



Whistleblowing Policy

School Division: Whole School

Policy Division: Staff

Policy Owner: Human Resources

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1 Introduction

This is a 'Whole School Policy' and informs practice in the Senior School, Preparatory School, Nursery and Boarding House.

The Public Interest Disclosure Act 1998 protects employees who report wrongdoing within the workplace. It is the aim of this policy to ensure that as far as possible our employees are able to tell us about any wrongdoing at work, which they believe has occurred or is likely to occur.

Claremont School and International Schools Partnerships (ISP) are committed to delivering a high-quality education service to pupils and expect high standards from their staff and contractors. In order to maintain these high standards a culture of openness and accountability is vitally important. The aims of this policy are threefold:

- to encourage staff to raise concerns about malpractice within the School without fear of reprisal
- to reassure staff that concerns will be taken seriously
- to provide information about how to raise concerns and explain how the Principal and ISP may respond.

2. Scope of the Policy

This policy applies to all School employees, agency staff, contractors and volunteers engaged by the School. There is a separate procedure for pupils and parents to raise concerns about school related issues.

3. What is whistleblowing?

In practical terms, whistleblowing occurs when a concern is raised about danger or illegality that affects others. As the person raising the concern you will not necessarily be directly affected by the danger or illegality. Consequently you will not necessarily have a personal interest in the outcome of any investigation into your concerns. This is different from a complaint or grievance. If you make a complaint or lodge a grievance, you are saying that you personally have been poorly treated. This poor treatment could involve a breach of your individual employment rights or bullying and you are entitled to seek redress for yourself.

4. Raising Concerns on Malpractice

Malpractice covers a wide range of concerns. The types of activity that should be disclosed include but are not limited to the following:

- the physical, emotional or sexual abuse of pupils or staff
- unauthorised use of School funds and/or financial maladministration
- fraud and corruption
- failure to comply with legal obligations
- endangering of an individual's health and safety
- damage to the environment
- a criminal offence
- failure to follow financial and contract procedure rules
- showing undue favour to a contractor or a job applicant
- miscarriages of justice
- deliberate concealment of information relating to any of the above
- concerns about the professional practice or competence of colleagues, other members of staff or other workers

Staff should raise their concerns with the School Principal. The earlier a concern is raised the easier it will be to take action. You the whistleblower are a witness to events not the investigator. You do not need to wait for compelling evidence of malpractice before raising concerns but you must have reasonable grounds for your suspicion.

When reporting a concern you should provide as much information and detail as possible. In particular you should provide the full names of the people involved or who know about what is happening, including the names of those involved, dates of events and any relevant documentation. This will help the investigator to focus on the main issues quickly.

There will be some cases where it is not appropriate for you to raise concerns with your Principal, for example where you suspect your Principal already knows about the malpractice or where you suspect your Principal may be involved. In those cases, you should report your concerns to the Regional Managing Director, Will Morgan wmorgan@ispschools.com.

5. Responding to a concern

When a concern is received by the Principal, or CEO- referred to from here as the 'recipient' - they will:

Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative.

They will get as much detail as possible about the concern at this meeting, and record the information. If it becomes apparent the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure

They will reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken.

They will establish whether there is sufficient cause for concern to warrant further investigation. If there is:

- The recipient should then arrange a further investigation into the matter, if appropriate. In some cases, they may need to bring in an external, independent body to investigate, such as the Local authorities designated officer. In other cases, they may need to report the matter to the police
- The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps

6. Outcome of the investigation

Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified, and whether or not a referral is required to an external organisation, such as the local authority designated officer or police.

They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.

Beyond the immediate actions, the Principal and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

7. Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Further details of how allegations of abuse by staff are handled can be found in Appendix 3 of the Child Protection and Safeguarding Policy.

8. Low Level Concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

Responding to low-level concerns

If the concern is raised via a third party, the Principal will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Staff Code of Conduct policy.

9. Advice and Support

The School recognises that staff may wish to seek advice and support from their professional association or trade union where this is in place, before raising concerns and the school will support you in doing this.

The School undertakes that no employee who makes a *bona fide* report under this policy will be subjected to any detriment as a result, in accordance with section 47B of the Employment Rights Act 1996.

Whistleblowers who consider that they have been victimised as a result of whistleblowing should make a formal complaint to Human Resources immediately, giving details of the way in which they believe they have been subject to detriment and their reasons for thinking that the detriment might be connected with their disclosure. Appropriate action will be taken as necessary.

10. Confidentiality

The School understands that you may be reluctant to come forward with information about the wrongdoing of a colleague or manager or indeed at all. As such, the School recognises that whistleblowers may wish to raise concerns in confidence. If you (the whistleblower) make a request for the matter to be kept confidential then your identity will not be revealed without discussing the matter with you first.

11. Anonymous Allegations

It is recognised that the purpose of a whistleblowing policy is to allow people to make protected disclosure with the protection being against any reprisals or victimisation for disclosures made honestly and in good faith.

It is very difficult for some people to come forward and make a disclosure and the prospect of having to identify yourself can make the action of whistleblowing all the more daunting. You are encouraged to give your name when raising concerns. A concern expressed anonymously is much less powerful and is often more difficult to investigate and can lack credibility.

The decision whether to investigate an anonymous allegation will be made by the Principal and Regional Manager. When making this decision they will take into account the seriousness of the issues raised, the credibility of what is being said and the likelihood of confirming the allegation from other sources.

12. Protection for the whistleblower

All concerns raised under this procedure will be treated seriously and a decision made about whether or not an investigation is appropriate.

Depending upon the nature of the matter it may be referred to the external auditor or the police.

The person to whom you reported your concern will be responsible for keeping you informed about the progress of the investigation and the action, which has been taken, although you may not be told the outcome. In some cases the investigation may result in criminal or disciplinary proceedings. If this happens you may be invited to give a written statement or give evidence at a hearing. The Principal will support you in this process and ensure that you are clear about what will happen.

13. Allegations not made in the public interest

The school will not tolerate abuse of this Policy. Concerns that are raised frivolously, maliciously, or where they are known to be untrue may result in disciplinary action or, in the case of agency staff, the termination of the agency contract.

In the case of contractors, the matter will be reported to the relevant Contract Manager so that a decision can be made about the appropriate action to take.

14. Safeguarding

Nothing within this policy is intended to prevent staff from complying with their statutory obligations in accordance with Keeping Children Safe in Education (DfE, September 2024). In particular:

- Safeguarding / Child Protection Policy: You should raise any initial safeguarding concerns about a child with the Designated Safeguarding Lead in accordance with the School's Child Protection and Safeguarding Policy and Procedures.
- Safeguarding - member of staff: You should raise any concerns about another staff member with the Principal, or if the concern is about the Principal with the Regional Managing Director
- Whistleblowing Policy: You should follow this procedure to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or staff to properly safeguard the welfare of pupils if you are concerned that the School's Child Protection and Safeguarding Policy and Procedures are not being followed correctly.
- Children's Social Care: In exceptional circumstances, or if at any point there is a risk of immediate serious harm to a child, a referral should be made to Children's Social Care immediately. Further details of when to do this can be found in the School's Child Protection and Safeguarding Policy 2024.

15. Escalating concerns beyond Claremont School and International School's Partnership

Claremont School encourages staff to raise their concerns internally, in line with this policy, but recognises that staff may feel the need to report concerns to an external body. A list of prescribed bodies to whom staff can raise concerns is included [here](#).

The Local Authority Designated Officer [form](#) is in place to report allegations against members of staff that work with children. This may also be a consideration if you feel a concern has not been appropriately addressed by the school.

The [NSPCC](#) offers advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation.

16. Monitoring

ISP in partnership with Claremont School has overall responsibility for the operation of this policy

17. Links with other policies

- Code of Conduct between Staff and students
- Child Protection and safeguarding policy
- Online Safety Policy