

# Whistleblowing Policy



Written by	Harriet Carter	August 2025
Next review due by		August 2026

## **Introduction:**

Earley Springs is committed to the highest standards of openness, integrity, and accountability. This policy provides a clear and confidential procedure for staff, volunteers, and contractors to raise genuine concerns about wrongdoing, malpractice, or safeguarding issues within the school without fear of reprisal.

The school recognises its responsibilities under the Public Interest Disclosure Act 1998, the Independent School Standards (Part 7), and Keeping Children Safe in Education (KCSIE, 2025).

All concerns should ideally be raised internally in the first instance so that they can be addressed promptly. However, where this is not possible, clear and appropriate external routes are available.

## **Scope:**

This policy applies to:

- All employees of Earley Springs;
- Agency staff, volunteers, contractors, and anyone working on behalf of the school.

Whistleblowing, as defined by *Protect (formerly Public Concern at Work)*, is:

“The raising of a concern, either within the workplace or externally, about a danger, risk, malpractice or wrongdoing which affects others.”

This procedure enables individuals to raise concerns about conduct or situations that they believe to be inappropriate, unlawful, unethical, or inconsistent with the school’s values.

## **Examples of Concerns Include:**

- Breaches of law or statutory duty;
- Fraud, corruption, or misuse of public funds;
- Breaches of health and safety;
- Safeguarding or child protection failures;
- Unethical or unprofessional conduct;
- Miscarriages of justice;
- Deliberate concealment of information about wrongdoing.

Concerns relating solely to an individual’s own employment (such as pay or working conditions) should be raised under the Grievance Policy.

Concerns may be raised individually or collectively. There is no fixed time limit, but employees are encouraged to raise issues as early as possible.

## **Responsibilities**

### **Responsibilities of the School**

- Foster a culture where staff feel confident to raise concerns safely.
- Ensure that all concerns are fully considered, investigated, and acted upon.
- Provide timely feedback to those who raise concerns, where appropriate.
- Protect individuals from detriment, harassment, or victimisation.
- Make clear how concerns can be escalated if the complainant is dissatisfied.

### **Responsibilities of Employees**

- Raise concerns where there is a reasonable suspicion of wrongdoing.
- Cooperate with internal or external investigations as appropriate.
- Avoid knowingly making false or malicious allegations.

### **Oversight and Monitoring**

The Executive Board has overall responsibility for maintaining and overseeing this policy.

The Headteacher will:

- Ensure the effective implementation of whistleblowing arrangements;
- Provide training and promote awareness;
- Conduct an annual review of whistleblowing activity;
- Report outcomes and learning points (in anonymised form) to the Executive Board.

### **Monitoring will include:**

- The number and nature of concerns raised and investigated;
- Any complaints of victimisation or confidentiality breaches;
- Levels of staff awareness and confidence in whistleblowing procedures.

### **Raising a Concern**

Concerns may be raised **verbally or in writing**. Where possible, written concerns should use factual and neutral language and include:

- The background and history of the concern, with names, dates, and locations;
- The reason the individual is particularly concerned;
- A statement confirming that the concern is being raised under the whistleblowing procedure.

Employees are not expected to prove their allegations but should have a reasonable belief that wrongdoing has occurred or may occur.

### **Internal Routes**

- Headteacher: for most concerns.
- Chair of the Executive Board: where the concern involves the Headteacher or senior leadership.

(Contact details for the Chair are available from the school office.)

### **External Routes (Where Internal Disclosure Is Not Appropriate)**

For safeguarding or serious misconduct matters, concerns can also be raised with:

- **Local Authority Designated Officer (LADO)** – for concerns about adults working with children;  
[https://www.kelsi.org.uk/\\_data/assets/pdf\\_file/0008/36638/LADO-Contact-list.pdf](https://www.kelsi.org.uk/_data/assets/pdf_file/0008/36638/LADO-Contact-list.pdf)
- **Ofsted** – for concerns about safeguarding or school regulation;  
<https://www.gov.uk/government/publications/whistleblowing-about-childrens-social-care-services-to-ofsted/sharing-concerns-and-information-with-ofsted-about-childrens-social-care-services>
- **Department for Education (DfE)** – for concerns about independent school compliance; <https://www.gov.uk/contact-dfe>
- **NSPCC Whistleblowing Helpline** – 0800 028 0285 / [help@nspcc.org.uk](mailto:help@nspcc.org.uk); <https://learning.nspcc.org.uk/services/nspcc-helpline/whistleblowing-advice-line>
- **Protect (Public Concern at Work)** – independent whistleblowing advice (020 3117 2520). <https://protect-advice.org.uk>

### **How Earley Springs Will Respond**

Upon receiving a concern:

1. Acknowledgement: The concern will be acknowledged in writing within 10 working days.
2. Preliminary Enquiries: Initial enquiries will determine the most appropriate course of action.
3. Investigation: This may involve internal management review, referral to external regulators (e.g. LADO, Ofsted, Police), or no further action if evidence does not substantiate the concern.
4. Updates: The whistleblower will be kept informed, as far as possible, throughout the process.

Where an investigation is prolonged or external referrals are made, periodic updates will be provided. If the matter cannot be substantiated, or is found to be malicious or vexatious, the school may take no further action.

### **Notification of Outcomes**

Feedback will be provided wherever possible. However, confidentiality and data protection obligations may prevent the disclosure of detailed outcomes (e.g. where disciplinary or legal processes are involved). The employee will always be informed whether the matter has been addressed or concluded.

### **Protection and Support**

## **Protection from Detriment**

No employee will suffer detriment for raising a concern in good faith.

Anyone who believes they have suffered a reprisal should report this to the Chair of the Executive Board, who will review the matter in line with the Disciplinary Policy. Knowingly false or malicious allegations may result in disciplinary action.

## **Confidentiality**

The preferred approach is to raise concerns openly, but confidentiality will be respected where requested. Where it becomes necessary to disclose an employee's identity (for example, in criminal or safeguarding investigations), the individual will be informed in advance.

## **Anonymous Concerns**

Anonymous concerns will be considered at the school's discretion, depending on:

- The seriousness of the issue;
- The credibility of the concern;
- The likelihood of obtaining corroborating evidence.

## **Support**

Employees raising concerns may access:

- Wellbeing or counselling services;
- Their Trade Union or Protect (Public Concern at Work) for confidential advice.

If required to give evidence in disciplinary or criminal proceedings, additional support will be considered.

## **Record Keeping**

- Notes of meetings and all documentation will be kept securely and confidentially.
- The Executive Board will maintain a central log of all whistleblowing concerns, actions taken, and outcomes, anonymised where appropriate.
- Records will be processed in line with UK GDPR and retained for a minimum of six years or as required by law.

## **Review of This Policy**

This policy will be reviewed annually or sooner if legislation or guidance changes.

The review will consider staff feedback, case outcomes, and changes to KCSIE or the

Independent School Standards.

### External contacts

Agency/Organisation	Purpose	Contact Details
<b>Local Authority Designated Officer (LADO)</b>	Concerns about staff or adults working with children	Kent LADO: 03000 410888 / lado@kent.gov.uk
<b>Ofsted</b>	Safeguarding or school compliance concerns	0300 123 3155 / <a href="http://www.gov.uk/contact-ofsted">www.gov.uk/contact-ofsted</a>
<b>Department for Education (DfE)</b>	Concerns about independent school standards	0370 000 2288 / <a href="http://www.gov.uk/contact-dfe">www.gov.uk/contact-dfe</a>
<b>NSPCC Whistleblowing Helpline</b>	Independent advice on child protection concerns	0800 028 0285 / help@nspcc.org.uk
<b>Protect (Public Concern at Work)</b>	Independent whistleblowing advice	020 3117 2520 / <a href="http://www.protect-advice.org.uk">www.protect-advice.org.uk</a>

NB: The Proprietor (Earley Springs Ltd) retains ultimate responsibility for compliance with the Independent School Standards and delegates day-to-day management to the Headteacher, under the oversight of an independent Executive Board.