristic (either yours or someone else's)
- disclosures relating to miscarriages of justice
- individual(s) covering up wrongdoing
- health and safety risks, including risks to the public as well as other employees
- damage to the environment
- the unauthorised use of School funds
- possible fraud, corruption or financial irregularity
- practice which falls below established standards or practice
- sexual or physical abuse
- other unethical conduct

3.2 This policy and its associated procedures is not intended to replace any existing School procedures that would be more appropriate for dealing with any concern raised under this policy:

Members of staff

If your concern relates to how you have been personally treated at work as an employee under your contract of employment, you should raise it under the Grievance Procedure. If your concern relates to bullying or harassment, the School will respond under the Anti-Bullying, Harassment and Victimisation Policy and Procedure.

The whistleblowing process provides a means of raising concerns about wrongdoing which affects others (including but not limited to other employees, service users and/or the wider public) in addition to, or instead of, the whistleblower themselves.

Members of the Public

If you have a concern or complaint about services provided to your family by the School, you should raise this using the School Complaints Procedure or, if about broader educational services, the Council's Complaints Procedure.

4 Who can raise a concern under this policy?

4.1 This policy applies to all:

- employees
- casual, agency workers and apprentices working for the School
- contractors and employees of contractors working for the School
- self-employed consultants working for the School
- members of the public (including parents/guardians)
- governors and volunteers

5 Supporting you to raise a concern

5.1 Confidentiality:

We hope that you will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concerns confidentially, we will make every effort to keep your identity secret. If the situation arises where we are not able to resolve the concern without revealing your identity (for instance because your evidence is needed in court), we will discuss with you whether and how we can proceed.

5.2 **Staff Raising Genuine Concerns:**

The School aims to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Staff who raise genuine concerns under this policy with a reasonable belief that it is true must not suffer any detrimental treatment as a result of raising the concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Staff and those working for the School must not threaten or retaliate against a person who raises a concern under this policy. If you believe that you have suffered any such treatment, you should inform the headteacher immediately. If the matter is not remedied, you should raise it formally using the Grievance Procedure.

5.3 **Staff Raising Malicious Allegations:**

You may be subject to disciplinary action if you raise a concern maliciously or the information you have used to trigger a concern has been obtained unlawfully, for example:

- legal requirements have not been followed, e.g. the Data Protection Act has been breached or
- through unauthorised access to records, e.g. computer hacking.

6 How to raise a concern

Points of contact

6.1 As soon as you become reasonably concerned, we hope you will feel able to raise it. The earlier you raise your concern, the easier it is to take action. A flowchart showing the process for raising concerns can be found at Appendix 2.

6.2 <u>Members of Staff</u>

If you are an employee you should normally raise concerns with your line manager. Similarly, non-employees (e.g. agency workers, contractors, consultants) should raise a concern in the first instance with their contact within the School, usually the person to whom they directly report.

If you are a member of staff and you want to raise the matter with someone other than your immediate manager, for whatever reason, please raise the matter with:

Michelle Lord (Headteacher) or
Andrew Collin (Chair of Governors)

These people will also be able to advise on confidentiality and further action required.

6.3 Members of the Public

If you are a member of the public you can raise concerns with:

Michelle Lord (Headteacher) or
Andrew Collin (Chair of Governors)

Or if you are unable to raise these issues with the above (due to concerns on involvement) then see section 8.

The Procedure

6.4 You may raise your concern orally or in writing. We advise that you make it clear that you are raising your concerns under the School's whistleblowing arrangements.

6.5 You are also encouraged to put your name to any concern you raise as this will make it easier for the School to investigate the issue. Please also say if you want to raise the matter in confidence so that the person you contact can make appropriate arrangements.

6.6 To enable your concern to be dealt with properly and effectively you will need to provide the following information and to be as clear as possible about:

- what the concern is and to whom it relates
- the background and history of the concern (giving relevant dates)
- the reason why you are particularly concerned about the situation and why you believe it to be true.

6.7 When raising a concern you are not expected to prove the truth of an allegation, however, you will need to demonstrate to the person you contact that there are sufficient grounds for the concern.

6.8 If you are a member of staff you may invite your trade union representative or a colleague who works for the School to assist or accompany you. Similarly, if you are a member of the public you may be supported by a colleague or friend. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

6.9 If you want to submit your whistleblowing complaint in writing, you can use whatever form you prefer, including e-mails or submitting hard documents. While it doesn't have to be in any particular form, you can use the suggested form (attached as appendix 3) if you prefer.

7 How the School will respond

7.1 Once a concern is raised, the School will respond to your concern as quickly as possible. The appropriate person will make initial enquiries, taking advice from Human Resources if necessary, to help decide if an investigation is appropriate and if so, what form it should take.

7.2 The person receiving the concern will ensure the Headteacher or Chair of Governors (as appropriate) is provided with sufficient details to be aware of the concern raised.

7.3 Where appropriate, the matters raised may:

- be investigated by management, internal audit or through the disciplinary process;
- be referred to the Police;
- be referred to the external auditor or
- form the subject of an independent inquiry

Within 10 working days of a concern being raised, the person handling the matter will write to you acknowledging that the concern has been received, indicating how, as far as possible, it will be dealt with and, if you are a member of staff, the support mechanisms available to you. You will be kept informed of progress and will receive a full and final response, subject to any legal constraints.

7.4 When you raise the concern(s) you may be asked how you think the matter might best be resolved. If you have any personal interest in the matter, we ask that you tell us this at the outset. If your concerns would be more appropriately dealt with under another School policy (for example, the Complaints Procedure or Grievance Procedure) we will tell you.

7.5 While the purpose of this policy is to enable us to investigate possible malpractice and take appropriate steps to deal with it, we will give you as much feedback as we properly can.

7.6 Concerns or allegations that fall within the scope of specific procedures (for example child protection) will normally be referred for consideration under the relevant procedure. Some concerns may be resolved by agreeing action with you without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

7.7 The School will take all reasonable steps to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are asked to give evidence in criminal or disciplinary proceedings, the School will arrange for you to receive appropriate advice and support.

8 How your concern can be taken further

8.1 This policy is intended to provide you with an avenue to raise concerns with the School. The School hopes that you will be satisfied with the way your concerns are treated and any investigations that may be carried out.

However, if you are not, and feel it is right to take the matter outside the School, please find below a list of possible contact points. If you are a member of staff, Human Resources can provide advice as to the other options or you may also contact your trade union.

- The following are examples of some of the possible contact points at Brighton & Hove City Council: Alison McManamon, Director of People and Innovation - 01273 290511
- Carolyn Sheehan, Audit Manager - Internal Audit and Counter Fraud - 07795 335692
- Nigel Manvell, Chief Finance Officer – 01273 291319

These people will also be able to advise on confidentiality and further action required.

Alternatively, you may use our dedicated whistleblowing reporting inbox: whistleblowing@brighton-hove.gov.uk.

If these channels have been followed but you still have concerns or if you feel that the matter is so serious that you cannot discuss it with any of the above, you may as a last resort contact:

- Jess Gibbons, Chief Executive – tel. 01273 291132

N.B. Please note that the Council may pass the matter back to the school to deal with, if after initial assessment, it is judged appropriate to do so.

You may also contact:

- relevant professional bodies or regulatory organisations. A list of regulatory bodies can be found in Appendix 1.
- a solicitor
- the Police

8.2 If you are a member of staff, the law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. If you would like independent advice at any stage, you can contact the independent charity Public Concern at Work www.whistleblowing.org.uk on 020 7404 6609. They should be able to give you free and confidential advice about how to raise a concern about serious malpractice at work.

9 Recording, monitoring and reviewing

9.1 Michelle Lord (Headteacher) has overall responsibility for the maintenance and operation of this policy and for ensuring it is reviewed annually by involving key stakeholders in the process.

9.2 A register of all concerns and the outcomes that are brought to the attention of the headteacher (in a form which respects your confidentiality) will be maintained by the headteacher. All officers designated to look into a concern

must ensure that the headteacher is provided with sufficient details for the register.

9.3 The headteacher will review the register and will report annually to the Governing Body on the use of the policy and concerns raised during the period covered by the report. The report will not identify any person raising concerns under this policy.

10 If you are dissatisfied

10.1 If you are unhappy with our response, remember you can go to the other levels and bodies detailed in this policy.

10.2 While we cannot guarantee that we will respond to all matters in the way that you might wish, we will try to handle the matter fairly and properly.

11. Related Information

Counter Fraud Strategy & Framework

Fraud reports can be made to the antifraud and corruption hotline on 01273 291847 or by emailing antifraud@brighton-hove.gov.uk

Employees see more information on the Intranet pages http://wave4schools.brighton-hove.gov.uk/ourcouncil/corporategovernance/fraud/Pages/default.aspx

For members of the public more information is available on the council website pages https://www.brighton-hove.gov.uk/content/council-and-democracy/anti-fraud-and-corruption

Appendix 1

Regulatory and Professional and other External Organisations

Health & Safety and Environment Risks

Contact	Details
Environment Agency	**Address:** Solent and South Downs Area Office, Guildbourne House, Chatsworth Road, Worthing, Sussex, BN11 1LD (South East regional office) **Tel:** 0370 8506506 **Web:** www.environment-agency.gov.uk
Health & Safety Executive	**Address:** Priestley House, Priestley Road, Basingstoke, Hampshire RG24 9NW (regional office) **Tel:** 0845 345 0055 **Web:** www.hse.gov.uk
Food Standards Agency	**Address**: Aviation House, London WC2B 6NH **Tel:** 020 7272 8829 **Web**: www.food.gov.uk

Consumer Rights

Contact	Details
The Serious Fraud Office	**Address:** 2-4 Cockspur Street, London SW1Y 5BS **Tel:** 020 7239 7272 **Web:** www.sfo.gsi.gov.uk

Data Protection and Freedom of Information

Contact	Details
Information Commissioner's Office	**Address:** Wycliffe House, Water Lane, Wilmslow Cheshire SK9 5AF **Tel:** 0303 123 1113 **Web**: www.ico.org.uk

Healthcare and Social Services

Contact	Details
Care Quality Commission	**Address:** 2nd Floor, Ridgewort House, Worthing, West Sussex BN11 1RY **Tel**: 03000 616161 **Web**: www.cqc.org.uk
Health and Care Professions Council	**Address:** 184 Kennington Park Road, London SE11 4BU **Tel:** 0845 3006184 **Web:** www.hpc-uk.org
The National Society for the Prevention of Cruelty to Children	**Address:** Gillingham Service Centre & Regional Office**,** Pear Tree House, 68 West Street,

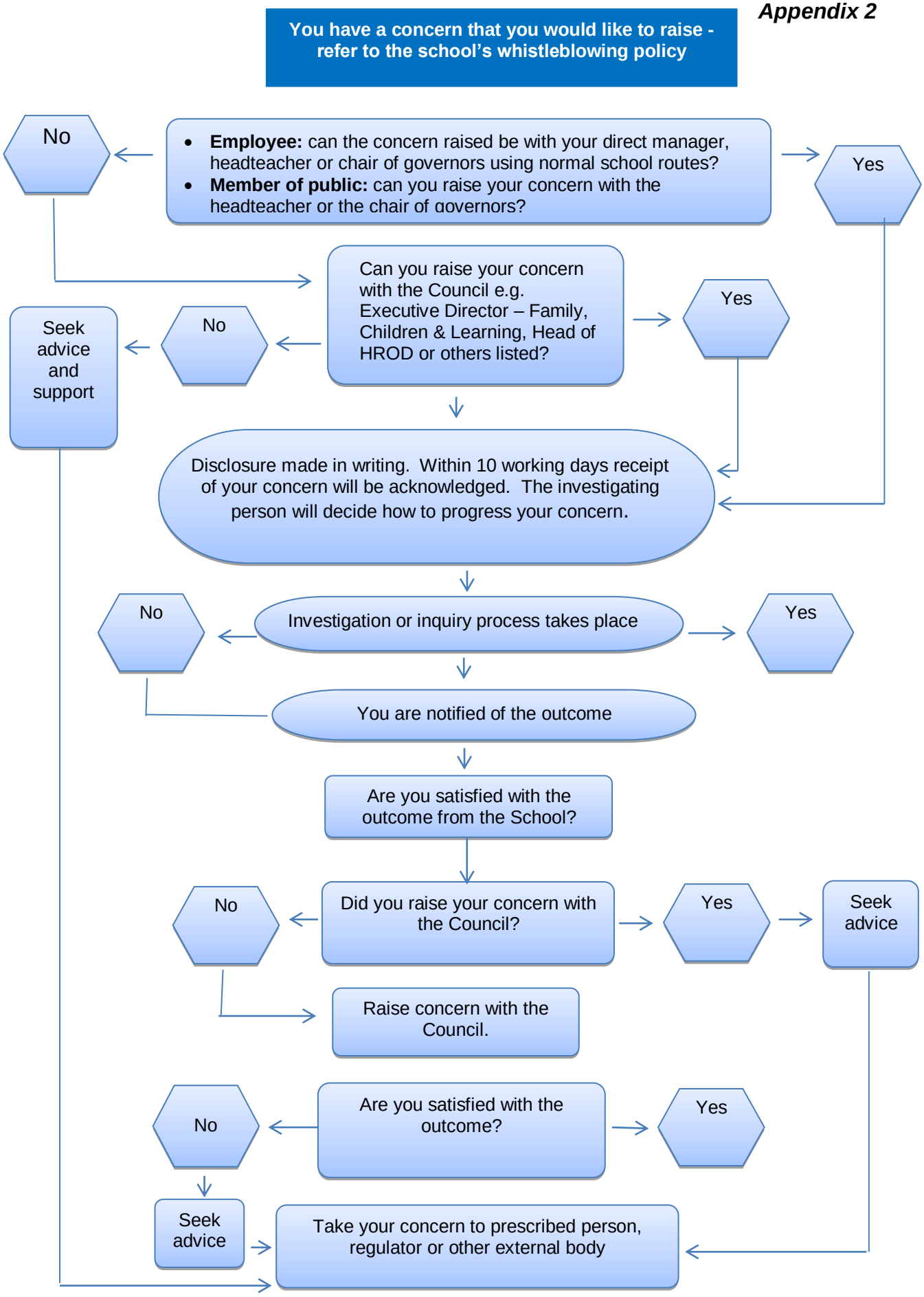
(NSPCC)	Gillingham, Kent ME7 1EF **Tel:** 020 7825 2500 **Web:** www.nspcc.org.uk
Children's Commissioner	**Address:** Sanctuary Buildings, 20 Great Smith Street, London, SW1P 3BT **Tel:** 020 7783 8330 **Web:** www.childrenscommissioner.gov.uk
Nursing and Midwifery Council (NWC)	**Address:** 23 Portland Place, London W1B 1PZ **Tel:** 020 7637 7181 **Web**: www.nmc.org.uk
General Medical Council (GMC)	**Address**: Fitness to Practice Directorate, 3 Hardman Street, Manchester, M3 3AW **Tel:** 0161 923 6602 **Web:** www.gmc-uk.org
Homes and Communities Agency	**Address:** Fry Building, 2 Marsham Street, London SW1P 4DF **Tel:** 0300 1234 500 **Web:** www.homesandcommunities.co.uk

Other Organisations

Contact	**Details**
The Local Government Ombudsman	**Address:** PO Box 4771, Coventry CV4 0EH **Tel:** 0300 061 0614 **Web:** www.lgo.org.uk
Commissioners for Her Majesty's Revenue & Customs (HMRC)	**Address:** HM Revenue and Customs, Freepost NAT22785, Cardiff, CF14 5GX **Tel:** 0800 788 887 **Web:** www.hmrc.gov.uk
Ofsted	**Address:** Piccadilly Gate, Store Street, Manchester M1 2WD **Tel:** 0300 123 1231 **Web:** www.ofsted.gov.uk
Pensions Regulator	**Web:** www.thepensionsregulator.gov.uk
Police	**Tel**: 101 **Emergency**: 999 **Web**: www.police.co.uk
Your Local Councillors	**Web**: www.brighton-hove.gov.uk

N.B Concern is identified as a matter for public interest disclosure – i.e. not a matter to be dealt with through other school policies such as the grievance procedure (employees) or complaints procedures (public)-- see full policy for definitions.

Appendix 2


You have a concern that you would like to raise - refer to the school's whistleblowing policy
No
• Employee: can the concern raised be with your direct manager, headteacher or chair of governors using normal school routes?
• Member of public: can you raise your concern with the headteacher or the chair of governors?
Yes
Can you raise your concern with the Council e.g. Executive Director – Family, Children & Learning, Head of HROD or others listed?
Yes
No
Seek advice and support
Disclosure made in writing. Within 10 working days receipt of your concern will be acknowledged. The investigating person will decide how to progress your concern.
No
Investigation or inquiry process takes place
Yes
You are notified of the outcome
Are you satisfied with the outcome from the School?
No
Did you raise your concern with the Council?
Yes
Seek advice
Raise concern with the Council.
No
Are you satisfied with the outcome?
Yes
Seek advice
Take your concern to prescribed person, regulator or other external body

Appendix 3

Whistleblowing reporting form
Please email completed form to: whistleblowing@brighton-hove.gov.uk

1. Who are you reporting (name of person/department)?

2. Why are you making a report?

3. Do you have any further information?

4. What would you like the Council to do about this?

5. Are you willing to leave your contact details? **These will be kept strictly confidential (unless we receive your consent) and will only be used to**	
Name	
Contact Telephone Number:	
Email:	

If you have not already done so, please read the Council's Whistleblowing Policy before making this report