



WHISTLE BLOWING POLICY

- 1 **About this policy:** The School is committed to conducting its business with honesty and integrity, and we expect all staff to maintain high standards in all aspects of their conduct. The School recognises that raising a whistleblowing concern can be daunting. However, it is important that any concerns are raised promptly in accordance with this policy so that the School can respond appropriately.
- 2 **Aims:** This policy is designed to encourage you to report suspected wrongdoing as soon as possible, with the assurance that your concerns will be taken seriously and investigated appropriately. It provides guidance on how to raise concerns and reassures you that you can do so without fear of reprisals, even if your concerns are ultimately unfounded.
- 3 **Staff:** This policy covers all employees, officers, governors, consultants, contractors, volunteers, work placement students, casual workers and agency workers.
- 4 **Non-contractual policy:** This policy does not form part of your contract of employment and we may amend it at any time.

Wrongdoing at work

- 5 **Whistleblowing:** Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:
 - 5.1 criminal activity;
 - 5.2 safeguarding concerns (see paragraph 21 below);
 - 5.3 failure to comply with any legal or professional obligation or regulatory requirements;
 - 5.4 miscarriages of justice;
 - 5.5 danger to health and safety;
 - 5.6 damage to the environment;
 - 5.7 bribery;
 - 5.8 financial fraud or mismanagement;
 - 5.9 other unlawful or unethical conduct in the workplace;
 - 5.10 the deliberate concealment of any of the above matters.
 - 5.11 exam-related breaches (see paragraph 6)
- 6 **Examinations:** Centre malpractice can be reported by any member of the school. The following are some examples of malpractice in examinations; this list is not exhaustive:
 - 6.1 Failure to comply with exam regulations as set out by the Joint Council for Qualifications (JCQ) and its awarding bodies;
 - 6.2 A security breach of the examination paper;
 - 6.3 Conduct of centre staff which undermines the integrity of the examination;
 - 6.4 Unfair treatment of candidates by either giving an advantage to a candidate/group of candidates (e.g. by permitting a candidate an access arrangement which is not supported by appropriate evidence), or disadvantaging candidates by not providing access to the appropriate conditions (providing a 'level playing field');
 - 6.5 Possible fraud and corruption (e.g. accessing the exam paper prior to the exam to aid teaching and learning);

- 6.6 Abuse of authority (e.g. the head of centre/members of the senior leadership team overriding JCQ and awarding body regulations);
- 6.7 Other conduct which may be interpreted as malpractice/maladministration.

With cases of centre malpractice, you may choose to use the stages mentioned below or you may choose to contact the awarding body or JCQ directly. If you do this, you will need the following information in order for them to investigate:

- The qualifications and subjects involved
- The centre involved
- The names of staff/candidates involved
- The regulations breached/specific nature of suspected malpractice
- When and where the suspected malpractice occurred
- Whether multiple examination series are affected
- If the issue has been reported to the centre and what the outcome was
- How the issue became apparent

- 7 **Concerns about your own conduct:** Whistleblowing involves raising a genuine concern about suspected wrongdoing or danger affecting the School or its activities in the public interest. Reporting concerns about your own conduct or mistakes is not whistleblowing but part of your contractual duty of disclosure. The School encourages openness and accountability, recognising that honest mistakes happen, and employees who come forward will be treated fairly, with their honesty taken into account. While no one will face unfair consequences for self-reporting in good faith, this policy does not provide whistleblowing protection for individuals disclosing their own wrongdoing.
- 8 **Grievances:** Complaints relating to your personal circumstances that do not serve the public interest do not fall under this whistleblowing policy. Such matters should be raised through the School's separate grievance procedure.
- 9 **Advice:** If you are uncertain whether something is within the scope of this policy you should seek advice from the Bursar, Designated Safeguarding Lead, Protect, the NSPCC whistleblowing helpline or the Modern Slavery helpline.

How to raise a concern

- 10 **Initial contact:** We hope that in many cases you will be able to raise any concerns with your line manager or a member of the Senior Leadership Team. However, where you prefer not to raise it with your manager or with a member of the Senior Leadership Team for any reason, you should contact the Bursar. Further contact details are at the end of this policy.
- 11 **Meeting:** We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

Responding to your concern

- 12 **Investigation:** The manager to whom you raise your concern will determine whether an investigation is required and, if so, who is best placed to conduct it. You will receive written confirmation that an investigation is underway, along with an estimated timescale for completion. The scope and duration of the investigation will depend on the nature of the suspected wrongdoing. Once the investigation is concluded, you will be informed in writing of the outcome and any next steps as soon as possible. Please note there may be instances where full details cannot be disclosed due to data protection requirements or confidentiality considerations.

If you are not satisfied

- 13 **Taking your concerns further:** We will always try to deal with your concern fairly and in an appropriate way. If you are not satisfied with how your concern has been handled, you may contact the Chair of Governors, either orally or in writing, in order to explain your concerns. If necessary, you may be asked to attend a meeting, which will be arranged as soon as possible. You may bring a colleague to the meeting if you wish. Where appropriate, a member of the HR department may also be present. The relevant manager will assess how your original concern was handled before informing you in writing of any outcomes as soon as possible.
- 14 **Confidentiality:** We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.
- 15 **Anonymous disclosures:** Completely anonymous disclosures are difficult to investigate, and we will not be able to provide you with feedback. However, we would rather you raise a concern anonymously than remain silent, and we will investigate all reports to the best of our ability.

Whistleblower protection

- 16 **Openness and support:** We encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if their concerns turn out to be mistaken. If you raise a whistleblowing concern in accordance with this policy, we will ensure that you are treated with respect and provided with appropriate support and protection.
- 17 **Protection from detrimental treatment:** You have the right not to be subjected to any detrimental treatment (such as being unfairly penalised, disciplined, or dismissed) because you have raised a whistleblowing concern. If you believe you have suffered any such treatment, you should report the matter immediately to Bursar. If the issue is not resolved, you may also raise it formally under our grievance procedure.
- 18 **Prohibition on retaliation:** No one must threaten or retaliate against a whistleblower in any way. Any such behaviour will not be tolerated and will be treated as a disciplinary offence. In some cases, a whistleblower may also have the right to bring a claim for compensation against an individual responsible for detrimental treatment.
- 19 **False allegations:** While whistleblowers who raise genuine concerns will be protected, any individual found to have knowingly made false allegations maliciously may be subject to disciplinary action.
- 20 **External support:** Protect operates a confidential helpline for whistleblowers. Their contact details are at the end of this policy.
- 21 **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 2025). In particular:
 - 21.1 **Safeguarding:** If you have any concern about a pupil's welfare, action should be taken immediately (even if they are low concerns). You should report the concern to the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead. See the School's child protection and safeguarding policy and procedures for full information about what to do if you have a concern about a pupil, including what to do if the Designated Safeguarding Lead is not available
 - 21.2 **Safeguarding - member of staff:** You should raise any concerns about another staff member (even if they are low level concerns) with the Head Master, or if the concern is about the Head Master, with the Chair of Governors (without first

notifying the Head Master) in accordance with the School's child protection and safeguarding policy and procedures.

- 21.3 **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 fulfil its safeguarding responsibilities.

- 22 **The Modern Slavery helpline:** The School is committed to the prevention of Modern Slavery. If you have any queries relating to Modern Slavery please contact the Bursar. Identified instances of modern slavery should be immediately notified to the police. If you think you have identified an instance of modern slavery, or if you consider that you may be a victim of modern slavery you may contact the Modern Slavery helpline, whose details are at the end of this policy..

External reporting

- 23 **Outside body:** The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. The law recognises that in some circumstances it may be appropriate for you to report your concerns to a relevant outside body including:

- 23.1 the local authority's Designated Officer;
- 23.2 Children's Social Care;
- 23.3 the NSPCC;
- 23.4 the Health and Safety Executive;
- 23.5 the Environment Agency;
- 23.6 the Information Commissioner;
- 23.7 the Department for Education where referrals can be made at <https://www.gov.uk/contact-dfe>;
- 23.8 the Department for Business, Energy and Industrial Strategy;
- 23.9 the Police;
- 23.10 the Charity Commission;
- 23.11 the Independent Schools Inspectorate;
- 23.12 the Office for Standards in Education, Children's Services and Skills (**Ofsted**);
- 23.13 the Channel Police Practitioner;
- 23.14 the JCQ or relevant body (for examinations malpractice).

- 24 **Advice:** Staff are strongly encouraged to seek advice before reporting a concern to anyone external. In most cases you should not find it necessary to alert anyone external but before you do, as well as considering the internal help and support available which is identified above, please seek external advice from:

- 24.1 **Protect:** If you have any concerns about disclosing a suspected wrongdoing the independent whistleblowing charity, Protect, operates a confidential helpline. Staff can call 020 3117 2520 for advice.
- 24.2 **NSPCC:** The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8.00 am to 8.00 pm Monday to Friday and 9.00 am – 6.00 pm Saturday and Sunday) or email help@nspcc.org.uk.
- 24.3 **The Modern Slavery helpline:** The Modern Slavery helpline is available for staff who do not feel able to raise concerns about modern slavery internally. Staff can call on 0800 0121 700.

- 25 **The media:** You should under no circumstances approach a commercial body or the media with details of the suspected wrongdoing. If you approach any such body and / or where

your concern is disclosed in a malicious manner or for personal gain the protection given to you by this procedure may be lost. Additionally, the School may consider this to be gross misconduct and disciplinary action may be taken against you.

26 **Queries:** If you have any queries about this procedure, you should contact the Bursar.

Head Master
September 2025