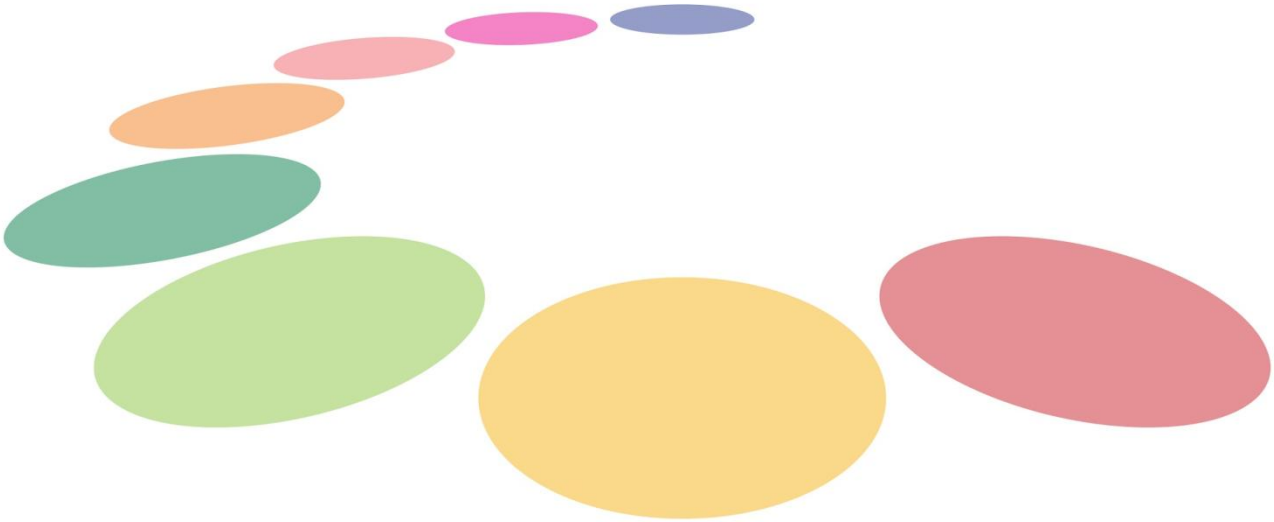
Claremont Primary School
Whistleblowing Policy and Procedure



The Six Principles of Nurture

The nurturing approach offers a range of opportunities for children and young people to engage with missing early nurturing experiences, giving them the social and emotional skills to do well at school and with peers, develop their resilience and their capacity to deal more confidently with the trials and tribulations of life, for life.

1. Children's learning is understood developmentally
2. The classroom offers a safe base
3. The importance of nurture for the development of wellbeing
4. Language is a vital means of communication
5. All behaviour is communication
6. The importance of transition in children's lives

Agreed Date	**September 26**
Review Date	**September 28**

Whistleblowing Policy

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1. INTRODUCTION

1.1. Claremont Primary School is committed to the highest standards of transparency, probity, and accountability. This policy provides a formal internal framework for individuals to disclose concerns regarding illegal or improper conduct.

1.2. In accordance with the Public Interest Disclosure Act 1998 (PIDA), the school ensures that any individual who makes a disclosure in the reasonable belief that it is in the public interest will be protected from dismissal and other workplace detriment as a result of making that disclosure.

1.3. The school accepts that individuals may prefer to raise concerns confidentially.

1.4. This policy applies to all employees, permanent and temporary staff, agency workers, contractors, and those on work experience. While volunteers and Governors are not 'workers' under the legal definition of the Public Interest Disclosure Act, the School extends the principles of this policy to them to ensure all concerns can be raised safely.

2. AIMS AND SCOPE

2.1. As an individual connected to School, this Policy aims to:

2.2. Encourage you to feel confident in raising serious concerns about illegal or improper conduct, and to question and act upon concerns about practice.

2.3. Provide a structured procedure for raising concerns and ensure that you are informed of the progress and, where legally permissible, the outcome of any investigation.

2.4. Ensure that you receive a response to your concerns and that you are aware of how to pursue them if internal processes are not successful.

2.5. Reassure you that you will be protected from possible reprisal or victimisation if you have a reasonable belief that you have made any disclosure in the public interest.

2.6. Maintaining a culture where reporting 'near misses' or emerging patterns of improper conduct is viewed as a proactive contribution to the safety and integrity of the school.

3. QUALIFYING DISCLOSURES

3.1. The law provides protection for individuals who raise legitimate concerns about specified matters. These are called "qualifying disclosures". This Policy is not designed to replace or be used as an alternative to the grievance procedure.

3.2. A qualifying disclosure is one made in the public interest by an individual who has a reasonable belief that one of the following is being, has been or is likely to be committed:

- 3.2.1. a criminal offence;
- 3.2.2. a miscarriage of justice;
- 3.2.3. an act creating significant risk to health and safety;
- 3.2.4. an act causing significant damage to the environment;
- 3.2.5. Unauthorised or Inappropriate use of public funds
- 3.2.6. an act of fraud or corruption
- 3.2.7. Poor or unsafe safeguarding practice in the trust or its schools, including failure to act on concerns about a child or the behaviour of an adult.
- 3.2.8. sexual harassment (including harassment by colleagues or third parties, such as parents or contractors); or
- 3.2.9. a breach of any other legal obligation; or
- 3.2.10. concealment of any of the above;

4. PROTECTED DISCLOSURES

4.1. The school operates a culture of openness and will not tolerate any harassment or victimisation of a whistleblower, including informal pressures. An individual making a disclosure in the reasonable belief that it is in the public interest will not be penalised, and the school may be held vicariously liable for any detriment or harassment caused to a whistleblower by their colleagues. Appropriate action will be taken to protect individuals who raise a concern that they believe is in the public interest to disclose.

4.2. Any staff member found to be victimising a whistleblower will face formal disciplinary action, up to and including dismissal.

4.3. The school has a duty under the Worker Protection (Amendment of Equality Act 2010) Act 2023 and Employment Right Act 2025 to take reasonable steps to prevent sexual harassment in the workplace including harassment from third parties.

4.4. Disclosures related to sexual harassment are protected disclosures. We are committed to a 'zero tolerance' approach, and any report of this nature will be handled with the highest level of urgency and sensitivity.

4.5. If an investigation concludes that a disclosure was made falsely and with malicious intent, disciplinary action may be taken. However, provided the individual has a reasonable belief that the disclosure is in the public interest, they will be protected regardless of their underlying motivation.

5. DISTINCTION WITH INDIVIDUAL GRIEVANCES

5.1. This policy is not intended for personal grievances relating to an individual's employment contract or terms and conditions, which should be raised under the School Grievance, Bullying and Harassment Policy.

5.2. However, where a grievance reveals a wider systemic failure, such as a failure to prevent sexual harassment or a breach of health and safety affecting others, it may be treated as a protected disclosure under this policy.

6. CONFIDENTIALITY AND ANONYMOUS ALLEGATIONS

6.1. A concern reported under this policy will be treated confidentially. Unless the individual agrees, their identity will not be disclosed by the School in dealing with their concern.

6.2. Where a concern relates to the immediate safety or welfare of a child, staff should follow the School child protection safeguarding policy and speak to the relevant designated safeguarding lead (DSL) without delay, in addition to using this whistleblowing procedure.

6.3. However, this policy encourages individuals to put their name to allegations whenever possible. Concerns expressed anonymously will be considered at the discretion of the School.

6.4. In exercising this discretion, the factors to be taken into account include:

6.5. The seriousness of the issues raised.

6.6. The credibility of the concern.

6.7. The likelihood of confirming the allegation from attributable sources.

6.8. In the event of a concern disclosing alleged criminal activity, the individual may be asked to help the police or other appropriate enforcement agency. In the event of disciplinary action taken by the School, the individual may be asked to give evidence under the School Disciplinary Policy.

6.9. If an individual believes that the claim was made in the public interest, but the claim is not confirmed following investigation, no action will be taken against the individual.

6.10. However, maliciously making a false allegation is a disciplinary offence.

7. HOW TO RAISE A CONCERN

7.1. Individuals, where possible, should raise concerns with their immediate manager or the Headteacher, taking into account the seriousness and sensitivity of the issues involved, and who is suspected of the malpractice, it is accepted this may not be appropriate. For example, if the individual believes that the Head Teacher is involved, they should approach the Chair of Governors.

7.2. The earlier a concern is expressed, the easier it is to take action.

7.3. The complainant is not expected to prove an allegation, they will be encouraged to provide as much information as reasonably possible that establishes a reasonable basis for the concern.

7.4. Concerns may be raised verbally or, preferably, in writing.

7.5. Individuals who wish to submit a written concern are invited to use the following format:

7.6. The background and history of the concern (giving relevant dates).

7.7. The reason why you are particularly concerned about the situation.

7.8. Any information you have regarding why you believe the matter is in the public interest (optional, but helpful for the investigation).

7.9. Appendix A in this policy, provides a template form for submitting a written concern.

7.10. Advice/guidance on how to pursue matters of concern may be obtained from any of the names listed at the back of this policy.

7.11. Individuals may invite a trade union representative, or a work colleague, to be present during any meetings or interviews in connection with the concerns that they have raised.

8. HOW THE SCHOOL WILL RESPOND

8.1. Initially all concerns raised under this Policy will be referred to the Headteacher/Chair of Governors who may take legal and professional advice as required.

8.2. The reported matter may:

- 8.2.1. be investigated by management, Internal Audit, or through the disciplinary process.
- 8.2.2. be referred to the police.
- 8.2.3. be referred to the external auditor
- 8.2.4. form the subject of an independent inquiry.

8.3. In order to protect individuals and those accused of illegal or improper conduct, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

8.4. Concerns or allegations, which fall within the scope of specific procedures (for example, child protection or discrimination issues), will normally be referred for consideration under those procedures.

8.5. Some concerns may be resolved by the Governing Body without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

8.6. Where a disclosure concerns sexual harassment, the School will not only investigate the specific allegation but will also review the effectiveness of its preventative measures and risk assessments in line with the Worker Protection Act 2023.

8.7. Within a reasonable period (usually within 5 working days - excluding periods of school closure) of a concern being referred to the Chair of Governors, they will write to the complainant:

8.8. Acknowledging that the concern has been received.

8.9. Indicating how the matter is to be dealt with.

8.10. Giving an estimate of how long it will take to provide a final response, telling you whether any initial enquiries have been made.

8.11. Telling you whether further investigations will take place and if not, why not.
8.12. The amount of contact between the person(s) considering the issues and the complainant will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, the School may seek further information from the complainant.
8.13. The School will take steps to minimise any difficulties that complainants may experience as a result of raising a concern. For instance, if they are required to give evidence in criminal or disciplinary proceedings the School will arrange for advice on the process to be given.
8.14. The School accepts that the complainant expects to be assured that the matter has been properly addressed. The Chair of Governors, subject to any legal constraints and Data protection, will inform you of the outcome of any investigation that may take place.
8.15. Please note, complainants may not be given any information regarding possible sanctions against the employee that any of the concerns were raised about.

9. THE RESPONSIBLE OFFICER

9.1. The Chair of Governors has overall responsibility for the implementation of this Policy. If the Chair of Governors is the subject of the whistleblowing, the concern should be directed to the Local Authority.
9.2. The Responsible Officer will maintain a central record of all whistleblowing concerns and outcomes. This record will be reviewed annually to identify any systemic trends, particularly regarding safeguarding or workplace harassment, to ensure preventative measures remain effective.

10. HOW THE MATTER CAN BE TAKEN FURTHER

10.1. This Policy is intended to provide a way within the School to raise concerns. The School hopes individuals will be satisfied with any action taken. If they are not, and feel they wish to take the matter outside the School, the following are possible contact points:
10.2. The School external auditor
10.3. The Education and Skills Funding Agency (ESFA)
10.4. Ofsted (specifically for concerns regarding safeguarding or education standards)
10.5. The Department for Education
10.6. A list of other 'prescribed persons' can be found at GOV.UK (Search: 'Whistleblowing: list of prescribed people and bodies')."
10.7. Your trade union
10.8. Your local Citizens Advice Bureau
10.9. Relevant professional bodies or regulatory organisations
10.10. A relevant voluntary organisation
10.11. The police
10.12. 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 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk
10.13. If an individual chooses to disclose the matter outside the School, they must ensure that confidential information is not disclosed to any person who is not authorised to receive it.

11. RELATED POLICIES AND DOCUMENTATION

This policy should be read in conjunction with the following School policies:

- Grievance, Bullying and Harassment Policy

- Safeguarding and Child Protection Policy
- Disciplinary Policy
- Equality, Diversity and Inclusion Policy
- Staff Code of Conduct
- Sexual Harassment Policy

APPENDIX A: WHISTLEBLOWING REPORT FORM

This ensures the whistleblower provides the right information from the start, reducing subjective interpretation during the initial assessment.

Personal Details	
Name	_____
Job Title / Relationship to School	_____
Contact Number	_____
Email Address	_____
Confidentiality Preference	I wish for my identity to remain confidential. (Please note: while the School will make every effort to maintain confidentiality, it cannot be guaranteed if the matter leads to legal proceedings or police involvement.)
Details of the Concern	Please describe the nature of your concern. Include dates, times and locations where possible, and the names of any individuals involved:
Evidence and Documentation	Please list any documents, emails, recordings or witnesses that support your concern. (You may attach copies of relevant documents to this form):
Public Interest Belief	Please briefly outline why you believe this matter is in the public interest (e.g. it affects the safety of pupils, involves the misuse of public funds, or reveals a failure to prevent sexual harassment):
Previous Reporting	Have you raised this concern with anyone else (e.g. a line manager or Headteacher) previously? If so, whom did you speak to, and when?
Declaration	I confirm that I am making this disclosure in the reasonable belief that the information provided is true and that the matter is in the public interest.
Signature	_____
Date	_____

Submission Instructions

Please submit this form in a sealed envelope marked "Strictly Private and Confidential - For the Attention of the [Name / role e,g Anne Conboy/Headteacher].
Alternatively, you may email this form to: head@claremont.manchester.sch.uk.
If your concern relates to the Headteacher, please submit this form directly to the Chair of Governors.
If it relates to the Chair of Governors, please contact the Local Authority / ESFA as detailed in Section 10 of this policy.

APPENDIX B: FORMAL ACKNOWLEDGEMENT LETTER

This letter is crucial for compliance with the 'five working day' rule mentioned in Section 8, and should be sent following receipt of a disclosure.

Draft wording

Dear [Name],

Re: Formal Disclosure under the Whistleblowing Policy

Thank you for your disclosure dated [Date] regarding [Brief Summary of Subject].

This letter confirms that your concern has been received and will be handled in accordance with the School Whistleblowing Policy. We are now conducting an initial assessment to determine the appropriate track for investigation.

You can expect a further update by [Date - usually 10 working days from now] regarding the next steps.

We remind you that the School prohibits any form of victimisation or detriment against individuals who raise concerns in the public interest.

If you have any immediate concerns regarding your wellbeing or treatment at work following this disclosure, please contact [Insert name/role, e.g. HR/Named Officer] immediately.

Yours sincerely,

[Include name and role here]