PINEWOOD

*Est. 1875*

# WHISTLEBLOWING POLICY

A Whole-School policy including the EYFS

The School has adopted this policy and the accompanying procedure on whistleblowing to enable members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, a failure to comply with legal obligations, inappropriate behaviour or unethical conduct. The policy also provides, if necessary, for such concerns to be raised outside the organisation.

Pinewood School aims to have a culture of safety, of raising concerns, of valuing staff and of reflective practice. This policy outlines the procedure for reporting and handling concerns.

## About this Policy

The School is committed to conducting its business with honesty and integrity and expects all staff to maintain high standards in accordance with our Staff Behaviour Policy. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

## Aims

The School's policy on whistleblowing is intended to demonstrate that it:-

- will not tolerate malpractice;
- encourages staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated, as appropriate;

- respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- will only invoke the School's disciplinary procedure in the case of false, malicious, vexatious or frivolous allegations. The policy seeks to reassure staff that they can raise genuine concerns without fear of reprisal, even if they turn out to be mistaken; and
- will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

**Scope of this policy**

This procedure is separate from the School's adopted procedures regarding grievances. Individuals should not use the whistleblowing procedure to raise concerns relating to their own personal circumstances, such as the way they have been treated at work. In those cases, the School's Grievance Procedure or Anti-Harassment and Bullying Policy should be used, as appropriate. If you are uncertain whether something is within the scope of this procedure you should first seek advice from the Head, the Bursar or the Director of HR.

This procedure is to enable members of staff to express a legitimate concern regarding suspected malpractice within the School.

**What is Whistleblowing?**

**Whistleblowing** is the disclosure of information which relates to suspected wrongdoing, malpractice or dangers at work. Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of ethics, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment (negligence). It also includes covering up wrongdoing in the above categories.

A **whistleblower** is a person who raises a genuine concern relating to suspected malpractice within the School. If you have any genuine concerns related to suspected malpractice affecting any of the School's activities (a whistleblowing concern), you should report it under this procedure.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may report their concerns to other whistleblowing channels, such as:

- Protect, an independent whistleblowing charity (helpline: 020 3117 2502, email: whistle@protect-advice.org.uk , website: https://protect-advice.org.uk/).
- The NSPCC whistleblowing helpline (tel: 0800 028 0285 or email: help@nspcc.org.uk).

Whistleblowing law is located in the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998). It provides the right for staff to take a case to an employment tribunal if they have been victimised at work or they have lost their job because they have "blown the whistle".

**Whistleblowing Protections for Sexual Harassment**

From April 2026 staff who report sexual harassment at work will benefit from protection under whistleblowing laws including protection against detriment and unfair dismissal. Please refer to the Harassment & Anti-Bullying Policy for further details on how to report any concerns regarding sexual harassment including details of the anonymous reporting tool which encourages any incidents or concerns regarding sexual harassment to be shared with the Director of HR. The tool can be accessed via the following link: Sharing Concerns

**Low Level Concerns**

Low Level Concerns about a member of staff should be reported to the Headmaster and staff should also feel confident to self-refer. Low Level Concerns about someone employed by a supply agency or contractor should be shared with the Headmaster, the concern will then be recorded and their employer notified to allow patterns of behaviour to be identified. Further information on Low Level Concerns can be found in the Safeguarding (Child Protection) Policy.

**Confidentiality**

We hope that staff will feel able to voice whistleblowing concerns openly under this procedure. However, if you wish to raise a concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating the concern to know your identity, this will be discussed with you.

If there is evidence of criminal activity, the Police will in all cases be informed.

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should discuss this with the Head or Bursar and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are set out above.

**The Investigation**

We hope that in many cases staff will feel able to raise any concerns with their line manager. Staff may tell them in person or put the matter in writing if they prefer. Line Managers may then be able to agree on a way of resolving staff concerns quickly and effectively. In some cases, Line Managers may refer the matter to the Head, Bursar or the Deputy Head.

However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you are at liberty to raise a whistleblowing concern to the Head, Deputy Head or the Bursar directly. If you feel unable to approach the Head, the Deputy or the Bursar directly, then the Governor with Staff Welfare responsibility, currently Mr Guy Foster, should be the first point of contact.

A meeting will be arranged with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this procedure. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. You may be required to attend additional meetings in order to provide further information as the concerns raised are investigated.

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. You will be kept informed of the progress of the investigation and its likely timescale. Whenever possible and subject to third party rights, you will be informed of the resolution. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If you are not satisfied that your concern is being properly dealt with, you will have a right to raise it in confidence with the Governor with Staff Welfare responsibility, currently Mr Guy Foster. Alternatively, you can follow the external procedure below.

**External Procedures**

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in school. In most cases you should not find it necessary to alert anyone externally.

However, where all internal procedures have been exhausted, a member of staff shall have a right of access to an external person/body. This may include (depending on the subject matter of the disclosure) HMRC, the Audit Commission, the Health and Safety Executive and/or the Local Authority Designated Officer (where the disclosure relates to a child protection issue).

It will very rarely, if ever, be appropriate for you to alert the media.

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the individual reasonably believes :-

- that exceptionally serious circumstances justify it;
- that the School would conceal or destroy the relevant evidence;
- where they believe they would be victimised by the School; or
- where the Secretary of State has ordered it.

We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

**Malicious Accusations**

False, malicious, vexatious or frivolous accusations will be dealt with under the School's Disciplinary Procedure.

**Protection from Reprisal or Victimisation**

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

No member of staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and following the Whistleblowing procedures. If you believe that you have suffered any such treatment, you should inform the Head, Deputy Head or Bursar immediately. If the matter is not remedied, you may raise it formally using the School's Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

**Training & Communication of the Policy**

All staff are required, on an annual basis, to re-read the Whistleblowing Policy and sign to say they have read and understood it. The Policy is referenced in the Staff Handbooks and new staff are informed of it during their inductions.

**Monitoring**

A record is kept by the Headmaster detailing the number of whistleblowing disclosures the School has received and the content of feedback provided to whistleblowers. Where appropriate regular contact will be made with the whistleblowers to ascertain their satisfaction.

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