Archbishop Tenison's
CHURCH OF ENGLAND HIGH SCHOOL

# School Policy 33 - Whistleblowing

This policy was last reviewed by Governors in September 2026.
The Governors' Committee responsible for this is the Staff, Finance and Premises Committee.
The person in the school who prepares the text of this policy for the Governors is the Headteacher. It will next be reviewed in September 2027.

**Introduction**

**1** As an employee of a school, you may be the first to realise that there may be something seriously wrong within the organisation. However, you may not express your concerns because you feel that speaking up would be disloyal to colleagues or the organisation. You may fear harassment or victimisation, and think it may be easier to ignore the concern rather than report it.
**2** The Governors of the school are committed to the highest standards of openness, probity and accountability. In line with that commitment, we encourage employees, who have serious concerns about any aspect of the school's work, to come forward and voice those concerns.
**3** It is recognised that certain cases will have to proceed on a confidential basis. This policy document makes it clear that staff can do so without fear of reprisals. This Whistle blowing Policy is intended to encourage and enable staff of the school, to raise serious concerns within the school rather than overlooking a problem or discussing it externally.
**4** In addition, the policy provides a means for you to raise a concern under the Public Interest Disclosure Act 1998, which provides you with a certain level of legal protection if you wish to raise legitimate concerns.

**Rationale: Aims and Scope of the Policy**

• To provide avenues for you to raise concerns and receive feedback on any action taken
• To allow you to take the matter further if you are dissatisfied with the school's response and
• To reassure you that you will be protected from reprisals or victimisation for whistle blowing based on a reasonable belief that the disclosure is in the public interest, or from any form of workplace bullying or intimidation.

There are existing procedures in place to enable you to lodge a grievance relating to your own employment with the school. This whistle blowing policy is intended to cover concerns that fall outside the scope of other procedures, although the school reserves the right to determine which procedure is appropriate.

Concerns to be reported under this policy may relate to something that:

- is unlawful
- is against the school's Contract Procedure Rules, Financial Procedure Rules or other policies
- falls below established standards or practice
- or amounts to improper conduct

**Responsibilities**

- **The school Governing Body** has overall responsibility for:
  - maintaining and operating the policy
  - annual review of the policy
  - annual report on the effectiveness of the policy
  - approving amendments to the policy

    - promoting the policy periodically
    - maintaining a record of concerns raised and the outcomes (but in a form that does not endanger your confidentiality).
- **Croydon Council** has the responsibility to provide advice and support for whistle blowing matters.
- **Managers/Leaders** have the responsibility to undertake investigations without undue delay and to maintain confidentiality.
- **Employees** have the duty to raise issues of concern responsibly.
- **Others:** As an employee of a contractor of the school or a partner organisation, it is recognised that in some cases, you may have concerns which you may want to bring to our attention. The school is committed to encouraging all individuals, including non-school employees, to raise serious concerns with the organisation. Whilst we would seek always to protect the anonymity of individuals raising concerns based on a reasonable belief that the disclosure in in the public interest, the Whistle blowing Policy does not protect employees of external organisations in the same way as school employees. Nevertheless, employees of a contractor should raise the matter internally by seeking to raise the allegation with the Headteacher.

**Principles:**

1. **Safeguards**

**Harassment or Victimisation:** The school recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The school will not tolerate harassment or victimisation and will take action to protect you when you raise a concern based on a reasonable belief that the disclosure is in the public interest. This does not necessarily mean that if you are already the subject of procedures such as disciplinary, improving performance, grievance or managing attendance, that those procedures will be halted as a result of your whistle blowing.
Where feasible, you will be contacted when your concern has been investigated to ascertain whether you have suffered any detriment as a result of your whistle blowing. If at any time, either during or after the investigation, you feel that you have suffered any bullying or harassment as a result of your whistle blowing you should contact the Headteacher or the Chair of Governors.

**Confidentiality:** The school treats the details of all whistleblowers in confidence and will do its best not to divulge your identity. However, it must be appreciated that the investigation process may reveal the source of the information without us revealing your identity directly, and a statement by you may be required as part of the evidence.

**Anonymous Allegations:** Allegations can be made anonymously. However, this policy encourages you to put your name to your allegation, as concerns expressed anonymously are often much more difficult to investigate. For example, we may need to contact you to obtain further information or verify the details you have already given us.
Anonymous allegations will be considered wherever possible at the discretion of the school. The factors to be taken into account when determining whether an investigation in such a case can proceed would include:

- the seriousness of the issues raised
- the credibility of the concern; and
- the likelihood of confirming the allegation from other, attributable sources

**Untrue Allegations:** If you make an allegation motivated by a reasonable belief that the disclosure is in the public interest, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make malicious or vexatious allegations, appropriate action may be taken against you. From June 2013 an allegation need not be made in good faith, however a disclosure motivated by malice or revenge may affect the outcome of the process.

2. **Main legislative and National Guidance and other relevant documents**
   Public Interest Disclosure Act 1998
   Data Protection Act (1998)
   Freedom of Information Act (2000)
   Employment legislation
   Employment policies
   Employment Law - Whistleblowing 25 June 2013

3. **Procedures**
   **How to Raise a Concern**

1. The earlier you express the concern, the easier it is to take action.
2. As a first step, you should normally raise concerns with your immediate manager or other appropriate manager. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, if you believe that management is involved, you should contact the Headteacher or the Governing Body
3. The department for Children, Young People and Learners in Croydon (CYP&L) can offer further guidance and support. If you fell that the matter cannot be raised with the Headteacher or Chair of Governors then you should communicate the disclosure through the Council's Departmental Complaints Officer (DCO) in CYP&L by an email to: schoolwhistleblowing@croydon.gov.uk. Alternatively, there is a confidential reporting service available by **Protect** (formerly **Public Concern at Work**) on telephone number **020 7404 6609 (advice line)**. Protect will provide advice and, should the Discloser wish them to do so, also provide details of the allegations to the Exacutive Director CYPE who will refer it to a Designated Assessor to be dealt with in accordance with this procedure.
4. You may invite your trade union or professional association to raise a matter on your behalf.
5. Concerns can be raised by the following methods. All referrals made will be treated in the strictest of confidence.
   - Your line manager
   - Headteacher
   - Chair of Governing Body
   - Croydon Council (see 3.3 above)
   - Your union or professional association representative
6. Although you are not expected to prove an allegation, you will need to demonstrate that there are sufficient grounds for your concern.
7. There are special rules surrounding the gathering of evidence. Any attempt to gather evidence by people who are unfamiliar with these rules may adversely affect the outcome of the case as evidence has to be collected in accordance with current legislation.

8. Concerns are best raised in writing. The sort of information required to investigate an allegation are details of the background and history to the case, names, dates, places and, where possible, the reason why you are particularly concerned.

**How the School will Respond**

1. On receipt of the disclosure, the Headteacher/Chair of Governors will offer to interview you in confidence. The interview will take place as soon as practicable after the initial disclosure. The school may refer to the Local Authority Designated Officers (LADOs) who will advise what the best course of action will be. This could include:
    - internal investigation
    - referral to the Police
    - an independent inquiry
    - or any combination of the above

2. In order to protect individuals and the school, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations that fall within the scope of specific procedures (for example, child protection or discrimination issues) will normally be referred for consideration under those procedures.

3. Some concerns may be resolved by agreed action without the need for investigation.

4. Within ten working days of a concern being received, where appropriate, the school will write to you:
    - acknowledging that the concern has been received
    - indicating how it proposes to deal with the matter (including potential timescales)
    - telling you whether any initial enquiries have been made; and
    - telling you whether further investigations will take place and, if not, why not.

5. The amount of contact between the person(s) considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from you.

6. When any meeting is arranged, you have the right, if you wish, to be accompanied by a union or professional association representative or a colleague who is not involved in the area of work to which the concern relates.

7. The school will take steps to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, the school will advise you about the procedure.

8. The school acknowledges the need to provide you with assurance that the matter has been properly addressed. Thus, subject to legal constraints, you will receive appropriate information about the extent and outcomes of any investigations**.**

**Review, Monitoring and Evaluation –** see **Responsibilities** above.
**Equality Impact Assessment** The equality impact assessment of this policy is wholly positive as the policy supports the opportunity to address equality and diversity issues.