Whistleblowing Policy

Headlands School

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1. Introduction

This policy forms part of Headlands School Staff Code of Conduct and should be read in conjunction with the school's Child Protection & Safeguarding Policy and Low-Level Concern policy. This Whistleblowing policy is based upon the statutory Public Interest Disclosure Act (1998) (PIDA) which protects any whistleblowing worker who discloses their concerns in the public interest. Alongside this legislation is the guidance 'Keeping Children Safe in Education 2026 (KCSiE 2026)'.

KCSIE 2026 states what school or college staff should do if they have concerns about safeguarding practices within the school or college:

- *72. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or college's safeguarding provision and know that such concerns will be taken seriously by the senior leadership team.*
- *73. Appropriate whistleblowing procedures should be put in place for such concerns to be raised with the school or college's senior leadership team.*
- *74. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them*

    - general advice on whistleblowing can be found at https://www.gov.uk/whistleblowing
    - the NSPCC Whistleblowing Advice Line is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – and the line is available from 08:00 to 20:00 Monday to Friday, and 09:00 to 18:00 at weekends. The email address is help@nspcc.org.uk

It is the clear responsibility of all members of staff and volunteers to act on any concerns or information that give them concern about the safety and wellbeing of a child or children arising from circumstances or events out of school. Equally it is the responsibility of all members of staff and volunteers to act on any concerns or information that give them concern about the safety and wellbeing of a child or children within the school or within the care of the school.

Such a concern in a safeguarding context may be related to:

- the conduct or behaviour of a member of staff or volunteer towards an individual child or children.
- information that suggests a member of staff or volunteer is unsuitable to work with children.
- belief that the Designated Safeguarding Lead (DSL), senior leaders or governors have failed to take appropriate action in response to safeguarding concerns raised

This policy aims to:

- encourage individuals affected to report suspected concerns and wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated, and that their confidentiality will be respected.
- let all staff in the school know how to raise concerns about potential wrongdoing in or by the school.
- set clear procedures for how the Headteacher will respond to such concerns
- let all staff know the protection available to them if they raise a whistleblowing concern.
- assure staff that they will not be victimised for raising a legitimate concern through the steps set out in the policy, even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue)

This policy does not form part of any employee's contract of employment and may be amended at any time. The policy applies to all employees or other workers who provide services to the school in any capacity including self-employed consultants or contractors who provide services on a personal basis and agency workers etc.

2. Legal Context

Public Interest Disclosure Act (1998) (PIDA)

This policy is drafted in line with the provisions of the Public Interest Disclosure Act (1998) (PIDA). The Act protects you from detrimental treatment or victimisation by your employer if, in the public interest, you disclose a concern regarding any wrongdoing.

Examples of concerns that you may raise include, but are not limited to:

- Data protection issues
- Fraud or theft
- Breaches of policies and procedures
- Conflicts of interest
- Safeguarding issues
- Health and safety

Please also see Appendix 3.

3. Policy Statement

The Governing Body is committed to running the school in the best way possible, maintaining an effective safeguarding culture and associated procedures. This policy seeks to reassure people that it is safe and acceptable to speak up and to raise any concern that they may have at an early stage and in the right way. Rather than wait for proof, the Governing Body would prefer people to raise their concern as soon as they feel able to do so.

3.1. Aims of the policy

The Whistleblowing Policy aims to:

- encourage a person to feel confident in raising concerns and to question concerns that they may have about perceived wrong doings.
- provide a clear process in which they can communicate their concerns.
- ensure that they receive a response to concerns and are aware of how they can pursue the complaint further if they are not satisfied with the school's response.
- reassure them that if their disclosure is genuine, they will be protected from harassment, reprisals, or victimisation by anyone working for or with the school.

3.2. Who does the Whistleblowing Policy apply to?

All those who work in a school in a paid or unpaid capacity, including, but not limited to:

- employed (full-time or part-time)
- individual or organisation is using the school premises for the purposes of running activities for children (KCSiE 2026)
- subcontracted to deliver a service to a school
- working as a consultant
- employed through an agency
- volunteer

If you have a Whistleblowing concern, you are encouraged to notify the Headteacher as soon as is practicably possible.

3.3. What is the purpose of the Whistleblowing Policy?

The Whistleblowing Policy provides guidance and clarity and is primarily for concerns where there is a risk that is in the public interest. It supports instances whereby:

- a person may be worried about raising a concern and may think it best to keep it to themselves, perhaps feeling it's none of their business or that it's only a suspicion and may feel that raising the matter would be disloyal to colleagues or the senior leadership of the school.
- a person may decide to say something but find that they have spoken to the wrong person or raised the issue in the incorrect way and are not sure what to do next.

3.4. Is the person using the correct policy?

If something is troubling a person and they think that the school should know about or investigate it, please use this policy, alongside the Low-Level Concerns Policy. If, however, they wish to make a complaint about their employment or how they have been treated, they are encouraged to use the contract of employment for reference

and Human Resources (HR) Manager for advice. The Low-level Concerns Policy is located on Google Drive, aStaff Information 2026-2027, KCSiE and Wider Key Policies.

4. Involved Parties

4.1. Governing Body and Headteacher

The Governing Body and Headteacher are responsible for:

- establishing a culture whereby all individuals fully understand that it is safe and accepted to raise Whistleblowing concerns
- establishing a culture whereby all individuals fully understand that leaders actively want and expect individuals to raise Whistleblowing concerns
- ensuring that victimisation of anyone who uses the Whistleblowing procedure is not tolerated

This includes school staff (refer to 3.2 of others to be considered) and any related incidents when an individual or organisation is using the school premises for the purposes of running activities for children (KCSiE 2026).

4.2. Headteacher or Chair of Governors

The governing body has designated the Headteacher / Chair of Governors specifically to deal with matters concerning whistleblowing.

Their responsibilities are to:

- reassure and support individuals to use these procedures
- receive concerns raised by individuals
- respect an individual's request that a concern is raised in confidence
- ensure that they effectively communicate with individuals
- ensure staff record concerns on the school's reporting forms (Example of the concerns reporting form is Appendix 3 in the Low-level Concerns Policy)
- ensure that an initial assessment or preliminary investigation is carried out and if needed, an Investigating Officer appointed to lead the investigation
- acknowledge the concern to the person raising it, within ten days of it being raised and, in the acknowledgement, outline:

    - how it is proposed to deal with the matter
    - how long it will take to provide a final response
    - whether any initial enquiries have been made
    - information about individual support mechanisms

Where appropriate, inform the person against whom alleged concerns have been raised, of the nature of the concerns and how it is proposed to deal with the matter.

If the concern is about the Headteacher, then the designated person is the Chair of Governors. If the concern is about the Chair of Governors, then the designated person is the Director of Children's Services.

4.3. Whistleblower (the person raising the concern) should:

- raise the concern in 'good faith'
- report the concern to the appropriate person in the school, e.g., Headteacher or Chair of Governors and, in exceptional cases, outside the school governing body.
- Follow a clear reporting procedure for children, parents, and other people to report concerns or complaints, including abusive or poor practice – see Section 6 below.

We also acknowledge that low-level concerns can arise in several ways from various sources, e.g., suspicion, complaint, or a disclosure. Procedures are in place for confidentially sharing and handling of low-level concerns.

A 'low-level' concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the school / college may have acted in a way that is inconsistent with expectations and the Staff Code of Conduct, including inappropriate conduct outside of work and does not meet the 'harm threshold' or is otherwise not serious enough to consider a referral to the Local Authority Designated Officer (LADO). The Low Level Concern Policy can be located on Google Drive, aStaff Information 2026-2027, KCSiE and Wider Key Policies.

4.4. Trade Unions and Professional Associations (or work colleague)

- may support the Whistleblower to lodge the concern(s)
- may support the Whistleblower to formally present their concerns to the appropriate person

A representative cannot speak on behalf of the Whistleblower.

4.5. Local Authority

Where the concern is raised directly with the Local Authority, the relevant designated professional will provide advice and guidance to the school:

- Local Authority Designated Officer (LADO)
- The Safeguarding in Education Team (SiET)
- Director of Children and Young People, Education & Schools

The Local Authority will provide support, guidance and advice on HR and Legal matters as required

5. Protection provided to Whistleblowers

5.1. Victimisation

Provided the Whistleblower is raising a genuine concern, it does not matter if they are mistaken. Of course, the school does not extend this assurance to someone who maliciously raises a matter they know is untrue.

If the Whistleblower has raised a genuine concern under this policy, they will not be at risk of losing their job or suffering any form of reprisal as a result.

The school will not tolerate the harassment or victimisation of anyone raising a genuine concern and will consider it a disciplinary matter to victimise anyone who has raised a genuine concern.

5.2. Confidentiality

With these assurances, we hope that the Whistleblower will raise their concern openly. However, the school recognises that there may be circumstances when they would prefer to speak to someone confidentially in the first instance. If this is the case, they are requested to advise the school of their concern(s) at the outset.

If they ask the school not to disclose their identity, it will not be disclosed without the Whistleblower's consent (unless required by law). The Whistleblower should understand that there may be times when the school is unable to resolve a concern without revealing their identity, for example where personal evidence is essential or in an investigation report to provide context. In such cases, the school will discuss with the Whistleblower whether and how the matter can be best progressed.

Please remember that if the Whistleblower does not identify themselves (and is therefore raising a concern anonymously) it may be difficult for the school to investigate the matter. The school will not be able to protect the position of the Whistleblower or provide feedback, as it can when a Whistleblower's identity is disclosed at the outset.

6. Whistleblowing Procedure

6.1. Steps to follow when raising a concern internally

Please see Appendix 3 for further details relating to the 'Harm Threshold' and 'Low-Level' Concerns

When raising a concern, the Whistleblower does not need to have firm evidence of malpractice. However, the school requests that they explain as fully as they can, the information or circumstances that have given rise to their concern.

If they wish to raise the matter confidentially, they are requested to advise the school of this at the outset, so that appropriate arrangements can be made.

6.2. Step one

If there is a concern about malpractice, the school hopes that the Whistleblower will feel able to raise it first with their line manager or Headteacher. This may be done:

- verbally
- in writing in open correspondence
- using the school's low-level concerns form (Reporting form is Appendix 3 in the Low-Level concerns policy)

6.3. Step two

If they feel unable to raise the matter with their line manager or Headteacher, for whatever reason, they are encouraged to use the school's low-level concerns form and send it to the Chair of Governors.

6.4. Step three

If the Whistleblower feels unable to raise the matter with the Chair of Governors, for whatever reason, they are encouraged to use the school's Confidential Reporting Form and send it to one of the LADO Officers. The contact details for the LADO are available in Appendix 2 of this policy.

These people have been given special responsibility and training for dealing with Whistleblower concerns.

If the Whistleblower feels unable to raise their concerns with the LADO, they can communicate their concerns directly to the Director of Children and Young People, Education & Schools.

6.5 How the school will respond to a Whistleblower concern

The nature of the concern will be evaluated in terms of the 'Harm Threshold' and 'Low-level' concerns criteria (Appendix 3), and this will inform subsequent action and decision making and involvement of the LADO.

Where a concern has been raised under step one or two (above), it will be acknowledged within 5 working days.

The Headteacher or Chair of Governors will:

- write to the Whistleblower acknowledging their concern(s)
- undertake a preliminary investigation

If the Headteacher or Chair of Governors is satisfied that the concern raised requires a formal investigation, which may involve consultation with the LADO, an Investigating Officer will be identified. This would normally be a member of the Senior Leadership Team who is not involved in the substance of the allegation.

The Headteacher or Chair of Governors will write to the Whistleblower to confirm:

- details of the appointed Investigating Officer
- details of how the concern(s) will be investigated

- details of the support mechanisms available to the Whistleblower during the investigation

During the investigation, the Investigating Officer will maintain regular contact with the Whistleblower and, where possible, provide a timetable for the investigation.

At the conclusion of the investigation, a report will be sent to the Headteacher or Chair of Governors, outlining the findings of the investigation and providing any recommendations.

Recommendations are sometimes provided to assist the school in addressing findings that are reported during the investigation.

The Headteacher or Chair of Governors will then write to the Whistleblower with details of his / her findings.

If during the above or following completion of the process the person raising the issue still has concerns that a child or children are at risk or that appropriate procedures have not been followed, the member of staff should contact the LADO or the Safeguarding and Partnership Hub or, in situations where children are thought to be in immediate danger or risk of harm, the Police by contacting 999.

7. Additional Support for Employees

Any employee who raises a concern or is the subject of an investigation under the Whistleblowing Policy can access additional support from the school such as a referral to the school's Occupational Health provider.

8. External Disclosures and Independent Advice

It is the aim of the Whistleblowing Policy to provide the Whistleblower with the reassurance and information that they need to raise their concern internally.

If they would prefer to report the concern(s) externally, they may wish to seek advice from their Trade Union, regulatory or professional body, or from the Whistleblowing charity, 'Protect', which provides legal advice to individuals and employers. What is most important is that the concern is raised and considered.

Protect Advice can be contacted

- by telephone on 020 3117 2520
- by email on whistle@protect-advice.org.uk
- more information about what they do can be found by visiting www.protect@advice.org.uk

9. Department for Education

If you would like to make a Whistleblowing disclosure regarding an academy or post 16 provider you can make a disclosure directly to the Department for Education (DfE) if you are:

- an employee
- a volunteer who has knowledge of the setting – for example if you are a trustee in an academy trust

For more information on how the DFE handle whistleblowing disclosures, please visit: (https://www.gov.uk/government/publications/dfe-whistleblowing-policy).

9.1 What to include in a disclosure

Give full details of the school so it can be fully investigated. Provide the settings full name, address and postcode as without these details they are unable to investigate.

9.2 Schools

To make a disclosure about an academy trust or free school, use:

- the Customer Help Portal (https://customerhelpportal.education.gov.uk/) if you agree to disclosing your identity.
- your complain about a school (https://www.gov.uk/complain-about-school) guidance if you wish to remain anonymous.

9.3 Colleges and independent training providers

Make a disclosure about a post-16 education or training provider by: emailing your complaints or disclosure to customer.complaints@education.gov.uk

Alternatively, sending a letter to:

- Customer Service Team
  Department for Education
  Cheylesmore House
  Quinton Road
  Coventry
  CV1 2WT

9.4 What happens after making a disclosure

Once the DFE receive a disclosure they will:

- send an acknowledgement (if you shared your contact details)
- confirm that we will not contact you unless we need further information for any investigation

The DFE will not enter a conversation with reporting person once they have started a formal investigation.

10. Commitment to Equality

This policy addresses the following equality duties:

- to eliminate unlawful discrimination, harassment, and victimisation
- to advance equality of opportunity
- to foster good relations between different groups of people

11. Other Related Policies

- Low-level Concerns
- Complaints
- Strategic Child Protection and Safeguarding
- Staff Reference Guide Child Protection and Safeguarding
- Staff Code of Conduct

Appendix 1 - Key policies

Policy / Document	Location / Where to find the document
Whistleblowing Policy (Schools) Autumn 2026	Google Drive, Shared Drives, aStaff Information 2026-2027, KCSiE and Wider Key Policies.
Keeping Children Safe in Education DfE Sept 2026	Google Drive, Shared Drives, aStaff Information 2026-2027, KCSiE and Wider Key Policies.
School Staff Code of Conduct Autumn 2026	Google Drive, Shared Drives, aStaff Information 2026-2027, KCSiE and Wider Key Policies.
Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings 2022	Google Drive, Shared Drives, aStaff Information 2026-2027, KCSiE and Wider Key Policies.
School Strategic Child Protection and Safeguarding Policy 2026	Google Drive, Shared Drives, aStaff Information 2026-2027, KCSiE and Wider Key Policies.
Low-level Concerns Policy 2026	Google Drive, Shared Drives, aStaff Information 2026-2027, KCSiE and Wider Key Policies.

Appendix 2 - Key Contacts	
Name / Role	Contact Details
Headteacher	**Sarah Bone** Sarah.bone@headlandsschool.co.uk
Chair of Governors	**Phillipa Gascoigne** phillipa.gascoigne@headlandsschool.co.uk **or** Headlands.governors@headlandsschool.co.uk
Local Authority Designated Officer (Jayne Hammill and Lisa Breene)	LADO@eastriding.gov.uk
Safeguarding and Partnership Hub (SaPH)	**Mon to Thu** 8:30am-5:00pm **Fri** 8:30am-4:30pm (01482) 395500 www.eastriding.gov.uk/living/children-and-families/childrens-social-care/support-and-protection-for-children/
Safeguarding in Education Team	safeguardingineducation@eastriding.gov.uk - Chris Hamling (Education Safeguarding Manager) - Tahnee Burgess (Education Safeguarding Officer) - Fiona O'Hara (Education Safeguarding Officer) - Tara Baker (Education Safeguarding Officer) - Kate Jordan (Education Safeguarding Officer) - Eve Atkinson (Education Safeguarding Support Assistant)
ER Emergency Duty Team – out of hours	(01482) 393939
Protect (Independent whistleblowing charity)	Helpline: (020) 3117 2520 E-mail: whistle@protect-advice.org.uk Website: www.protect-advice.org.uk
NSPCC	0800 028 0285 Email: help@nspcc.org.uk Website: www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/
Employee's Trade Union	Employee to contact their own Trade Union

Appendix 3 – harm threshold and low-level concerns

Harm Threshold

The term 'allegation of harm' means that it is alleged that a person who works with children meets the harm threshold as specified below and has:

- behaved in a way that has harmed a child or may have harmed a child; and / or
- possibly committed a criminal offence against or related to a child; and / or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and / or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

Staff should follow the procedures outlined in the supporting school policies, Staff Code of Conduct and Whistle-blowing Policy in the event of concerns being identified relating to the conduct of adult colleagues

What is a low-level concern?
The term 'Low-level' concern does not mean that it is insignificant; it means that the adult's behaviour towards a child does not meet the harm threshold as set out in Section 3 of the Low-Level concerns policy. A Low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:

- is inconsistent with an organisation's Staff Code of Conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating students.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.