



ST JOHN'S SCHOOL
SIDMOUTH, UNITED KINGDOM

Whistleblowing Policy

Policy owner: Head of School

Approved by: Directors

Applies to: Whole school, including EYFS, Junior School, Senior School, boarding, staff, volunteers, supply staff, agency staff, contractors, self-employed staff, peripatetic staff, Directors and others working on behalf of the school

Reviewed: June 2026

Next review due: June 2027

Purpose

St John's School is committed to safeguarding and promoting the welfare of all pupils.

The school is also committed to openness, accountability, integrity and high standards of conduct.

The purpose of this policy is to ensure that workers can raise genuine concerns about wrongdoing, risk, malpractice, unsafe practice or failures in safeguarding and be confident that concerns will be taken seriously.

This policy supports a culture in which staff and others working with the school feel able to speak up without fear of reprisal, victimisation or detriment.

Detailed internal contact lists, named role holders and operational reporting procedures are held separately in staff-only procedures and are not included in this policy.

Nothing in this policy should delay immediate action where a pupil may be at risk of harm.

Legal and guidance framework

This policy has been prepared with regard to:

- Public Interest Disclosure Act 1998
- Employment Rights Act 1996
- Keeping Children Safe in Education
- Working Together to Safeguard Children
- Education (Independent School Standards) Regulations 2014
- National Minimum Standards for Boarding Schools
- Statutory framework for the Early Years Foundation Stage
- Equality Act 2010
- UK GDPR and Data Protection Act 2018

This policy should be read alongside the school's Safeguarding and Child Protection Policy, Staff Code of Conduct, Low-Level Concerns Policy, allegations management procedures,

Complaints Policy, Grievance Policy, Disciplinary Policy, Data Protection Policy and Records Retention Schedule.

Scope

This policy applies to workers and others working with or for the school, including:

- Employees
- Temporary staff
- Fixed term staff
- Supply staff
- Agency staff
- Contractors
- Self-employed staff
- Peripatetic staff
- Volunteers
- Visitors working with the school
- Directors

For the purposes of legal whistleblowing protection, the term worker has the meaning given in relevant employment legislation.

Some people who are able to raise concerns under this policy may not have statutory whistleblowing protection. This does not prevent the school from considering their concern seriously and taking appropriate action.

This policy is not primarily intended for pupil or parent complaints, staff grievances, disciplinary appeals or routine employment concerns. Those matters should usually be raised through the relevant school procedure.

Where a concern raised under another procedure includes information about wrongdoing, unsafe practice, safeguarding failure or malpractice, the school will consider whether it should also be treated as a whistleblowing concern.

What is whistleblowing?

Whistleblowing is the disclosure of information by a worker where they reasonably believe that the information tends to show wrongdoing, risk, malpractice or concealment of wrongdoing.

A concern may relate to something that has happened, is happening or is likely to happen.

Whistleblowing may include concerns about:

- A criminal offence
- Failure to comply with a legal obligation
- A miscarriage of justice
- Risk to health and safety
- Environmental damage
- Safeguarding failures
- Unsafe practice

- Financial malpractice
- Fraud
- Corruption
- Serious breach of school policy
- Abuse of authority
- Deliberate concealment of wrongdoing

This list is not exhaustive.

Concerns should be raised where the worker reasonably believes that the disclosure is in the public interest.

Safeguarding concerns

Safeguarding concerns must always be acted on promptly.

Where a concern relates to the safety or welfare of a pupil, staff must follow the Safeguarding and Child Protection Policy.

Where a concern relates to the conduct of an adult working with children, staff must follow the Managing Allegations procedures, Low-Level Concerns Policy or Staff Code of Conduct as appropriate.

Where a member of staff believes that safeguarding concerns are not being dealt with properly, that unsafe practice is being ignored or that there has been a failure in the school's safeguarding arrangements, they should use this policy to escalate the concern.

Nothing in this policy prevents a person from contacting children's social care, the LADO, the police, ISI, Ofsted, the NSPCC whistleblowing advice line or another appropriate external body where they reasonably believe this is necessary.

Principles

The school will:

- Take whistleblowing concerns seriously
- Respond promptly and proportionately
- Protect workers who raise concerns from victimisation or detriment
- Respect confidentiality as far as possible
- Act in the best interests of pupils
- Investigate concerns fairly
- Keep appropriate records
- Report to external bodies where required
- Learn lessons where concerns are upheld
- Take appropriate action where wrongdoing is identified

A worker does not need to prove that wrongdoing has occurred before raising a concern.

Concerns should be raised honestly, reasonably and in the public interest.

Responsibilities

The Head of School has overall responsibility for this policy.

The Directors have oversight of whistleblowing arrangements.

The President and Vice President provide the senior governance escalation route where a concern involves the Head of School, where the worker does not feel able to raise the concern with the Head of School, or where the worker believes the concern has not been addressed appropriately.

The safeguarding governor provides oversight where concerns relate to safeguarding, pupil welfare, low-level concerns or allegations against adults. Where a concern involves the Head of School and relates to safeguarding or pupil welfare, the safeguarding governor should normally be alerted.

Senior leaders are responsible for ensuring that concerns raised with them are handled appropriately and escalated where required.

All workers are responsible for raising genuine concerns promptly.

No person may victimise, disadvantage, threaten or penalise a worker for raising a genuine whistleblowing concern.

How to raise a concern

A concern should normally be raised with the Head of School.

Where the concern involves the Head, the concern should be raised with the safeguarding governor, President or Vice President.

Where the concern involves the Head and relates to safeguarding, pupil welfare, low-level concerns, allegations against adults or unsafe safeguarding practice, the safeguarding governor should be alerted unless there is a clear conflict of interest or doing so would create an immediate safeguarding risk.

Where the concern may meet the harm threshold, advice should be sought from the LADO in accordance with the Safeguarding and Child Protection Policy.

Workers may also raise a concern through the school's secure whistleblowing channel:

https://whistleblowersoftware.com/secure/SJS_IES

If any wording displayed on the secure reporting platform differs from this policy, this policy takes precedence.

The secure whistleblowing channel may be used where a worker wishes to raise a concern confidentially, where they do not feel able to raise the concern directly with a senior member of staff, or where they believe the matter has not been addressed appropriately.

Where the concern relates to safeguarding and the worker believes the usual safeguarding route is not appropriate or has not been effective, the concern should be raised with the Head

of School, safeguarding governor, President, Vice President, secure whistleblowing channel or an appropriate external body.

Concerns may be raised orally or in writing.

A written concern should normally include:

- The nature of the concern
- Relevant dates
- Relevant people involved
- What the worker believes has happened or may happen
- Any evidence or supporting information
- Whether the concern has already been raised
- Any immediate risk to pupils, staff or others

Workers should not delay raising a concern because they do not have all the evidence.

Confidentiality

The school will treat whistleblowing concerns sensitively and will protect the identity of the worker as far as possible.

There may be circumstances where the worker's identity needs to be shared, for example to investigate the concern properly, comply with legal duties, protect pupils or respond to external agencies.

Where this is necessary, the school will discuss the position with the worker where appropriate.

Anonymous concerns

The school encourages workers to put their name to concerns where possible, because this makes it easier to investigate and provide support.

Anonymous concerns will still be considered.

In deciding how to respond to an anonymous concern, the school will consider:

- The seriousness of the concern
- Whether pupils or others may be at risk
- The credibility of the concern
- Whether the concern can be investigated
- Whether other information supports the concern

External disclosures

The school encourages workers to raise concerns internally where appropriate so that they can be addressed quickly.

However, workers may make a protected disclosure to a prescribed person or appropriate external body where the legal requirements are met.

The current GOV.UK list of prescribed persons and bodies is available here:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>

External bodies may include, depending on the nature of the concern:

- Local Authority Designated Officer
- Children's social care
- Police
- ISI
- Ofsted
- Health and Safety Executive
- Information Commissioner's Office
- A prescribed regulator or public body

Workers may also seek independent advice from a trade union, legal adviser, Acas, Citizens Advice or a recognised whistleblowing advice service.

Investigation and response

The school will respond to whistleblowing concerns promptly and proportionately.

The response may include:

- Initial discussion with the worker
- Urgent safeguarding action
- Referral to the DSL, LADO, police or children's social care
- Internal investigation
- External investigation
- Review of documents or records
- Interviews with relevant people
- Suspension or precautionary action where appropriate
- Referral to regulators or statutory bodies
- Action under disciplinary, capability, safeguarding or other procedures
- No action, where the concern is not substantiated or does not require further steps

The worker will be told who is handling the concern and will receive appropriate updates, subject to confidentiality and legal constraints.

The school may not be able to share all details of an investigation or outcome.

Protection from victimisation

The school will not tolerate victimisation, harassment, bullying, intimidation or disadvantage of a worker because they have raised a genuine whistleblowing concern.

This protection applies whether or not the concern is ultimately upheld, provided the worker raised the concern honestly and reasonably and believed it was in the public interest.

Any person who victimises a worker for raising a concern may be subject to disciplinary or other appropriate action.

False or malicious allegations

The school recognises that a concern may be mistaken without being malicious.

No action will be taken against a worker simply because a genuine concern is not upheld.

However, deliberately false, malicious or vexatious allegations may be treated as a disciplinary matter.

Confidentiality clauses and settlement agreements

Nothing in any school contract, confidentiality agreement, settlement agreement or non-disclosure agreement prevents a worker from making a protected disclosure.

Workers should seek independent advice where they are unsure whether a disclosure is protected.

Record keeping

The school will keep a record of whistleblowing concerns and the action taken.

Records may include:

- Date concern was raised
- Person receiving the concern
- Nature of the concern
- Immediate action taken
- Investigation steps
- External agencies contacted
- Outcome
- Action taken
- Lessons learned
- Reporting to Directors

Records will be kept securely and in accordance with the Data Protection Policy and Records Retention Schedule.

Safeguarding, child protection or welfare concerns will be recorded on CPOMS where appropriate.

Administrative, staffing and communication records may be held on the school's secure systems where appropriate.

Reporting to Directors

The Head of School will report whistleblowing matters to the Directors in a proportionate way.

Reports will protect confidentiality where possible.

Where the concern involves the Head of School, reporting will be managed by the President, Vice President or another appropriate Director.

The Directors will use whistleblowing information to support oversight, assurance and improvement.

Support for workers

Workers who raise a concern may be offered appropriate support.

Support may include:

- A named contact
- Regular updates where appropriate
- Advice about the process
- Signposting to external advice
- Welfare support
- Protection from victimisation
- Adjustments to working arrangements where needed

Workers may seek advice from a trade union, professional association, legal adviser, Acas, Citizens Advice or recognised whistleblowing advice service.

Monitoring and review

The Head of School has overall responsibility for this policy.

The Directors will maintain oversight of whistleblowing arrangements.

The President, Vice President and safeguarding governor will support oversight where concerns relate to governance, safeguarding or pupil welfare.

The school will monitor whistleblowing concerns to identify themes, risks, lessons learned and any need for policy or procedural change.

This policy will be reviewed annually, or sooner following a significant concern, change in law, change in guidance, inspection finding or change in school provision.