

Harewood Junior School

Whistleblowing Policy



Approved by:	Date: 26.09.2026
Last reviewed on:	New Policy – previously embedded into Communication Policy
Next review due by:	September 2027
Person responsible:	Headteacher

1. Purpose

Harewood Junior School is committed to maintaining the highest standards of integrity, safeguarding, professionalism and accountability.

The school recognises that employees and other staff may sometimes become aware of concerns about:

- safeguarding or child protection;
- inappropriate or unsafe behaviour;
- malpractice or misconduct;
- breaches of legal or regulatory requirements;
- fraud, corruption or financial wrongdoing;
- serious health and safety risks;
- misuse of school resources;
- deliberate concealment of wrongdoing;
- failures to follow safeguarding or other statutory procedures;
- serious failures in leadership or governance;
- discrimination, harassment or victimisation;
- any other serious wrongdoing or risk affecting pupils, staff, the school or the wider community.

The purpose of this policy is to provide a safe, clear and confidential route for concerns to be raised and appropriately addressed.

The school encourages individuals to raise concerns at the earliest opportunity rather than allowing problems to continue or escalate.

2. Policy principles

The school is committed to the following principles:

- Concerns will be taken seriously.
- Individuals will not be victimised for raising genuine concerns.
- Concerns will be handled as confidentially as reasonably possible.
- Individuals do not need to prove that wrongdoing has occurred before raising a concern.
- The school will assess concerns objectively and determine the appropriate response.
- Safeguarding concerns will be prioritised and dealt with under the appropriate safeguarding procedure.
- Anonymous concerns will be considered wherever possible.
- Deliberately false or malicious allegations may be dealt with under the school's appropriate disciplinary procedures.
- No person should investigate a concern involving themselves or someone for whom they are responsible.
- Where internal reporting is inappropriate or has not resolved the concern, appropriate external reporting routes may be available.

3. Scope

This policy applies to:

- employees;
- teachers;
- teaching assistants and support staff;
- supply and agency staff;
- temporary staff;
- volunteers;

- trainees and apprentices;
- contractors and consultants;
- governors where appropriate;
- other individuals working for or on behalf of the school.

For the purposes of this policy, these individuals are collectively referred to as **staff**.

This policy does not replace:

- the school's Complaints Policy;
- Child Protection and Safeguarding Policy;
- Low-Level Concerns Policy;
- Allegations Against Staff Procedure;
- Grievance Procedure;
- Disciplinary Procedure;
- Staff Code of Conduct.

The appropriate procedure will depend on the nature of the concern.

4. What is whistleblowing?

Whistleblowing occurs when a worker raises a concern about wrongdoing, risk or malpractice that affects others or the organisation.

A whistleblowing concern will generally relate to matters in the public interest rather than simply a personal employment dispute.

Examples may include concerns that:

- safeguarding procedures are routinely ignored;
- serious concerns about an adult's behaviour towards children are being concealed or inadequately addressed;
- serious financial irregularities are taking place;
- the school is deliberately breaching legal requirements;
- serious health and safety risks are not being addressed;
- records are being falsified;
- evidence is being deliberately destroyed or concealed;
- senior staff are preventing legitimate safeguarding concerns from being reported;
- a person is being instructed to act unlawfully;
- serious wrongdoing is being covered up.

This list is not exhaustive.

5. Whistleblowing and low-level concerns

Whistleblowing and low-level concerns are related but **not the same process**.

The school's **Low-Level Concerns Policy** should normally be used when an individual wishes to report concerning behaviour by an adult working in or on behalf of the school that may be

inconsistent with the Staff Code of Conduct or professional expectations but does not appear to meet the harm threshold.

However, whistleblowing may become appropriate where an individual believes that:

- low-level concerns are repeatedly ignored;
- a pattern of concerning behaviour is not being recognised;
- safeguarding concerns are being suppressed;
- appropriate action is not being taken;
- records are being deliberately withheld or altered;
- senior staff are preventing concerns from being escalated;
- the school's safeguarding arrangements are failing seriously or systematically.

A worker does **not** need to wait until a concern has been classified as a low-level concern before raising a whistleblowing concern.

6. Whistleblowing and safeguarding

Safeguarding concerns require particular care.

If a worker believes that a child:

- is at immediate risk of harm;
- may have suffered harm;
- may be at risk from an adult working in or on behalf of the school;

the concern should be reported immediately using the school's safeguarding arrangements.

The school's **Child Protection and Safeguarding Policy** and **Allegations Against Staff Procedure** take priority where the concern may meet the relevant safeguarding threshold.

A worker should not attempt to investigate a safeguarding concern themselves.

If the worker believes that the school's normal safeguarding route is inappropriate, compromised or has failed to respond appropriately, they should use the escalation arrangements in this policy and/or seek appropriate external safeguarding advice.

7. Who can raise a concern?

Any worker covered by this policy may raise a concern.

A person does not need to be certain that wrongdoing has occurred.

A reasonable and genuine concern is sufficient.

The person raising the concern should provide as much factual information as possible and should avoid investigating the matter themselves.

8. How to raise a concern

Concerns should normally be raised with:

Headteacher:

Name: L Lennox

Contact: office@harewoodjunior.co.uk

Chair of Governors:

Name: A Maunder

Contact: amaunder.governor@harewoodjunior.co.uk

Designated Safeguarding Lead:

Name: L Lennox/ L Kidd/ A Fogg

Contact: office@harewoodjunior.co.uk

Where possible, concerns should be raised promptly.

Concerns may initially be raised verbally, but the school may ask the individual to provide written information so that an accurate record can be maintained.

9. If the concern involves the Headteacher

If the concern relates to the Headteacher, it should **not** be reported to the Headteacher.

The concern should be raised with:

Chair of Governors:

Andrew Maunder (amaunder.governor@harewoodjunior.co.uk)

or another person identified in the school's governance arrangements.

The Chair of Governors will determine the appropriate route for handling the concern and will seek external advice where necessary.

10. If the concern involves the Chair of Governors

Where a concern relates to the Chair of Governors, the worker should report it to:

Vice Chair of Governors:

Name: _____

Contact: _____

Appropriate independent or external advice should be sought where necessary.

11. If the concern involves the DSL

Where the concern relates to the Designated Safeguarding Lead, it should be reported to the Designated Safeguarding Lead or the alternative safeguarding lead identified within the school's safeguarding arrangements.

Where the Headteacher is also implicated, the concern should be escalated through the governance arrangements and/or appropriate external safeguarding route.

No individual should be expected to report a concern to the person who is the subject of that concern.

12. What information should be provided?

Where possible, the person raising the concern should provide:

- a description of the concern;
- what they have seen, heard or been told;
- dates and times;
- names of relevant individuals;
- relevant documents or records;

- names of witnesses;
- any previous concerns raised;
- details of any action already taken;
- why they believe the matter has not been appropriately addressed;
- any immediate safeguarding or safety risks.

Information should be factual and objective.

The individual should avoid:

- exaggeration;
- speculation;
- assumptions about motives;
- investigating colleagues;
- confronting the person suspected of wrongdoing;
- altering or destroying evidence.

13. Anonymous concerns

The school will accept anonymous whistleblowing concerns where possible.

However, anonymity can make it more difficult to:

- clarify information;
- obtain further evidence;
- investigate the concern;
- provide feedback;
- protect the person raising the concern.

Individuals are therefore encouraged to identify themselves where they feel able to do so.

Anonymous concerns will nevertheless be assessed on their merits.

14. Confidentiality

The school will seek to maintain confidentiality throughout the whistleblowing process.

Information will only be shared with those who have a legitimate need to know, subject to safeguarding, legal and regulatory requirements.

The school cannot guarantee absolute confidentiality in circumstances where disclosure is required by law or is necessary to protect children or others from harm.

Where a person's identity needs to be disclosed, the school will, where reasonably practicable, discuss this with them beforehand.

Staff should also maintain confidentiality and must not discuss concerns publicly or on social media.

15. Protection from victimisation

The school will not tolerate bullying, harassment or victimisation of a worker who raises a genuine whistleblowing concern.

A worker will not be disadvantaged because they have:

- raised a genuine concern;
- sought advice about raising a concern;
- assisted with an investigation;
- provided information or evidence;
- made a protected disclosure in accordance with relevant legislation.

Any alleged retaliation will be taken seriously and may be investigated separately.

Appropriate disciplinary action may be taken against anyone found to have victimised or harassed a whistleblower.

16. False or malicious allegations

The school recognises that concerns may sometimes be raised professionally but subsequently prove to be unfounded.

A concern will **not** be treated as malicious merely because it is not substantiated.

However, deliberately dishonest, malicious or knowingly false allegations may constitute misconduct and may be addressed under the school's disciplinary procedures.

17. Initial assessment

The person receiving a whistleblowing concern will:

1. acknowledge receipt where appropriate;
2. record the concern;
3. assess the nature and seriousness of the concern;
4. determine which procedure or external route is appropriate;
5. consider whether immediate safeguarding action is required;
6. seek specialist advice where necessary;
7. identify who should investigate or manage the concern.

The person receiving the concern should not investigate the matter where there is a conflict of interest.

18. Safeguarding threshold

Where the concern relates to an adult's behaviour towards a child, the person receiving the concern will consider whether it:

- is a low-level concern;
- requires management action;
- may meet the harm threshold;
- requires referral through child protection procedures;
- requires consultation with the Local Authority Designated Officer (LADO);
- requires another safeguarding response.

The school will follow the relevant local safeguarding arrangements.

19. Investigation

Where an investigation is required, the school will appoint an appropriate person to conduct or oversee it.

The investigator should be:

- suitably independent;
- appropriately experienced;

- free from conflicts of interest;
- provided with appropriate access to relevant information.

The investigation may involve:

- reviewing documents;
- interviewing relevant individuals;
- reviewing electronic records;
- examining policies and procedures;
- seeking specialist advice;
- taking appropriate safeguarding action.

Investigations will be conducted fairly and proportionately.

20. External advice and reporting

The school may seek advice from appropriate external bodies where necessary.

Depending on the nature of the concern, this may include:

- the Local Authority Designated Officer (LADO);
- local safeguarding partnership;
- local authority safeguarding services;
- police;
- Department for Education;
- professional or regulatory bodies;
- GCC/external HR or legal advisers;
- auditors or financial advisers;
- other appropriate statutory or regulatory bodies.

The appropriate route will depend on the circumstances.

21. External whistleblowing

Staff are encouraged to raise concerns internally wherever this is appropriate and safe.

However, there may be circumstances in which an individual reasonably believes that:

- internal reporting is inappropriate;
- the concern has not been addressed;
- the person receiving the concern is implicated;
- there is a serious risk of evidence being concealed;
- children or others remain at risk;
- external reporting is otherwise appropriate.

In these circumstances, the individual may seek independent advice and may have the right to make a disclosure to an appropriate external body.

Staff should obtain advice before making an external disclosure where possible.

The school's arrangements should include current contact details for relevant external reporting routes and should be reviewed regularly.

22. NSPCC Whistleblowing Advice Line

Where the concern relates to safeguarding children and a worker is unsure how to proceed, the **NSPCC Whistleblowing Advice Line** provides advice to adults working with children.

0800 028 0285

23. Immediate danger

Where there is an immediate risk of serious harm to a child or another person, the normal whistleblowing process must not delay emergency action.

Staff should contact the appropriate emergency service where necessary.

Emergency: 999

MASH:

Children and Families Front Door Service: 01452 42 65 65 (Select Option 3)

Professional Line: 01452 427070

24. Feedback

Where appropriate, the person raising the concern will receive acknowledgement that their concern has been received.

Subject to confidentiality, data protection and legal restrictions, the school will provide appropriate information about:

- whether the concern is being investigated;
- whether action has been taken;
- whether the matter has been referred elsewhere.

The school may be unable to provide detailed information about the outcome of an investigation.

This does not mean that the concern has not been taken seriously.

25. Record keeping

The school will maintain appropriate records of whistleblowing concerns.

Records may include:

- date the concern was received;
- person raising the concern;
- nature of the concern;
- individuals involved;
- safeguarding considerations;
- action taken;
- advice sought;
- investigation arrangements;
- decisions and rationale;
- outcome;
- any follow-up action.

Records will be securely stored and accessed only by individuals with a legitimate need to know.

Records will be managed in accordance with the school's data protection and records management arrangements.

26. Conflicts of interest

Anyone involved in receiving, assessing or investigating a whistleblowing concern must declare any actual, potential or perceived conflict of interest.

A person should not manage or investigate a concern where:

- they are the subject of the concern;
- they have a close personal relationship with the subject;

- they may benefit from the outcome;
- their impartiality could reasonably be questioned.

An alternative person should be appointed where appropriate.

27. Support for the person raising the concern

The school recognises that whistleblowing can be stressful.

Where appropriate, the school will provide access to:

- a designated contact;
- occupational health;
- employee assistance services;
- appropriate HR support;
- trade union representation;
- independent advice.

Support will be provided without compromising the confidentiality or integrity of the investigation.

28. Support for individuals subject to a concern

The school recognises that being the subject of a whistleblowing concern can also be stressful.

Individuals will be treated fairly and respectfully.

Where appropriate, they will be provided with support and informed of relevant procedures.

This does not prevent the school taking immediate safeguarding or risk-management action where necessary.

29. Roles and responsibilities

All staff

All staff are expected to:

- raise genuine concerns promptly;
- follow the appropriate reporting procedure;
- maintain confidentiality;
- provide factual information;
- cooperate with appropriate investigations;
- avoid conducting their own investigation.

Headteacher

The Headteacher is responsible for:

- ensuring this policy is implemented;
- ensuring staff know how to raise concerns;
- ensuring concerns are appropriately assessed;
- ensuring conflicts of interest are managed;
- ensuring appropriate external advice is obtained;
- ensuring appropriate records are maintained.

Designated Safeguarding Lead (which might be the headteacher)

The DSL is responsible for:

- ensuring safeguarding concerns are appropriately assessed;
- ensuring relevant concerns are escalated;

- ensuring the low-level concerns process is not used where the harm threshold may be met;
- seeking appropriate safeguarding advice.

Governing Body

The governing body is responsible for:

- ensuring appropriate whistleblowing arrangements are in place;
- providing appropriate oversight;
- ensuring concerns about senior leaders are appropriately managed;
- reviewing significant themes and risks;
- ensuring the school promotes an open safeguarding culture.

30. Monitoring and review

The school will monitor the effectiveness of this policy through:

- review of whistleblowing concerns;
- safeguarding audits;
- review of low-level concern records;
- staff feedback;
- training;
- governance oversight;
- review following significant incidents;
- changes to legislation or statutory guidance.

The school will consider whether concerns indicate:

- weaknesses in safeguarding procedures;
- cultural problems;
- inadequate management;
- repeated policy failures;
- training needs;
- risks requiring wider organisational action.

31. Policy review

This policy will be reviewed at least annually and sooner where:

- legislation changes;
- DfE guidance changes;
- local safeguarding arrangements change;
- significant concerns are raised;
- an investigation identifies weaknesses;
- organisational arrangements change.