Wimbledon Chase Primary School

Empowering individuals to thrive and contribute positively in a diverse and ever-changing world

Managing Whistleblowing Concerns in Schools Policy

September 2026

At Wimbledon Chase Primary School, policies are designed to ensure that the child is at the centre of all our decision making. All staff are aware that whole school and class systems are established to ensure that every child is able to share and express their concerns in a safe and confidential manner. We constantly strive to ensure that all children know their worries and views will be taken seriously by all staff and that every child will be treated with respect.

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Introduction

This procedure is intended to apply to all members of staff employed in this school (whether full-time or part-time, permanent or temporary) including contractors working for the school and partner agencies. It also covers any suppliers and those providing services under a contract or in partnership with the school.

This document sets out the procedures to be followed to allow a member of staff to blow the whistle so that such issues are raised at an early stage and in the right way on their merits.

This School welcomes staff to raise their concerns and is committed to dealing responsibly, openly and professionally with them. In turn this will allow the Governance Board to deliver a safe service and protect the interests of the school, staff and public.

This Whistleblowing Policy is for use for all staff who have a concern about danger or illegality that has a public interest aspect to it, usually because it threatens others (e.g. parents, stakeholders or the public). A grievance or private complaint is, by contract, a dispute about a staff member's own employment position and has no additional public interest dimensions.

If a member of staff is aggrieved about issues relating to their employment, such as terms and conditions of employment, health and safety, equal opportunities, organisational change, relationships at work or the behaviour of others at the school towards them including bullying and harassment or discrimination or their working environment please use the Schools Grievance policy.

In order for the process to be managed effectively the Headteacher will ensure that all staff under their management are fully conversant with the procedure.

1. Purpose of the Policy

The purpose is as follows:

- To encourage staff to feel confident in raising concerns.
- To enable staff to confidentially raise concerns within the school environment.
- To ensure staff receive a response to their concerns and if not satisfied they are aware of how to pursue them.
- To reassure staff that they will be protected from reprisals or victimisation where they reasonably believe the disclosure to be made in the public interest.

This Whistleblowing Procedure is primarily for concerns where the interests of others or of the School are at risk.

General Principles underlying this policy

1.1 Confidentiality

The Whistleblowing process requires that both Headteachers/ line managers treat all information about any staff members with sensitivity and in strict confidence. A breach of confidentiality could result in formal disciplinary action.

Wherever possible the school seeks to respect the confidentiality and anonymity of the Whistleblower and will as far as possible protect staff from reprisals. The school will do its best to protect a staff members identity when they raise a concern and do not want their name disclosed. However, it must be appreciated that the investigation process may reveal the source of the information and a statement by the staff member may be required as part of the evidence in criminal proceedings or Employment Tribunals.

The school will endeavour to ensure that a member of staff's identity will not be disclosed to third parties without a court order.

Where the procedure allows a matter to be taken outside the School, staff should not disclose confidential information unless the information relates to the matter under investigation and until the internal procedures have been exhausted. No confidential information shall be disclosed externally in a frivolous or vexatious manner.

1.2 Consistency of Treatment and Fairness

The governance board is committed to ensuring consistency of treatment and fairness. It will abide by all relevant equality legislation, including the duty to make reasonable adjustments for disabled staff. The governance board is aware of the guidance on the Equality Act issued by the Department for Education.

1.3 Support for Staff

It is recognised that raising concerns can be difficult and stressful. Advice and Support is available via a staff member's line manager, Headteacher or Trade Union representative. It must be recognised that members of staff who are subject to investigation following concerns being raised will also be entitled to support from the same sources, although not from the same individuals.

The Council provides an Employee Assistance Programme (EAP) for members of staff employed in schools and who purchase this service. It can provide support including regarding employment issues, consumer rights. Contact details are a free 24 Hour Confidential Helpline:
0800 030 5182. Information can be found at https://healthassuredeap.co.uk/. The login is **Merton** and the password is **EAP**.

The school will take steps to minimise any difficulties which staff may experience as a result of raising a concern. For instance, if staff are required to give evidence in criminal or disciplinary proceedings the School/Council will arrange for you to receive advice about the procedure.

Help will be provided to staff in order to minimise any difficulties which they may experience. This may include advice on giving evidence if needed. Meetings may, if necessary be arranged off-site with staff and with a Trade Union representative for support, if so wished.

If staff believe they have suffered a detriment for having raised a concern, this should be reported.

1.3 Monitoring and Evaluation

The governance board and Headteacher will monitor the operation and effectiveness of the school's whistleblowing arrangements. This will include ensuring that the arrangements minimise the impact on workload for all parties involved whilst ensuring a full and fair procedure is followed.

The London Borough of Merton's Monitoring Officer will maintain a Corporate Register containing all concerns that are brought to their attention. This register will include details of who raised the concern/s (if available), the department/school the concerns relate to, a brief summary of the concern/s, conclusion of the investigation, any action taken and any other relevant information. The Monitoring Officer will report the number of whistleblowing cases received and a summary of the outcome to the Audit Committee on an annual basis.

1.4 Retention

The governance board and Headteacher will ensure that all written records are retained and stored in a secure place in line with their Retention and Disposal Policy

1. Definitions

Unless indicated otherwise, all references to "staff" means all staff including anyone on a temporary or fixed term contract employed in this school.
For the purposes of this model policy the term governance board should be considered to include reference to governing bodies.

The school has a range of policies and procedures, which deal with standards of behaviour at work; for example, discipline, grievance, recruitment and selection. Staff are encouraged to use these procedures when appropriate.

This policy is a means to deal with serious or sensitive concerns about matters such as the following:

- Fraud or financial irregularity
- Corruption, bribery or blackmail
- Failure to comply with legal or regulatory duty or obligation.
- Disclosures related to miscarriages of justice.
- Dangerous procedures risking Health and Safety, including risk to the public as well as other members of staff.
- Damage to the environment.
- Other unethical conduct, including deliberate concealment of information relating to the above
- Action which is contrary to the code of conduct for staff or governors.
- The inappropriate use of the School's/Council's standing orders and financial procedures.
- Conduct which is a criminal offence or a breach of law.

The policy does **not** apply to the following:

- Relationships between members of staff, their managers and the School for which grievance and other dispute procedures are more appropriate.
- Concerns or complaints by members of the public to which the Schools Complaints Procedure would apply
- Concerns or complaints about the behaviour of Governors to which the Governor Code of Conduct would apply.

What protection do staff have?

o The Public Interest Disclosure Act provides workers with protection from dismissal or other damage as a result of making a disclosure of information in the public interest about wrongdoing at work. Such disclosures are protected if they are done according to the Act's provisions. Disclosures may be made to the employer, prescribed regulatory bodies or on a wider basis to the Police. The Act's protection is strongest where workers raise matters with their employers.

o The Schools and Council are committed to adhering to this Act and to provisions contained within this Policy. If staff raise a genuine concern in accordance with this Policy, they will not be at risk of losing their job or suffering any form of retribution as a result. The School will not tolerate any reprisal against a member of staff because he or she has raised a concern under the Code and will treat any such reprisal as a disciplinary matter.

o Provided staff are acting honestly; it does not matter if they are mistaken or if there is an innocent explanation for their concerns. Staff will not be asked to provide proof. Of course, this assurance is not extended to someone who maliciously raises a matter they know is untrue. Disciplinary action will be taken against members of staff who knowingly make false allegations.

o Giving out information about third parties to whom the School/Council owe a duty of confidence may not be protected under the Public Interest Disclosure Act. This may lead to disciplinary action. If staff are in any doubt, they should seek advice from your Headteacher/line manager or trade union representative.

1.Raising unfounded malicious concerns

Staff are encouraged to come forward in good faith with genuine concerns with the knowledge they will be taken seriously. If a member of staff makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. However, when it appears that there are clear grounds for suggesting that a member of staff may have acted frivolously, maliciously or vexatiously, this will be taken seriously and may constitute a disciplinary offence.

2. Delegation

Normal rules apply in respect of the delegation of functions by Governance Boards, Headteachers and local authorities.

The Headteacher will be responsible for ensuring that appropriate action is taken and may delegate initial action to the appropriate line manager, Deputy Headteacher or Assistant Headteacher.

If the Headteacher is involved in the investigation process or any initial action s/he will seek that Governors meet to decide actions to be taken. Human Resources advice should be sought throughout the procedure.

In some circumstances, it may be necessary to consider using an investigator who is not a member of the school staff or governing body.

Whistelbowing concerns should not be discussed or reported in any detail at any full Governing Body meeting until there are no issues outstanding. Any matters discussed should be general and brief. At the end of the procedure a short report to governors may summarise briefly the nature of the incident and the outcome.

Headteachers and Governing Bodies should make every attempt to follow the correct and agreed procedures and timescales and should not attempt to foreshorten the procedures under any circumstances.

Governing Bodies and Headteachers are advised to consult with their HR provider at all stages of the procedures for advice if they are to avoid cases of unfair treatment and claims to an Employment Tribunal. Failure to consult and/or ignoring advice offered by your HR provider may result in costs incurred at an Employment Tribunal being met by the school from their delegated budget.

4. Relationship with other procedures

These guidelines provide the process for dealing with whistle blowing issues relating to a member of staff's behaviour. However, there will be occasions where it becomes apparent that the case may relate to or involve other policies and procedures. These may include, for example,

- Disciplinary Procedures
- Capability Procedure
- Grievance Procedure.

Schools should seek advice from their HR provider if they are unclear which procedure is relevant.

5. Employee Representatives

Staff may be accompanied and represented by a representative of a Trade Union who has been certified by their union as being competent or a work colleague at all formal stages of these procedures.

6. Scope of the procedure

The procedure followed should be fair and transparent and accessible and applies to all school-based staff.

The school recognises that the decision to report a concern can be a difficult one to make. If what staff are saying is true, they should have nothing to fear because they will be doing their duty to your employer and those for whom a service is provided.

If a member of staff is dissatisfied with the application of this policy, they may raise a grievance.

7. Basic Principles

The school encourages staff to raise matter's internally in the first instance. This allows staff and those in positions of responsibility and authority the opportunity to right the wrong and provide an explanation for the behaviour or activity.

Where staff make a disclosure, they are encouraged to give details of their identity as anonymous disclosures are more difficult to investigate.

8. THE PROCESS

What action should staff take?

As a first step, staff should normally raise concerns with their line manager, Headteacher or Chair of Governors. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. If the circumstances make contacting a line manager not appropriate, then you can use the Whistleblowing Hotline 020 8871 8383.

Concerns made in writing should set out the background and history of the concern, giving names, dates and places where possible and the reason why there are particular concerns about the situation. The earlier the concern is expressed, the easier it is for someone to take action.

If staff need advice and guidance on how matters of concern may be pursued, this can be obtained from Headteacher, trade union representative, or the South West London Fraud Partnership

If you are not in a formal line management relationship because of your employment relationship, e.g., agency staff or contractors, you should first discuss your concerns with a relevant colleague or line manager within the team/school.

How will the school respond?

The individual who receives the information or allegation will assemble the information made available to them. The details of the allegation are then immediately passed on to the Council's Head of Internal Audit in order that it can be included on the central Whistleblowing register.

An appropriate investigating officer is then appointed by the Headteacher/Chair of Governors, dependent on the nature of the allegation. The investigating officer(s) will carry out a preliminary investigation. This will seek to establish the facts of the matter and assess whether the concern has foundation and can be resolved internally. The initial assessment may identify the need to involve third parties to provide further information, advice or assistance. This could involve for example members of staff, the Council's Internal Audit service, external audit, legal or HR advisors, or the police. Concerns or allegations, which fall within the scope of specific procedures (e.g., child protection, Health and Safety or discrimination issues), will normally be referred for consideration under those procedures. It may be decided to use an external investigation officer to undertake the investigation or it may be passed to external audit to investigate, depending on the nature of the allegation.

Fraud allegations will be passed to the South West London Fraud Partnership (SWLFP) to carry out the investigation.

The staff member raising the concern will be informed within 4 weeks of receipt of the Whistleblowing, how and by whom the concerns will be handled and an estimate of how long the investigation will take and where no further action is proposed, reasons for this decision

Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer(s) will consider how best to report the findings and what corrective action needs to be taken. This may include some form of disciplinary action or third-party referral such as the police.

The amount of contact between the investigating officers considering the issues and the staff member will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, further information will be sought from staff as part of the investigation process. If the investigating officer invites a member of staff to attend a meeting, they will have the right to be accompanied. This should be a representative of a recognised trade union, or a work colleague who is not involved in the area of work to which the concern relates.

The school will take steps to minimise any difficulties that staff may experience as a result of raising a concern. For instance, if staff are required to give evidence in criminal or disciplinary proceedings, the School/Council will advise on the procedure.

A confidential record of the concern will be kept and held in accordance with relevant data protection legislation.

Whenever possible, members of staff will be given feedback on the outcome of any investigation.but may not be able to tell you about the precise actions taken where this would infringe a duty of confidence the school owe to another person.

If a member of staff is satisfied with the action taken by the school/Council and feel its right to question the matter further staff may consider the following possible contact points:

- External Auditor
- their Trade Union
- the Citizens Advice Bureau and / or law centre / firm
- relevant professional bodies or regulatory organisations
- the Local Government Ombudsman
- the Information Commissioner
- a relevant voluntary organisation
- the Police and/ or Health and Safety Executive

9. How the matter can be taken further

If staff have raised a concern, but feel this has not been resolved or that the matter is so serious or sensitive that they cannot discuss it with their line managers please contact one of the following: -

 Head of Internal Audit 020 8545 3149 **Monitoring Officer** 020 8545 3338 **Interim Head of HR** 020 8545 3152

● If the concern involve potential fraud or criminal activities the Councils Fraud hotline 020 8871 8383 or email swlfp@richmondandswandsworth.gov.uk

Staff may prefer to raise the matter in person, by telephone or in written form marked private and confidential and addressed to one of the above named individuals. All matters will be treated in strict confidence and anonymity will be respected wherever possible

10. Referral outside the School/ Council

In exceptional circumstances staff may consider the matter too serious or sensitive to raise within the internal environment of the School/Council. In this instance, depending on the nature of the concern, the matter could be directed to the police or local MP (contact through directory enquiries or local telephone directory).

The Comptroller and Auditor General is a prescribed person, to whom external persons can make disclosures relating to "the proper conduct of public business, value for money, fraud and corruption in relation to the provision of public services". Their Whistleblowing hotline **020 7798 7999**

The Act does not require the C&AG to investigate every disclosure s/he receives; their decision whether or not to investigate is based upon various criteria designed to ensure the most effective use of the resources at their disposal in safeguarding the public interest.

The Comptroller and Auditor General
National Audit Office
157-197 Buckingham Palace Road
London SW1W 9SP

The councils external auditor is Ernst & Young:- http://ey.com

Ernst & Young

1 More London Place
London SE1 2AF
Tel: 020 7951 2000

The Local Government Ombudsman can also be contacted, they will not however, take any action until the allegation has been dealt with internally first. They can be contacted at: - http://www.lgo.org.uk/

Telephone the LGO Advice Team on 0300 061 0614 or Text 'call back' to 0762 481 1595.

Further information may be obtained from the following:

Citizens Advice Bureau https://www.citizensadvice.org.uk/about-us/contact-us/
The Information Commissioner http://www.ico.gov.uk/
Health and Safety Executive http://www.hse.gov.uk/
Care Quality Commission http://www.cqc.org.uk/contact-us/reportconcern/report-concern-if-you-are-member-public
Ofsted (Whistleblowing hotline) 0300 123 3155 whistleblowing@ofsted.gov.uk

In summary do:

- Make an immediate note of your concerns
  - Note all relevant details, such as what was said in telephone or other conversations, the date, time and the names of the parties involved.
  - Note any documentary evidence that may exist to support the claim but do not interfere with this evidence.
- Report your concerns
  - to your Headteacher/line manager/Chair of Governors or to those listed above in Sections 9
- Deal with the matter quickly. Any delay could allow the problem to continue and escalate and evidence to disappear
- Think about risks and outcomes before you act
- Follow the guidance provided and contact the appropriate officer

In summary don't:

- Do nothing and let it go unreported
- Be afraid of raising concerns
- Approach and accuse individuals directly
- Try and investigate the matter yourself
- Convey your suspicions to anyone except those of the proper authority as set out in our policy.
- Use the whistleblowing procedure to pursue a personal grievance

School Development Area Leader: Mrs Caroline Gibbins

Linked Governor: Fiona Hunter

Signed: Caroline Gibbins

Signed: Fiona Hunter

Date agreed: September 2026

Review date: September 2028