Castle School
Together We Learn

Whistleblowing Policy and Procedure

September 2026

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This policy is a school-specific adaptation of the EPM model policy.

Contents

1. Purpose
2. Background
3. Aims and scope of the policy
4. Safeguards
5. How to raise a concern
6. The role of senior managers
7. Raising concerns outside the school
8. Monitoring and review

1. Purpose

This policy sets out Castle School Governing Body's policy and procedure for dealing with concerns raised by employees and others working for or on behalf of the school which relate to suspected wrongdoing or dangers at work.

Allegations of child abuse or concerns about the conduct of teachers, other staff or volunteers must be dealt with in accordance with the school's safeguarding and child protection procedures and the current statutory guidance Keeping Children Safe in Education.

2. Background

Employees are often the first to realise that there may be something wrong within a school. It is therefore important that they feel able to express concerns without fear of harassment, victimisation or other detriment. The Public Interest Disclosure Act 1998 provides legal protection for workers who make certain disclosures of information in the public interest.

This policy also reflects the changes introduced by the Employment Rights Act 2025 which, from 6 April 2026, expressly include disclosures about sexual harassment as protected whistleblowing disclosures.

Castle School Governing Body is committed to the highest possible standards of operation, probity and accountability. Employees, officers, consultants, contractors, volunteers, casual workers and agency workers with serious concerns are encouraged to come forward and raise them. The intention is to enable concerns to be raised within the school, wherever appropriate, rather than being ignored or left unresolved.

This policy does not form part of any employee's contract of employment and may be amended from time to time.

3. Aims and scope of the policy

The policy aims to:

- ✓ provide clear routes for concerns to be raised internally and for feedback to be given on action taken;
- ✓ ensure concerns are dealt with promptly, appropriately, consistently and fairly;
- ✓ reassure those raising genuine concerns that they will be protected from reprisals or victimisation; and
- ✓ allow a concern to be taken further where the person raising it is dissatisfied with the school's response.

3.1 What is whistleblowing?

A whistleblower is a person who raises a genuine concern about suspected wrongdoing or danger affecting the school's activities. Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work.

This may include:

- criminal activity;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- failure to comply with any legal or professional obligation or regulatory requirement;
- bribery;
- financial fraud or mismanagement;
- negligence;
- breach of the school's internal policies and procedures;
- conduct likely to damage the school's reputation;
- unauthorised disclosure of confidential information;
- public examination fraud;
- concerns relating to sexual harassment, whether past, ongoing or likely to occur; and
- the deliberate concealment of any of the above matters.

3.2 Matters that should normally be raised under another procedure

Whistleblowing is not a substitute for normal day-to-day management arrangements or for procedures designed to deal with individual employment concerns. Staff should use line management, team meetings and other appropriate opportunities to seek clarification and raise routine concerns.

Complaints about an employee's own personal circumstances, such as general concerns about how they have been treated at work, should normally be raised under the school's Grievance Procedure or anti-harassment and bullying

arrangements, as appropriate. Concerns about salary should normally be raised through the salary review arrangements in the school's Pay Policy.

However, concerns relating to sexual harassment which an employee reasonably believes amount to a matter of public interest may constitute a protected disclosure and may be raised under this policy.

4. Safeguards

4.1 Harassment or victimisation

The Governing Body recognises that the decision to report a concern can be difficult, particularly where there is a fear of reprisal. Castle School will not tolerate harassment, victimisation or detrimental treatment of a person who raises a genuine concern under this policy and will take appropriate action to protect them.

Where a person raising a concern is already subject to another internal process, such as a disciplinary, capability or redundancy process, that process will not automatically be suspended simply because a whistleblowing concern has been raised.

4.2 Confidentiality

Castle School hopes that staff and others working for the school will feel able to raise concerns openly. Where confidentiality is requested, the school will make every reasonable effort to protect the identity of the person raising the concern.

There may be circumstances where an effective investigation cannot be carried out without identifying the source of the information. Where this becomes necessary, the matter will be discussed with the person concerned before their identity is disclosed wherever reasonably practicable.

Disclosures relating to sexual harassment may require heightened sensitivity. Confidentiality will be prioritised wherever reasonably practicable.

4.3 Anonymous allegations

Individuals are encouraged to put their name to an allegation. Proper investigation can be more difficult where the school is unable to obtain further information or test the credibility of an allegation. Anonymous allegations will nevertheless be considered at the discretion of the Governing Body.

In deciding how to respond to an anonymous allegation, the school will consider:

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

4.4 False, malicious or vexatious allegations

If a person raises an allegation because they genuinely believe it to be true, but the allegation is not confirmed by investigation, no action will be taken against them. If, however, the school concludes that an employee has knowingly made a malicious or vexatious allegation, or has raised an allegation for personal gain, disciplinary action may be considered.

4.5 Unfounded allegations

Where an investigation concludes that an allegation is unfounded, the person who raised the concern will be informed, subject to any confidentiality restrictions. The matter will normally then be treated as concluded unless new evidence becomes available.

4.6 Support

Castle School recognises that raising or being the subject of a whistleblowing concern can be difficult and stressful. Appropriate advice and support will be made available, where possible, to the person raising the concern and to any person who is the subject of an investigation.

5. How to raise a concern

As a first step, a concern should normally be raised with the individual's immediate manager or that manager's senior manager. The appropriate person will depend on the seriousness and sensitivity of the matter and on who may be involved.

If the concern involves the person's immediate manager or their senior manager, it should be raised with the Headteacher. If the concern involves the Headteacher, it should be raised with the Chair of Governors. Where an employee, including the Headteacher or a member of the leadership team, believes that the overall management and/or Governing Body is engaged in an improper course of action, they may bypass the normal internal route and use the external routes set out in section 7.

Concerns are best raised in writing. The person raising the concern should set out the background and history, including names, dates and places where possible, and explain why they are concerned. If they do not feel able to put the concern in writing, they may raise it by telephone or in person.

However the concern is raised, the individual should make clear that they are raising the issue under the Whistleblowing Policy.

The earlier a concern is raised, the easier it is for the school to take appropriate action. A whistleblower is not expected to prove the truth of an allegation, but they should be able to explain the grounds for their concern.

In some circumstances, it may be appropriate for an employee to ask their recognised trade union to raise a matter on their behalf.

At any meeting under this policy, an employee may be accompanied by a workplace colleague or trade union representative. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

6. The role of senior managers

A senior manager who is informed that an individual is raising a concern under the Whistleblowing Policy must treat the matter seriously and respond promptly.

6.1 Stage One - initial consideration

The senior manager should arrange to meet the person raising the concern as soon as reasonably possible and establish:

- ✓ whether there appears to be genuine cause and sufficient grounds for the concern; and
- ✓ whether the concern has been appropriately raised under this policy.

If the concern has not already been put in writing, the senior manager should ask for a written account. If the individual is unable to provide one, the senior manager should prepare a written summary and provide a copy to them.

The written account or notes should make clear that the issue is being raised under the Whistleblowing Policy and should include, so far as possible:

- ✓ the background and history of the concern;
- ✓ names, dates and places; and
- ✓ the reasons why the individual is particularly concerned.

The person raising the concern should be invited to date and sign their written account or the manager's notes. This can be particularly important where the notes may later form evidence in another process.

The senior manager should explain:

- ✓ who they may need to speak to in order to determine next steps, for example the Headteacher or Chair of Governors;
- ✓ what initial steps they intend to take;
- ✓ how communication will be maintained during and at the end of the process;
- ✓ that confidentiality may prevent the school from providing detailed information about an investigation or any disciplinary action arising from it;
- ✓ that a written response will be provided within ten working days;



- ✓ that the person's identity will be protected as far as reasonably possible, subject to the needs of a fair and effective investigation;
- ✓ that the Governing Body will take reasonable steps to protect them from discrimination, victimisation or detriment;
- ✓ that the matter will be taken seriously and considered promptly;
- ✓ that no punitive action will be taken simply because a genuine concern is not substantiated;
- ✓ that malicious or vexatious allegations may lead to disciplinary action; and
- ✓ that an investigation may conclude that an allegation is unfounded, in which case the matter will normally be treated as concluded unless new evidence emerges.

6.2 Stage Two - deciding the appropriate response

Following the initial meeting, the senior manager should consult with the Headteacher or Chair of Governors, as appropriate, to decide whether an investigation is required and, if so, what form it should take. A written record should be made of the decisions and agreed actions.

Where an allegation is anonymous, the school will consider whether further action is possible by taking account of the seriousness of the issue, the credibility of the concern and the likelihood of confirming the allegation from attributable sources.

Some concerns may be resolved through agreed action or explanation without a formal investigation. Depending on the nature of the concern, it may instead be necessary to:

- investigate the matter internally;
- refer the matter to the police;
- refer the matter to the external auditor; or
- commission an independent inquiry.

Senior managers must remain alert to other school procedures which may need to operate alongside or instead of this policy, including safeguarding, allegations

against staff, disciplinary, grievance, anti-harassment, health and safety and complaints procedures.

6.3 Stage Three - written response

Within ten working days of receiving a whistleblowing concern, the manager who received it must write to the person who raised it, so far as confidentiality permits, to:

- ✓ acknowledge that the concern has been received;
- ✓ indicate how the school proposes to deal with the matter;
- ✓ give an estimate of how long it may take to provide a final response;
- ✓ confirm whether any initial enquiries have been made;
- ✓ confirm whether further investigations will take place and, if not, explain why; and
- ✓ state when the individual can expect a further update if the matter has not yet been resolved.

7. Raising concerns outside the school

The purpose of this policy is to provide an internal mechanism for reporting, investigating and remedying wrongdoing in the workplace. In most cases, it should not be necessary to alert an external body. The law recognises, however, that in some circumstances it may be appropriate to report concerns to a regulator or other prescribed body.

It will very rarely, if ever, be appropriate to alert the media. Anyone considering an external disclosure is strongly encouraged to obtain advice first.

If a person is not satisfied with the Governing Body's response, they may consider raising the matter with an appropriate external body, including:

- → Protect* - 0203 117 2520;
- → a recognised trade union;
- → the Department for Education (DfE);
- → an appropriate senior officer of Cambridgeshire County Council / the Service Director for Education;
- → the school's external auditor;
- → a relevant professional body or regulator; or
- → a solicitor.

Anyone taking a concern outside the school remains responsible for ensuring that confidential information is not inappropriately disclosed to a third party.

**Protect is a registered charity which provides confidential advice about whistleblowing and speaking up at work.*

7.1 Safeguarding concerns

Concerns about safeguarding practice may be raised externally with the Local Authority Designated Officer (LADO) or through the NSPCC whistleblowing advice line.

LADO by phone 0345 045 5203 or email LADO@cambridgshire.gov.uk

NSPCC whistleblowing helpline as 0800 028 0285 and help@nspcc.org.uk.

Employees may also refer to the Department for Education's whistleblowing guidance for employees for further information about raising concerns.

8. Monitoring and review

Records of whistleblowing concerns and the action taken will be retained securely in accordance with data protection, employment and safeguarding requirements. The school utilised the MyConfide System where appropriate and the use of Electronic and Paper HR files for staff to retain information of this nature. A decision about the most suitable place for retention will be made by the Headteacher.

The Headteacher is responsible for monitoring the implementation and effectiveness of this policy and procedure. The Governing Body (delegated to The Resources Committee) will review the policy as necessary and at least in line with the school's agreed review schedule.