

Believe • Persevere • Succeed

Whistleblowing Policy and Procedure

Statement of Intention

We are committed to fostering an environment that promotes **our vision** ‘To continue to be recognised as a leading Prep School, providing unforgettable learning experiences which inspire our pupils to **Believe** in themselves, to **Persevere** and **Succeed** in all they do’.

Our policies are designed to support the diverse needs of all our pupils, our staff, and our community. This policy and its procedures have been developed with due regard for our duties and obligations, for the safeguarding and wellbeing of all our pupils.

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Introduction

We are committed to conducting our business with honesty and integrity and expects you and all staff to maintain high standards in accordance with our Staff Behaviour Policy. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

This Policy has been developed to ensure that BPS complies with the Public Interest Disclosure Act 1998 (PIDA), which applies to almost all workers and employees who ordinarily work in Great Britain. The situations covered by this Policy include, but are not limited to:

- criminal offences
- fraud
- malpractice
- risks to health and safety
- failure to comply with a legal obligation
- miscarriage of justice
- environmental damage
- inappropriate behaviour
- unethical conduct

This Policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institution and Public Concern at Work

Principles of the Policy

This Policy is founded on the following principles:

- Staff should be able to raise genuine concerns about wrongdoing openly, responsibly and without fear of reprisals.
- Concerns raised in good faith will be taken seriously and, where appropriate, investigated thoroughly and fairly.
- Confidentiality will be respected as far as is reasonably possible at all stages of the process.
- Individuals making a protected disclosure in accordance with the Public Interest Disclosure Act 1998 will be protected from detriment, intimidation or dismissal.
- This procedure supports — but does not replace — existing management, grievance, disciplinary or complaints procedures. Staff should consider using normal line management processes in the first instance where appropriate.

This Policy applies to all individuals working at all levels of the organisation, including Governors, the Headteacher, members of the Senior Leadership Team, employees, consultants, contractors, trainees, part-time and fixed-term workers, casual and agency staff (referred to collectively as “staff”).

Objectives of the Policy

Our policy on whistleblowing is intended to demonstrate that we:-

- will not tolerate malpractice;
- encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that your concerns will be taken seriously and investigated, as appropriate;
- respect your confidentiality if you raise concerns and we will provide procedures to maintain your confidentiality so far as is consistent with progressing the issues effectively;
- will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- will only invoke the School's Disciplinary Procedure in the case of false, malicious, vexatious or frivolous allegations. The policy seeks to reassure you that you can raise genuine concerns without fear of reprisal, even if you turn out to be mistaken; and
- will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

Scope of this policy

This procedure is separate from our adopted procedures regarding grievances. You should not use the whistleblowing procedure to raise concerns relating to your own personal circumstances, such as the way you have been treated at work. In those cases, the Grievance Procedure, Anti-Harassment and Bullying Policy or Prevention of Sexual Harassment Policy should be used, as appropriate. If you are uncertain whether something is within the scope of this procedure, you should first seek advice from the Head or the Bursar.

This procedure has been implemented to enable you to express a legitimate concern regarding suspected malpractice within the School. It is not intended to address low level concerns, the reporting of which is covered in the School's Safeguarding Policy.

What is a whistleblower?

A whistleblower is a person who raises a genuine concern relating to suspected malpractice within the School. If you have any genuine concerns related to suspected malpractice affecting any of the School's activities (a whistleblowing concern), you should report it under this procedure.

Definition of whistleblowing?

Whistleblowing refers to raising a high level concern and reporting serious wrongdoings within the school. Think: this is serious and it must be escalated.

Raising a whistleblowing concern

This policy applies to all employees (either full or part-time), or others on temporary contract, secondees, trainees or volunteers.

Where there is evidence of any criminal activity or child safeguarding issues, the police and/or the LADO shall be informed immediately, in accordance with BPS's Child Protection and Safeguarding Policy as appropriate.

We hope that in most cases you will be able to raise any concerns with your line manager. Concerns can be raised in person or in writing if preferred. It may be possible to agree a way of resolving your concern quickly and effectively. In some cases this may not be possible and the matter may need to be referred to the Head, Deputy or Bursar.

However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you are at liberty to raise a whistleblowing concern with the Head, Deputy or the Bursar directly. If you feel unable to approach the Head, the Deputy or the Bursar directly, then the Chair of Governors should be the first point of contact.

Confidentiality

We hope that you will feel able to voice whistleblowing concerns openly under this procedure. However, if you wish to raise a concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating the concern to know your identity, this will be discussed with you.

If there is evidence of criminal activity, the Police will be informed in all cases.

We do not encourage you to make disclosures anonymously. However, 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 discuss this with the Head or Bursar 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. Their contact details are set out above

Investigation and Outcome

A meeting will be arranged with you as soon as possible to discuss your concern. You may bring a colleague or trade union representative to any meetings under this procedure. Any companion must respect the confidentiality of the disclosure and any subsequent investigation. You may be required to attend additional meetings in order to provide further information as the concerns raised are investigated.

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. You will be kept informed of the progress of the investigation and its likely timescale. Whenever possible and subject to third party rights, you will be informed of the resolution. However, sometimes the need for confidentiality may prevent us giving specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If you are not satisfied

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can refer the matter to the Chair of Governors. Alternatively, you can follow the external procedure below.

Concerns against Governors

If a concern against a governor is received, then this will be treated in the same way as any other concern. It will receive the same serious consideration. The concern will be raised by the Headteacher with the Chair of Governors who will decide how it should be dealt with.

If the concern is against the Chair of Governors then clearly this process cannot be followed. In such circumstances, the concern will be taken directly to the Headteacher who will decide in consultation with the governor with responsibility for whistleblowing/HR matters how it should be dealt with. In normal circumstances, where the concern is of a safeguarding nature, it would be referred to LADO.

External Procedures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing within the School. In most cases you should not find it necessary to alert anyone externally.

However, if all internal procedures have been exhausted, you shall have a right of access to an external person/body. This may include (depending on the subject matter of the disclosure) HMRC, the Audit Commission, the Health and Safety Executive and/or the Local Authority Designated Officer (where the disclosure relates to a child protection issue).

It will very rarely, if ever, be appropriate for you to alert the media.

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where you may be entitled to raise a concern directly with an external body where you reasonably believe:

- that exceptionally serious circumstances justify it;
- that we would conceal or destroy the relevant evidence;
- that you would be victimised by us; or
- where the Secretary of State has ordered it

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

Malicious Accusations

False, malicious, vexatious or frivolous accusations will be dealt with under our Disciplinary Procedure.

Protection from Reprisal or Victimisation

It is understandable that staff are sometimes worried about possible repercussions as a result of a raising a whistleblowing disclosure. We aim to encourage openness and will support you if you raise genuine concerns under this policy, even if you turn out to be mistaken.

You will not suffer a detriment or be disciplined for raising a genuine and legitimate concern, provided you do so in good faith and following the whistleblowing procedures. If you believe that

you have suffered any such treatment, you should inform [the Head, Deputy or Bursar] immediately. If the matter is not remedied, you may raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

Safeguarding

If a member of staff suspects that there is a serious safeguarding issue that they feel that the Headteacher is not taking seriously or that they believe there is a serious safeguarding issue involving the Headteacher they should in the first instance contact the Chair of Governor.

Self-reporting

There may be occasions where a member of staff has a personal difficulty, or perhaps a physical or mental health problem, which they know to be impinging on their professional competence. Staff have a responsibility to discuss such a situation with their line manager so professional and personal support can be offered to the member of staff concerned. Whilst such reporting will remain confidential in most situations, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of children.

Further advice and support

It is recognised that whistleblowing can be difficult and stressful. Advice and support is available from your line manager, HR department and/or your professional trade union.

If you feel unable to raise an issue with us or feel that your genuine concerns are not being addressed, you may report your concerns to other whistleblowing channels, such as:

- Protect, an independent whistleblowing charity (helpline: 020 3117 2502, email: whistle@protect-advice.org.uk, website: <https://protect-advice.org.uk/>).
- The NSPCC whistleblowing helpline (tel: 0800 028 0285 or email: help@nspcc.org.uk).

Feedback

All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Headteacher in the first instance.

Appendix 1 Justification

Don't think what if I'm wrong – think what if I'm right

Reasons for whistleblowing:

Each individual has a responsibility for raising concerns about unacceptable practice or behaviour.

- To prevent the problem worsening or widening.
- To protect or reduce risks to others.
- To prevent becoming implicated yourself.

What stops people from whistleblowing:

- Starting a chain of events which spirals.
- Disrupting the work or project.
- Fear of getting it wrong.
- Fear of repercussions or damaging careers.
- Fear of not being believed.

How to raise a concern:

- You should voice your concerns, suspicions or uneasiness as soon as you feel you can. The earlier a concern is expressed the easier and sooner action can be taken.
- Try to pinpoint exactly what practice is concerning you and why.
- Approach your Professional Mentor, Headteacher, or the Designated Child Safeguarding Officer.
- If your concern is about your immediate manager/Headteacher, or you feel you need to take it to someone outside the school contact the school Governors
- Make sure you get a satisfactory response – don't let matters rest.
- You should then put your concerns in writing, outlining the background and history, giving names, dates and places where you can.
- A member of staff is not expected to prove the truth of an allegation but will need to demonstrate sufficient grounds for the concern.

Related policies

This policy sets out the whole school expectations in contributing to an outstanding learning environment. It should be read in conjunction with the following policies.

Early Years Policy	Activate Handbook
Positive Behaviour Policy:	Staff Code of Conduct
Anti Bullying Policy	Safeguarding Policy
Care and Supervision Policy	Prevention of Sexual Harassment Policy

This policy is in line with:

- Keeping Children Safe in Education (September 2024)
- Working Together to Safeguard Children (February 2024)
- Health and Social Care Act 2008 (Regulated Activities) Regulations, part 3 (2015)
- And giving due regard to Prevent Duty Guidance (March 2024)

Policy Review and Dissemination

All members of staff and governors will receive a copy of this policy (via TEAMS link).

The policy will be available for Parents on our website. A paper copy can be requested via the School Office office@bowdonprep.org.uk

SLT member responsible	K Pheasant and S Hughes
Governor / Board Responsible	Business Committee
Date of review	February 2026
Date of next review	February 2028

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