St Hilary's Prep School Policy

Whistleblowing Policy

St Hilary's School encourages everyone working for or on behalf of the School to raise concerns about wrongdoing, unsafe practice or failures in safeguarding. We will listen, act promptly and protect people who raise concerns from retaliation. A concern about a child's immediate safety must be reported at once through the safeguarding route below; this policy does not delay urgent protective action.

Purpose and scope

This policy applies to employees, governors, supply and agency staff, trainee teachers, volunteers, contractors and others working in or on behalf of the School. Legal protection for a protected disclosure depends on the person's legal status and the circumstances of the disclosure. The School will nevertheless take concerns seriously from everyone covered by this policy. Parents and pupils should use the safeguarding or complaints routes appropriate to their concern.

The policy covers information which a worker reasonably believes tends to show wrongdoing that affects others and is in the public interest. Under the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998 and subsequent legislation, qualifying matters include a criminal offence; breach of a legal obligation; miscarriage of justice; danger to health or safety; damage to the environment; sexual harassment; and deliberate concealment of any such matter. These may have happened, be happening or be likely to happen. Safeguarding failures, fraud and serious breaches of school standards can fall within these categories. Staff need not investigate or prove the matter before speaking up.

An issue solely about an individual's own employment will normally use the grievance procedure. A concern can engage more than one procedure: the School will identify the appropriate route without requiring the reporter to classify it. Nothing in this policy restricts a person from reporting a crime, seeking legal advice or making a disclosure to a prescribed person where the legal conditions are met.

Safeguarding concerns and urgent action

Concern about a child: tell the designated safeguarding lead (DSL) or a deputy without delay and follow the Safeguarding Policy Child Protection Policy. If the child is in immediate danger, contact children's social care or the police immediately.

Concern or allegation that an adult working in or for the School has harmed or may pose a risk of harm to a child: report without delay to the Headmaster, who will consider referral to the local authority designated officer (LADO) under the allegations procedure. If it concerns the Headmaster, report directly to the Chair of Governors without informing the Headmaster. If there is a conflict of interest in reporting to the Headmaster or Chair, report directly to the LADO.

A concern about adult conduct that does not meet the harm threshold must be shared under the School's Low Level Concerns Policy. Staff should still report it even if unsure of the threshold. The person receiving it will determine the correct route.

Poor or unsafe safeguarding practice or a failure to respond to a concern can be raised with the DSL, senior leadership or the routes in this policy. If staff cannot raise it internally or believe it is not being addressed, the NSPCC Whistleblowing Advice Line is an alternative route.

The safeguarding, allegations and low level concerns procedures govern referrals, records and decisions. A form may help make a record but must never delay a verbal report or urgent referral. The School will consult the LADO where required before beginning an internal investigation into an allegation that may meet the harm threshold.

How to raise a whistleblowing concern

A worker may speak or write to their line manager, the Headmaster or the Chair of Governors, choosing a route that avoids anyone implicated in the concern. Concerns about the Headmaster go to the Chair; concerns about the Chair or governing body may go to another unimplicated governor or an appropriate external body. For child safeguarding conflicts, contact the LADO directly. The School office can arrange confidential delivery to the Chair in a sealed envelope marked "Private and confidential – Chair of Governors", without routing the substance through the person concerned. Or the worker may contact the Chair of Governors directly at J.alliss@saintedmunds.co.uk.

Give the facts as clearly as possible: what happened, when and where, who may be affected, any documents or witnesses, and whether the risk is continuing. State if you fear retaliation or need a particular contact arrangement. A concern may be raised orally; the recipient will make an accurate written record and offer the worker a chance to check it. No worker is expected to gather evidence in a way that puts a child, themselves or an investigation at risk.

Response and investigation

The recipient will assess immediate safety and safeguarding needs first, refer to the DSL, LADO, police or regulator where appropriate, and identify an unconflicted case manager. The case manager will acknowledge a non-urgent concern normally within ten working days, explain the next steps and likely timescale where possible, and keep the worker reasonably informed. Urgent action is taken immediately and is not held pending written acknowledgement.

The School may investigate internally, appoint an independent investigator, refer to an appropriate authority or take other proportionate action. It will keep a secure record of the concern, triage, referrals, decisions, evidence, outcome and actions. A worker may be accompanied at meetings by a colleague or trade union representative. The person who is the subject of a concern will be treated fairly and given an appropriate opportunity to respond, subject to safeguarding, police or LADO advice.

The School will explain the outcome and any steps it can share, subject to confidentiality and legal restrictions. It may not be able to disclose another person's personal information or disciplinary outcome. A worker dissatisfied with the response can raise the matter with the Chair or an appropriate external body; internal stages need not be exhausted before a qualifying external disclosure.

Protection, confidentiality and anonymous concerns

The School prohibits dismissal, threats, bullying, disadvantage or other retaliation for raising a concern. A worker who believes they have suffered detriment should tell an unimplicated senior leader or governor promptly; the School will address it separately from the underlying concern. A disclosure that is not substantiated does not of itself mean the worker acted improperly. Knowingly false allegations may be addressed under the disciplinary procedure, with the facts and legal protections considered carefully.

The School will protect the reporter's identity as far as practicable, share information only with those who need it, and explain if disclosure becomes necessary for an investigation, safeguarding or legal process. It will

consider anonymous concerns on their merits, taking account of the detail supplied and the ability to investigate. Anonymity may limit feedback or follow-up, but does not justify ignoring a credible risk.

External advice and disclosures

A worker may seek confidential advice from their trade union or legal adviser. Disclosures to an appropriate prescribed person may qualify for statutory protection if the conditions are met, including reasonable belief that the matter falls within that body's remit and that the information is substantially true. Other wider disclosures have more restrictive conditions; workers may wish to seek independent advice. The School will not imply that staff must exhaust internal procedures before contacting an appropriate body.

Child welfare and protection: NSPCC Whistleblowing Advice Line, 0800 028 0285, help@nspcc.org.uk. Current opening times and contact arrangements are on the NSPCC website.

Education matters concerning independent schools: Secretary of State for Education, through the Department for Education. Use the current GOV.UK list of prescribed people and bodies to identify the right recipient for a particular matter.

Immediate risk to a child: children's social care or police. Allegations about adults posing a risk of harm to children: the local authority LADO route where indicated by the safeguarding procedures.

Training, monitoring and review

The Headmaster and Governing Body will make this policy accessible to all workers, including temporary staff and contractors, and ensure managers know how to receive and escalate a concern. The Governing Body will review anonymised themes and actions without compromising confidentiality, and review this policy at least annually or sooner after legal or safeguarding changes.

Reviewed: July 2019, June 2020, June 2021, June 2022, June 2023, June 2024, September 2026
Next Review date: June 2027
Person responsible: Duncan Sinclair, Headmaster; Mark Parton, Deputy Head and DSL