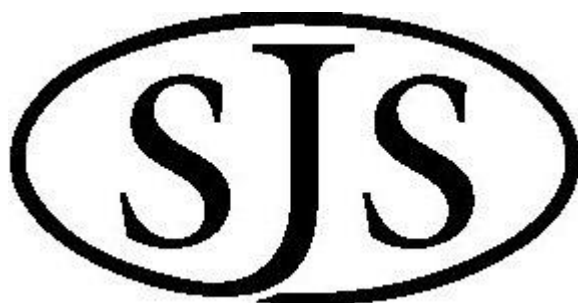


Shaftesbury Junior School

Whistle Blowing Policy



'We care, we share, for the future we prepare'

Approved by: Full Governing Body

Date: 9th December 2025

Last reviewed on: December 2025

Next review due by: December 2026

This policy reflects requirements for inclusion and equality as set out in the [Special Educational Needs and Disability Code of Practice 2014](#) and [Equality Act 2010](#), and refers to curriculum-related expectations of governing boards set out in the Department for Education's [Governance Handbook](#).

We support the 'City of Sanctuary' vision that the UK will be a welcoming place of safety for all and proud to offer sanctuary to people fleeing violence and persecution. We endorse the City of Sanctuary Charter, and agree to act in accordance with City of Sanctuary values and apply the network principles within our work.

We recognize the contribution of people seeking sanctuary. Sanctuary seekers are welcomed, included and supported within our context.

Statement of intent

Shaftesbury Junior School is committed to high standards of conduct and to compliance with legal obligations and good practice. It wants malpractice to be pointed out and dealt with and expects its employees, and others who help to deliver its services, to help with that.

Aims & Objectives

This policy encourages employees to raise genuine concerns as “whistleblowers”, and provides a procedure for doing so. It explains how those who make public interest disclosures reasonably and in good faith will be protected from detriment such as victimisation or discipline. Often, that involves treating the disclosure confidentially, including protecting the whistleblower’s identity.

Who is Protected by the Policy?

You are protected if you work for the school as:

- An employee
- An agency employee
- A trainee

The policy does NOT apply to raising grievances about an employee’s personal situation and thus, does not replace existing procedures for personal differences or conflicts. If you have concerns in this area you should consult the Council’s Grievance Policy or your immediate manager.

What Kind of Disclosures are Covered?

Whistle-blowing involves a disclosure which tends to show one or more of the following:

- A criminal act has been, is being or is likely to be committed
- Someone has failed, is failing or is likely to fail to comply with legal obligations
- Health and safety risks, including risks to the public as well as to other employees
- Damage to the environment
- The unauthorised use of public funds
- Possible fraud and corruption
- Inappropriate or improper conduct
- Serious failure to comply with appropriate professional standards
- Breach of Council or statutory codes of practice or the Council’s standing orders
- Abuse of children and vulnerable adults
- Other unethical conduct

What is Expected of the Whistleblower?

If you make a disclosure to the Headteacher, you are expected to:

- Make the disclosure in good faith; and
- Have a reasonable suspicion about the malpractice; and
- Reasonably believe that your information, and any allegation in it, is true; and
- Not make the disclosure for personal gain

The conditions for outside disclosures are one or more of the following to apply:

- You reasonably believe you would suffer detriment if you made the disclosure to the Council or to a regulator; or
- None of the regulators covers the matter and you reasonably believe the evidence is likely to be concealed or destroyed; or
- You have already made the disclosure to the Headteacher

How is the Whistleblower Protected?

If you act in good faith and comply with the expectations of this policy, you will be protected from any detriment as a result of making a disclosure. In particular, you will be protected from harassment or victimisation.

If you want your identity to remain confidential, this will be observed as far as possible. Should it not be possible to resolve a concern without revealing your identity (for example, because your evidence is needed in court or in a subsequent internal disciplinary hearing), we will discuss with you whether we should take the matter forward at all and if so, how we will do so. We will also discuss with you how best to protect your interests.

Anonymous disclosures will be considered to the extent that it is reasonable and practicable to do so. Anonymous allegations are often difficult to consider due to the need to confirm or follow up evidence.

Failure to comply with the expectations of this policy, including, making a frivolous or malicious disclosures may result in disciplinary action being taken.

Procedure for Dealing with a Disclosure

Disclosures will be dealt with under the following stages, shown in Appendix A. Not all disclosures will follow the full sequence of Stages, subject to the particular circumstances of each case.

Responsibility for this Policy

The Headteacher is responsible for keeping this policy up-to-date and for overseeing how it is operated. This includes:

- Confirming representatives who will be responsible for actions as outlined in the policy
- Ensuring records of all disclosures are made and their outcomes recorded
- Reporting as appropriate and necessary to relevant governors

There is also a duty on you to inform your manager if you acquire a conviction during the course of your employment.

Appendix A

Stage 1 – Informal Resolution

If an individual is aware or concerned about misconduct taking place inside the school that he or she thinks may damage or undermine the interests of the wider public they are advised in the first instance to share the details with their line manager to see if it can be resolved without a formal procedure. This may be done orally or in writing.

When making a disclosure, give as much information as possible about:

- The nature of the problem
- The background (with dates if possible)
- Who is involved
- The reasons you are concerned

The Headteacher should decide on the basis of the information so provided, whether the matter can be resolved informally and either:

- Explain how the matter can be resolved; or
- Refer the matter for formal consideration; or
- Advise the individual that they may raise it formally.

If the individual is unable to raise the matter with his or her line manager they are advised to speak to Human Resources who should consider whether the matter can be resolved informally as set out above or referred for formal consideration as detailed below.

Stage 2 – Formal Disclosure

If the individual feels unable to discuss their concerns with any of the above, or does not accept that the response at the informal stage is sufficient, they can make a formal disclosure by contacting the Investigations Team as follows:

Phone: 0116 2527415 (24 hrs)

Write to:

The Corporate Counter Fraud Team
Internal Audit
3rd Floor Phoenix House
1 King Street
Leicester
LE1 6ZG

E-mail: investigations@leicester.gov.uk

At this stage, the person making the disclosure or 'Whistleblower', will be asked whether he or she wishes their identity to be disclosed and will be reassured with regard to protection from possible reprisals or victimisation.

He or she may also be asked to consider making a written or verbal statement. In such cases, a brief summary of the interview will be made which will be agreed by both parties.

Details of the disclosure will be presented for the consideration of the Monitoring Officer or his representative, including recommendations for any further action.

Stage 3 – Initial Response to a Formal Disclosure

The Headteacher or representative will take any necessary urgent action and then decide how to respond to the disclosure, having regard to all the circumstances, including the evidence available. Preliminary inquiries

may be made to help decide how best to respond in the public interest. Depending on the nature of the issue raised, the response may be one or more of the following:

- A management investigation
- An internal audit investigation
- A disciplinary investigation
- A referral for consideration under another Council procedure
- Referral to the police
- Referral to the District Auditor
- An independent investigation
- Amend procedures
- Take no action for lack of sufficient evidence

The Whistleblower will be notified of the intended response to his or her disclosure and the reasons for it.

Stage 4 – Management Investigation

Where the decision has been made to carry out a Management Investigation, a senior manager will be appointed as an investigating officer. He or she will agree terms of reference with the Monitoring Officer or representative and identify a date by when the investigation will be completed.

The investigation may need to be carried out under the strictest confidentiality. The investigation is essentially a 'fact finding' exercise, to establish what further action may be necessary and make recommendations accordingly. The Investigating Officer will have regard to the human rights of any individuals affected by the investigation. The investigation may serve as the information gathering part of the Council's disciplinary procedure. In such cases this will be made clear to any people who may be subject to such investigation and the usual right to be represented will be made clear.

Stage 5 – Responding to Management Investigation

The Headteacher or representative will decide whether any further action is necessary as a result of the investigation report and recommendations. If the result of the investigation is that there is a case to be answered by any individual, the recognised procedure will be followed.

Where there is no case to answer, but the Whistleblower held a genuine concern and acted in accordance with this policy, the school will ensure that they suffer no reprisals or victimisation, as far as is reasonably practicable.

Where it is established that false allegations have been made and the Whistleblower has not acted in accordance with this policy, disciplinary actions may be taken against the Whistleblower.

Stage 6 – Confirmation of the Outcome

So far as legally possible and subject to rights of confidentiality, the Whistleblower will be informed of the outcome of the investigation and how the matter has been resolved. If he or she is dissatisfied with this response the Whistleblower may take the matter further with the prescribed persons or organisations where justified under this procedure.