

# NEWLANDS GIRLS' SCHOOL

## POLICY DOCUMENT



# Raising Concerns at Work Policy Whistleblowing

LAST UPDATED AND REVIEWED	(by) School Business Manager	March 2026
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POLICY TYPE	Statutory
REVIEW FREQUENCY	Bi-annually

RESPONSIBLE	
Leadership Team	School Business Manager
Governing Committee	FGB

APPROVED/MEETING	FGB	09/03/2026
UPDATED: Shared Drive Website (if applicable)		

**Courage      Commitment      Compassion**

## **Statement of Intent**

Newlands Girls' School is committed to open and honest communication and ensuring the highest possible standards in integrity – we will always treat whistleblowing as a serious matter.

In line with the school's commitment to openness, probity and accountability, members of staff are encouraged to report concerns. This policy will work to ensure that, if an employee sees or suspects that something is wrong, they will raise this with the school. This is known as "blowing the whistle" – a phrase that is used throughout this policy and should be viewed as a positive action of speaking up.

This policy seeks to ensure that any member of staff who suspects malpractice knows how to raise concerns and what procedures are in place to deal with the concern.

Where this policy necessitates personal or special category data to be processed, it will be done so in accordance with the school's Data Protection Policy. This policy will not be confused with the procedure on dealing with harassment at work or the school's Grievance Policy and Disciplinary Policy and Procedure.

This policy will:

- Give confidence to members of staff when raising concerns about any suspected danger or wrongdoing which is inconsistent with school standards and policies.
- Provide members of school staff with appropriate pathways and avenues to raise concerns.
- Ensure that members of staff receive a response to the concerns they have raised and feedback on any action taken where appropriate.
- Offer assurance that members of staff are protected from reprisals or victimisation for whistleblowing action within the meaning of the Public Interest Disclosure Act (PIDA).

Under this policy, any of the following can raise a concern:

- Employees of the school
- Voluntary workers working with the school
- Trainees, such as student teachers

## **1. Legal Framework**

This policy has due regard to all relevant legislation and guidance including but not limited to, the following:

- Public Interest Disclosure Act 1998 (PIDA)
- Employment Rights Act 1996
- DfE: Academy Trust Handbook 2025
- DfE: Keeping Children Safe in Education 2025
- GOV.UK: Whistleblowing for Employees
- DfE: Whistleblowing: Guidance for Prescribed Persons
- DfE: Blowing the Whistle to the Department for Education

- Department for Business, Energy and Industrial Strategy and Department for Business and Trade, Whistleblowing: Guidance and Code of Practice for Employers
- Sir Robert Francis (2015) 'Freedom to speak up report'

## 2. The Public Interest Disclosure Act

The Public Interest Disclosure Act 1998 (PIDA) protects employees who “blow the whistle” where the employee reasonably believes that the disclosure falls within the remit of the prescribed person or body, and that the information and any allegations are substantially true. Disclosures made under this procedure will be monitored for statistical purposes as required under the PIDA. Under PIDA, a disclosure can still be protected even if the whistleblower is partly motivated by personal reasons, provided the information is in the public interest and meets the statutory tests. The details of any disclosure will remain confidential.

The headteacher is the first point of contact for whistleblowing queries. If the allegation is related to the headteacher, the concern will be raised with the chair of governors.

Any member of the school community or the general public is able to “blow the whistle”; however, the PIDA only protects employees. The non-employee’s section of this policy includes further details on how whistleblowing affects those who are not employed by the school.

## 3. Definitions

**Whistleblowing** is the term used to describe the disclosure of information by a worker which relates to suspected wrongdoing, malpractice or dangers at their place of work.

A **whistleblower** is a worker who reports certain types of wrongdoing in the public interest, they are protected by law.

As outlined by the PIDA, a **Qualifying Disclosures** pertain to when any of the following takes place:

- A criminal offence has been committed, is being committed or is likely to be committed
- That a person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject
- That a miscarriage of justice has occurred, is occurring or is likely to occur
- That the health or safety of any individual has been, is being or is likely to be endangered
- That the environment has been, is being or is likely to be damaged
- That information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed

A **Protected disclosure** is a qualifying disclosure as defined above.

For a **qualifying disclosure** to be **protected** it must be made by a worker using one of the following permitted methods of disclosure:

- To the employer or the person responsible for the issue.

- To a legal advisor (for confidential advice).
- A Government Minister.
- A prescribed person or body e.g. a person appointed by the Secretary of State.
- Other disclosures may be protected where in the particular circumstances they are either reasonable, or special provision is made for disclosures relating to exceptionally serious problems.

A worker who blows the whistle, by making a disclosure in accordance with the relevant criteria set out is making a protected disclosure and has the right not to be unfairly dismissed or suffer a detriment, e.g. being dismissed or being denied a promotion as a result of having made that disclosure.

**Worker:** defined by section 230(3) of the Employment Rights Act 1996 as: ‘an individual who has entered into or works under (or, where the employment has ceased, worked under):

- A contract of employment.
- Any other contract, whether express or implied and (if it is express) whether oral or in writing, oral or in writing, whereby the individual undertakes to do or perform personally any work or services for another party to the contract whose status is not by virtue of the contract that of a client or customer of any profession or business undertaking carried on the individual.

In relation to protected disclosures, section 43k of the PIDA 1998 provides an extension to the definition of a worker, this includes certain agency workers and trainees.

**Prescribed person:** If an individual decides to blow the whistle to a prescribed person rather than the school, they must make sure that they choose the correct person or body for their issue. The Public Interest Disclosure (Prescribed Persons) Order 2014 sets out a list of over 60 organisations and individuals that a worker may approach outside their workplace to report suspected or known wrongdoing. The organisations and individuals on the list have usually been designated as prescribed persons because they have an authoritative or oversight relationship with their sector, often as a regulatory body. An up-to-date list for the education sector can be found [here](#); there is also a brief description about the matters that can be reported to each prescribed person.

**In the public interest:** means that it must affect others, e.g. the general public / people at large.

**Blacklisting:** refers to an individual who is being refused work because they are viewed as a whistleblower.

**Grievances:** involve an individual filing a complaint relating to their own personal circumstances, such as the way they have been treated at work. Workers who make a disclosure under this whistleblowing policy should believe that they are acting in the public interest – personal grievances and complaints do not usually count as whistleblowing.

#### 4. Roles and Responsibilities

The governing body will be responsible for:

- Establishing and agreeing the whistleblowing procedure
- Ensuring the agreed whistleblowing procedure is published on the trust's website
- Monitoring the effectiveness of this policy and undertaking any necessary reviews, e.g. in relation to good practice recommendations or changes in legislation
- Ensuring all members of the school community have access to this policy
- Investigating, in liaison with the headteacher, any concerns that are raised
- Ensuring this policy provides an open and transparent framework where workers of the school can raise their concerns
- Taking the necessary action against members of staff following an investigation into any alleged malpractice
- Ensuring that the minutes of the governing board include a record of the school's whistleblowing arrangements and who, both internally and externally, staff members should report concerns to
- Appointing one governor and one member of staff to act as points of contact for staff members when reporting concerns
- Ensuring that all concerns raised by whistleblowers are responded to properly and fairly
- Ensuring that whistleblowing forms part of the staff behaviour policy as part of a wider approach to having in place appropriate safeguarding policies and procedures

The chair of governors will be responsible for receiving any concerns raised about the headteacher.

The Headteacher will be responsible for:

- Ensuring all members of staff have read and understood this policy
- Receiving, investigating and responding to any concerns that have been raised by school staff, unless the concern is about the Headteacher
- Being the first point of contact regarding whistleblowing

All members of staff will be responsible for:

- Disclosing any suspected danger or wrongdoing. Raising any concerns that meet the definitions in the 'Definitions' section of this policy
- Raising genuine concerns relating to the specified situations covered by the PIDA
- Not raising false allegations maliciously

## **5. Harassment and victimisation of staff**

The school recognises that the decision to report a concern can be a difficult one to take, not least because of the fear of reprisal from those responsible for the malpractice or from the school as a whole. The school aims to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Staff are protected in law by the PIDA which gives employees protection from any detrimental treatment as a result of raising a concern. If a staff member believes that they have suffered any such treatment, they should follow the school's Grievance Policy.

Any member of staff who victimises or harasses a member of staff as a result of their having raised a concern in accordance with this policy will be dealt with under the school's Disciplinary Policy and Procedure.

## **6. Non-Employees**

The PIDA and the Employment Rights Act 1996 do not protect non-employees as far as whistleblowing is concerned. Irrespective of this, the school will not allow harassment, dismissal or exclusion for any non-employee who raises a genuine concern.

Where an individual feels that they have been unfairly treated following blowing the whistle, they should make a complaint under the school's Complaints Policy.

Governors are not employees and, while they are responsible for ensuring there is a whistleblowing procedure in place, they are not protected under the PIDA.

## **7. Good Practice Principles**

The school will implement the core whistleblowing principles as outlined in the 'Freedom to speak up report' to ensure that whistleblowing procedures are fair, clear and consistent.

The school will implement a culture of change by ensuring the following principles are reflected in our ethos and values – there will be a culture:

- Of safety at school
- Where people feel confident with raising concerns
- Free from bullying
- Of visible leadership
- Of valuing staff
- Of reflected practice

By providing a clear procedure for mediating and resolving cases, as outlined in the 'Procedure' section of this policy the school will ensure that all cases are efficiently handled. This procedure includes:

- How to raise and report concerns
- How investigations will be conducted
- How the school will mediate and resolve disputes

The school will implement measures to support good practice by ensuring adherence to the following principles:

- Offering relevant training to staff via the [National College](#)
- Providing the necessary support to staff
- Being transparent
- Being accountable

- Conducting an external review of any concerns raised, where necessary
- Undertaking regulatory action as required
- Informing staff what protection is available to them if they report any suspected wrongdoing or dangers at work
- Ensuring that alternative whistleblowing channels are in place for members of staff who feel unable to raise an issue with their employer

The school will ensure there are particular support measures in place for vulnerable groups by adhering to the following principles.

- Ensuring non-permanent staff are taught, and receive training on, the same principles as permanent staff
- Ensuring trainees are subject to all the safeguarding and whistleblowing principles
- Ensuring staff are empowered and protected, enabling them to raise concerns freely.

## 8. Procedure

When raising concerns, individuals will express them in writing to the headteacher. If an individual is raising a concern about the headteacher, they should express their concerns in writing to the chair of governors. Where this is the case the chair of governors will take on the headteacher's duties outlined in the Interview and Investigation section of this policy.

When individuals raise their concern, they will include the following information as far as possible:

- The background and history of the concern
- Any relevant names, dates and places
- The reasons for the concern

The school encourages individuals to let their identity be known when they raise concerns, as anonymous concerns can be challenging to investigate. Anonymous disclosures may still constitute protected disclosures if later linked to a worker.

Individuals who would like to seek professional and confidential advice should contact Protect, a registered charity that advises on whistleblowing queries. The Protect website can be accessed [here](http://www.protect-advice.org.uk) ([www.protect-advice.org.uk](http://www.protect-advice.org.uk)), or they can be contacted on 020 3117 2520.

Once an individual has raised a concern, the school will be responsible for investigating it. In certain circumstances, it may be appropriate for the individual to raise the concern with an outside agency, e.g. the police, depending upon the severity of the concern. Equally, it may be appropriate for the individual to request that their trade union raises the matter.

If a member of staff feels they should report a concern to the DfE they should use the online contact form [here](http://www.gov.uk/contact-dfe) ([www.gov.uk/contact-dfe](http://www.gov.uk/contact-dfe)).

Appropriate whistleblowing procedures will be put in place for concerns about poor or unsafe practice and potential failures in the school's safeguarding system to be raised with the SLT.

If any member of staff feels like they are unable to raise a safeguarding-related concern with the school or feels that their genuine concerns are not being addressed, they are able to contact the NSPCC Whistleblowing Helpline on 0800 028 0285, email [help@nspcc.org.uk](mailto:help@nspcc.org.uk) or the LADO on 07774 332 675. A list of other prescribed people and bodies can be accessed [here](#).

The school or the appropriate external agency, will acknowledge receipt of a disclosure but, unless additional information is required, will not contact or engage in dialogue with the whistleblower, as this may undermine the legitimacy of the investigation outcome.

## **9. Interview and Investigation**

The headteacher will write to the individual within 10 working days of the initial meeting to confirm that the concern has been received, as well as to indicate proposals for dealing with the matter.

The initial stage will be an interview with the whistleblower, and then an assessment of further action will be discussed. During this initial stage, the headteacher will establish if:

- There are grounds for concern and that it is genuine
- The concern was raised in accordance with this policy

During the initial interview, the headteacher will request the individual puts their concern in writing, if they have not already done so. The headteacher will explain the following to anybody raising a concern:

- How they will communicate with the complainant throughout the process. It should be noted, the need for confidentiality may prevent the school giving the complaint specific details of any necessary investigation or any necessary disciplinary action taken as a result of the concern
- That the complainant's identity will be kept confidential from the alleged wrongdoer
- That the governing body will do everything in its power to protect the complainant from discrimination
- That if the concern is genuine, even if the concern is not confirmed, no disciplinary action will be taken against the complainant.

If clear evidence is uncovered that the complainant's concern is malicious or unfounded, disciplinary action may be brought against them.

If an investigation is carried out, the whistleblower will be informed of the final outcome.

A record will be kept of the seriousness of the issues raised and the credibility of the concern. All records will be kept confidential and will be stored in line with IRMS recommendations.

It may be possible for the concern to be resolved by simply agreeing the necessary action or explaining procedures to the alleged wrongdoer; however, depending on the severity and nature of the concern, it may:

- Be investigated by management, an internal audit or through the disciplinary process
- Be referred to the police or an external auditor
- Form the subject of an independent inquiry

If the investigating officer needs to talk to the whistleblower, they are permitted to be accompanied by a trade union representative, a friend or a fellow member of staff not involved in the area of work that the concern relates to. The person will provide support only and will not be allowed to become involved in the proceedings.

A record will be made of the nature and outcome of the concern. The purpose of this is to ensure that a central record is kept which can be cross-referenced with other complaints to monitor any patterns of concern across the school and to assist in monitoring the procedure.

The whistleblower will be informed of the results of the investigation, and any action that is proposed will be subject to third party rights . Where action is not taken, the individual will be given an explanation.

#### **10. What the school asks of whistleblowers**

The purpose of this policy is to enable individuals to raise concerns in confidence, without any fear of reprisal. It is important that whistleblowers:

- Do not talk about the concern outside the school unless it is to report the concern through the proper external channels.
- Declare any personal interest in the matter, as the policy is designed to be used in the interest of the public and not for individual matters.

#### **11. Appeal process**

If no action is to be taken and/or the individual is not satisfied with the way the matter has been handled, they can make a complaint under the school's Complaints Policy.

#### **12. Unfair Treatment**

An individual can take a case to an employment tribunal if they feel that they have been treated unfairly as a result of whistleblowing. Further information can be sought from the [Citizen's Advice Bureau](#), the whistleblowing charity [Protect](#), or from an individual's trade union.

#### **13. Record keeping and data protection**

Records of all written and oral communications received and conducted through the course of the disclosure and subsequent investigations will be kept in line with the school's Records Management Policy.

Where this policy necessitates personal or special category data to be processed, it will be done so in accordance with the school's Data Protection Policy.

## Named Contacts

School Contacts	Telephone Number	Email Address
Headteacher - Jo Capon	07980 287032	jocapon@newlandsgirls.co.uk
Deputy Headteacher – Lesley Allaway	07825 412342	lesleyallaway@newlandsgirls.co.uk
Deputy Headteacher – Andrew Morbey	07866 254268	andrewmorbey@newlandsgirls.co.uk
Assistant Headteacher - Suzanne Nuttycombe	07843 666708	suzannenuttycombe@newlandsgirls.co.uk
Assistant Headteacher - Justin O'Connell	07969 266870	Justino'connell@newlandsgirls.co.uk
Assistant Headteacher – Kate Kalinowski	TBA	katekalinowski@newlandsgirls.co.uk
Assistant Headteacher – Charlie Bevan	07935 932249	charliebevan@newlandsgirls.co.uk
School Business Manager – Kate Foreman	07721 890275	kateforeman@newlandsgirls.co.uk
Chair of Governors – Simon Baker	07775 727361	simonbaker@newlandsgirls.co.uk
Vice Chair of Governors – Guy van der Knaap	07921 049577	guyvanderknaap@newlandsgirls.co.uk