



Disclosure (Whistleblowing) Policy

Key Document Details

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Version	Date	Page document	Change	Origin of change e.g. Change in legislation, Policy review.
5.0	November 2024		<p>4.2 Addition of contact email address to contact Director of People whistleblowing@twhf.org.uk</p> <p>4.3 Removal of phone contact for whistle blowing paragraph Addition of the following paragraph in its place. Confidential disclosures. Should you wish to make your disclosure anonymously, please either use a private email address that is not identifiable or set up an anonymous email address, for example using a domain such as Gmail or similar to submit your disclosure.</p>	<p>Policy Review</p> <p>This phone number is no longer available</p>
6.0	April 2026	All	<p>Improved layout to support printing and rebranded.</p> <p>New clause added addressing sexual harassment.</p>	<p>DfE best practice.</p> <p>Reflecting current statutory requirements</p>

Section 1 – Introduction

Employees are often the first to realise that there may be something seriously wrong within the school or Federation. However, they may not express concerns because they feel that speaking up would be disloyal to their colleagues or to the school. 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.

The White Horse Federation is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we encourage employees and others with serious concerns about any aspect of the school or federation’s work to come forward and voice those concerns. It is recognised that certain cases will have to proceed on a confidential basis. This policy document makes it clear that staff can do so without fear of reprisals. This Whistleblowing Policy is intended to encourage and enable staff to raise serious concerns within the school rather than overlooking a problem or blowing the whistle outside.

This Whistleblowing Policy has been devised in accordance with the provisions of the Public Interest Disclosure Act 1998, the Enterprise and Regulatory Reform Act 2013 and the British Standard Institute Code of Practice regarding Whistleblowing arrangements, and seeks to bring into the open concerns of the staff and public relating to issues concerning dishonesty involving the school.

It is intended to encourage and enable employees to raise serious concerns within the school, irrespective of seniority, rank or status, rather than overlooking a problem or reporting the matter externally.

Section 2 – Aims and Scope of the Policy

This policy aims to:

- Provide avenues for staff to raise concerns and receive feedback on any action taken;
- Allow staff to take the matter further if they are dissatisfied with the school's response; and
- Reassure staff that they will be protected from reprisals or victimisation for whistleblowing in good faith.

There are existing procedures in place to enable staff to lodge a grievance relating to their own employment for example in relation to areas such as terms and conditions of employment; health and safety; work relations; new working practices; working environment and conditions; workload; organisational change, etc. This Whistleblowing Policy is intended to cover concerns that fall outside the scope of that procedure.

That concern may be about something that:

- Is unlawful
- Is contrary to the Federation or School's Standing Orders or policies
- Falls below established standards or practice; or
- Amounts to improper conduct

For example (this list is not exhaustive):

- Malpractice or ill treatment of a client/customer
- A criminal offence has been committed, is being committed or is likely to be committed
- Suspected fraud
- Suspected bribery
- Abuse of a child or adult
- A disclosure that sexual harassment has occurred, is occurring or is likely to occur.
- Abuse of personal budgets/client accounts
- Disregard for legislation, particularly in relation to health and safety at work
- Breach of Financial Regulations, Standing Orders
- Showing undue favour over a contractual matter or to a job applicant
- A breach of any code of conduct or protocol
- Damage to the environment
- Information on any of the above has been, is being, or is likely to be concealed.

The overriding concern should be that it would be in the public interest for the malpractice to be corrected and, if appropriate, sanctions applied. Staff will be encouraged to explain the public interest they are concerned with. In order to qualify for protection, a whistle-blower must have a reasonable belief that the relevant disclosure is in the public interest. The Public Disclosure Act makes it unlawful for the school to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act. Even if the disclosure is considered not to be in the public interest then it will still be investigated if considered appropriate by the Monitoring Officer (Director of HR).

Managers should ensure that this policy is made available to staff of contractors, consultants and suppliers working for or on behalf of the school, on school premises or elsewhere.

Section 3 – Safeguards

Harassment or Victimisation

The school recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The federation will not tolerate harassment or victimisation and will take action to protect staff when they raise a concern in good faith. The federation will treat any harassment or victimisation as a serious disciplinary offence to be dealt with under the Disciplinary Procedure.

This does not mean that if staff are already the subject of disciplinary or redundancy procedures, that those procedures will be halted as a result of their whistleblowing.

Confidentiality

The federation will do its best to protect a staff member's identity when they raise a concern and do not want their name to be disclosed. It must be appreciated that the investigation process may reveal the source of the information and a statement by staff may be required as part of the evidence.

Anonymous Allegations

This policy encourages staff to put their name to their allegation. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of the federation.

In exercising the discretion, the factors to be taken into account would include the:

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

Untrue Allegations

If staff make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, staff make malicious or vexatious allegations, disciplinary action may be taken against them.

Section 4 – How to raise a concern

Employees who raise concerns that fall within the scope of other federation procedures will not be dealt with in this procedure, but will be advised on the appropriate procedure to use. Such employees will still receive protection as detailed in this policy.

As a first step, staff should normally raise concerns with their immediate manager or supervisor as soon as the employee has reasonable suspicion. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. If in doubt, contact the Principal, Chair of Governors or the Director of HR (the Federation's Monitoring Officer).

Alternatively, staff can email their concerns to whistleblowing@twhf.org.uk

Concerns are better raised in writing. Staff are invited to set out the background and history of their concern, giving names, dates and places where possible, and the reason why they are particularly concerned about the situation. If staff do not feel able to put their concern in writing, they can meet the appropriate officer. The earlier staff express the concern the easier it is to take action.

Although staff are not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for the concern and evidence that the concern is in the public interest.

Advice and guidance on matters of concern can be obtained from:

- Principal
- Director of HR (Monitoring Officer)
- HR Business Partner
- NSPCC helpline for professionals to raise concerns about how child protection issues are being handled in their own or other organisations (telephone: 0800 028 0285)
- Ofsted's dedicated whistleblowing number: 0300 1233155
- Confidential advice and guidance from an independent organisation can be obtained from Public Concern at Work (telephone: 020 7404 6609)
- Chief Executive Officer.
- any of those listed in paragraph 6.1 below

Staff may invite a trade union representative or work colleague to raise a matter on their behalf.

Section 5 – How the Trust will respond

The action taken by the Trust will depend on the nature of the concern and may:

- be resolved by agreed action without the need for investigation;
- be referred for internal investigation;
- be referred to the Police;
- be referred to the external auditor;
- form the subject of an independent inquiry

In order to protect individuals, the school and the Federation, initial enquiries will be forwarded to the Principal who will consult with the Director of HR and decide whether an investigation is appropriate and, if so, what form it should take. The Responsible Monitoring Officer can decide to take no further action if a complaint appears to be trivial or vexatious. All such decisions will be reported to the next meeting of Trust Board. Concerns or allegations that fall within the scope of specific existing school or Federation procedures, for example discrimination issues, will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation and staff will be involved in those discussions. The Responsible Monitoring Officer shall report periodically thereon to the Trust Board.

If an investigation is required, the Principal, will consult with the Director of HR and designate an appropriate officer to investigate the concern. Following this that officer will, within ten working days, write to the member of staff:

- Acknowledging that an investigation will be carried out
- Indicating how he/she proposes to deal with the matter
- Giving an estimate of how long it will take to provide a final response
- Telling them whether any initial enquiries have been made
- Telling them whether further investigations will take place, and if not, why not
- Advising them that any investigation will be carried out in the strictest confidence; and
- Keeping them informed of the progress of the investigation.

The amount of contact between the 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.

When any meeting is arranged, staff have the right, if they so wish, to be accompanied by a union representative or work colleague who is not involved in the area of work to which the concern relates.

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

The Responsible Monitoring Officer will report on the outcome of any investigation to the Trust Board who will monitor the implementation of the recommendation of the investigation.

Section 6 – How the matter can be taken further

This policy is intended to provide staff with an avenue to raise concerns within the school and wider Federation. The school hopes staff will be satisfied. If they are not, and feel that it is right to take the matter outside the school or wider Federation, the following are possible contact points:

- Chair or any member of the Trust Board
- The External Auditor (Bishops Fleming: tel. no. 01225486300 (FAO Simon Morrison)
- Relevant professional bodies or regulatory organisations
- Solicitor
- The Police
- NSPCC helpline to raise a concern about how child protection issues are being handled 0800 028 0285
- Ofsted's Whistleblowing Hotline 0300 1233155

- Public Concern at Work (tel. no. 020 7404 6609). If staff do take this matter outside the Federation, they need to ensure that they do not disclose confidential information or that disclosure would be privileged. Staff should check with the contact point about that.

Section 7 – Relationship with other School/Federation Policies

This policy should be read in conjunction with the Federations’s Anti-Fraud and Bribery Policy, the Disciplinary Procedure, the Code of Conduct and other relevant policies.

Section 8 – The Monitoring Officer

The Monitoring Officer has overall responsibility for the maintenance and operation of this policy, and will liaise as necessary with the Chief Executive Officer and Chair of Trust Board.

The Monitoring Officer maintains a record of concerns raised and the outcomes (but in a form which does not endanger staff confidentiality) and will report as necessary to the Trust Board.