



Confidential Reporting Policy (Whistleblowing) (Adopted from CBC)

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Lead reviewer: Greg McGill

Introduction

1.1. The Governing Body is committed to the highest possible standards of openness, probity, and accountability. In line with that commitment, we expect employees and others we deal with who have serious concerns about any aspect of the School's work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.

All maintained schools are required to have whistleblowing arrangements in place, and Governing Body minutes should record that they do.

1.2. Employees are often the first to realise that there may be something seriously wrong within the School. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to their employer. They may also fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

1.3. The **Public Interest Disclosure Act 1998 (PIDA)** encourages individuals to raise concerns about malpractices in the workplace. This policy document makes it clear that employees can raise serious concerns without fear of victimisation, subsequent discrimination, or disadvantage. It is intended to encourage and enable employees to raise those concerns within the School rather than overlooking a problem.

1.4. This policy acknowledges amendments made to PIDA by the **Enterprise and Regulatory Reform Act 2013**, as well as requirements set out in the DfE statutory guidance **Keeping Children Safe in Education 2026 (KCSIE)**.

1.5. This policy applies to all employees, volunteers, agency staff, supply teachers, contractors working on School premises (e.g., builders, catering, IT support), suppliers, and service providers. Members of the public are also encouraged to raise concerns, which will be responded to in accordance with this policy.

1.6. These procedures are in addition to the School's complaints procedures and other statutory reporting procedures. The Headteacher is responsible for making staff and service users aware of the existence of these procedures.

Aims and Scope of this Policy

2.1. This policy aims to:

- Encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice.
- Provide clear avenues for you to raise those concerns and receive feedback on any action taken.
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.
- Reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that any disclosure is made in the public interest.

2.2. The Confidential Reporting Code is intended to cover major concerns that fall outside the scope of other policies and procedures (such as the staff Grievance Procedure, which enables you to lodge a grievance relating to your own contract or terms of employment). Personal grievances (e.g., individual workplace bullying, harassment, or discrimination) are not covered by whistleblowing law unless the particular case is in the public interest.

If the Governing Body or Local Authority considers that a concern raised under this policy should more properly be dealt with under another policy (e.g., Grievance, Safeguarding/Child Protection, or Disciplinary), the whistle-blower will be referred to that policy.

Qualifying Disclosures

A **qualifying disclosure** is a disclosure made in the public interest by a worker who has a reasonable belief that one or more of the following is occurring, has occurred, or is likely to occur:

- A criminal offence (including fraud, bribery, theft, or financial malpractice)
- A failure to comply with any legal obligation
- Miscarriages of justice
- Danger to health and safety (including safety risks to pupils, staff, or the public)
- Damage to the environment
- Unauthorised or improper use of public or school funds
- Child protection, safeguarding concerns, or physical/sexual abuse
- Failure to adhere to professional standards or unethical conduct
- Deliberate concealment of any of the above

2.3. You can report any serious concern about service provision, school administration, or the conduct of school staff, governors, local authority officers, or contractors. This includes conduct that:

- Makes you feel uncomfortable in terms of established standards or ethical practices;
- Breaches school policies, standing orders, or statutory obligations;
- Falls below established professional standards; or
- Amounts to improper conduct or abuse of authority.

Safeguards and protections

Harassment or Victimisation

3.1. The Governing Body is committed to good practice and high standards and will support employees and workers who raise concerns under this policy.

3.2. The Governing Body recognises that deciding to report a concern can be difficult. If you raise a concern in good faith and with a reasonable belief that it is in the public interest, you have nothing to fear—you are fulfilling your professional duty to your employer, pupils, and the public.

3.3. The Governing Body will not tolerate any bullying, harassment, or victimisation (including informal pressure) by managers or colleagues. Appropriate disciplinary action will be taken against anyone who subjects a whistle-blower to victimisation or detriment.

3.4. Under statutory protections, you have the right not to be dismissed or subjected to any detriment on the grounds that you have made a protected qualifying disclosure.

3.5. Any investigation into potential malpractice will proceed independently of any ongoing disciplinary, sickness, capability, or redundancy procedures affecting the whistle-blower.

Confidentiality and Anonymity

Confidentiality

4.1. All concerns will be treated in confidence, and every effort will be made not to reveal your identity if you request confidentiality. However, an investigation process may eventually require evidence where identity cannot remain hidden (e.g., if a formal witness statement is needed). In such cases, the person leading the investigation will discuss this with you beforehand and offer appropriate support.

4.2. If legal or criminal proceedings follow a disclosure, disclosure of identity may be required by law. You will be informed before your identity is released.

Anonymous Allegations

5.1. Staff are encouraged to put their name to allegations whenever possible, as anonymous reports are significantly harder to investigate and verify.

5.2. Anonymous concerns will be considered at the discretion of the Governing Body / Local Authority. In exercising this discretion, factors considered include:

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

5.3. Anonymous whistle-blowers should note that feedback on the outcome of an investigation cannot be provided if contact details are withheld.

Untrue or Malicious Allegations

6.1. If an allegation is made in good faith / reasonable belief, but is not confirmed by an investigation, no action will be taken against the whistle-blower.

6.2. If, after investigation, an allegation is found to have been made maliciously, or for personal gain, disciplinary action may be taken against the individual under the School's Disciplinary Procedure.

How to raise a concern internally

7.1. As a first step, you should normally raise concerns with the Headteacher or Deputy Headteacher. This depends however, on the seriousness and sensitivity of the issues involved and who is

First Step: As a general rule, concerns should be raised directly with the **Headteacher** or **Deputy Headteacher**.

7.2. Escalation Routes:

- If your concern involves the Headteacher or Deputy Headteacher, you should contact the **Chair of Governors (Andrew Güntert)**.
- If your concern involves the Chair of Governors or the entire Governing Body, you should contact the **Central Bedfordshire Council Monitoring Officer**.

7.3. **Format:** Concerns may be raised verbally or in writing. Written reports should include:

- Background and history of the concern (including dates, times, and locations where possible);
- The reasons why you are particularly concerned about the situation; and
- Any supporting evidence or details known at the time.

If a concern is raised verbally, a written summary note will be taken following the same format.

7.4. You are not required to prove the truth of an allegation beyond reasonable doubt, but you must demonstrate reasonable grounds for your concern.

7.5. You may invite a Trade Union representative or a work colleague to accompany you during any meetings or interviews regarding the concerns raised.

How the School/Governing Body/ the Council will respond

8.1. Within **ten (10) working days** of receiving your concern, the receiving officer/governor will write to you to:

- Acknowledge receipt of the concern;
- Indicate how the matter is proposed to be dealt with;
- Give an estimate of how long a full investigation will take;
- State whether initial enquiries have been made;
- Provide information on employee support mechanisms (e.g., Occupational Health / EAP); and
- State whether further investigations will take place and, if not, explain why.

8.2. Depending on the nature of the issue, concerns may:

- Be investigated internally by management, internal audit, or through the formal disciplinary process;
- Be referred to the Police or relevant law enforcement agency;
- Be referred to the Local Authority Designated Officer (LADO-Stephan Lagan) / Safeguarding team;
- Be referred to external auditors; or

- Form the subject of an independent inquiry.

8.3. Subject to legal constraints and confidentiality obligations towards others, you will be informed of the outcome of any whistleblowing investigation.

Monitoring and Oversight

9.1. The Local Authority Monitoring Officer has overall responsibility for maintaining and operating the Council's Whistleblowing framework.

9.2. A confidential record of concerns raised under this policy and their outcomes is maintained to monitor compliance, systemic issues, and progress.

External Reporting/Taking Matters Further

10.1. This policy is designed to enable concerns to be resolved internally within the School or Local Authority. However, if you feel dissatisfied with the outcome or believe it is necessary to report externally, you may contact external prescribed bodies.

10.2. Staff may obtain free, confidential advice from the independent whistleblowing charity

10.3. The following are possible external contact points:

Protect:

- **Website:** protect-advice.org.uk
- **Advice Line / Contact:** protect-advice.org.uk/contact-protect-advice-line

Central Bedfordshire Council Monitoring Officer: monitoringofficer@centralbedfordshire.gov.uk

NSPCC Whistleblowing Helpline for School Staff:

- Phone: 0808 800 5000
- Email: help@nspcc.org.uk

Department for Education (DfE): gov.uk/government/organisations/department-for-education

Ofsted: whistleblowing@ofsted.gov.uk / 0300 123 3155

Your Trade Union / Professional Association

The Police

The Council's External Auditor