

Ironstone Academy Trust:

Nunthorpe Primary Academy

CONFIDENTIAL REPORTING AND WHISTLEBLOWING POLICY

2026 – 2027

(ACADEMIC YEAR)

Foreword, Introduction	<u>3</u>
Purpose & Aim	<u>4</u>
What is Whistleblowing?	<u>4</u>
Raising a Whistleblowing Concern (Non-Safeguarding)	<u>5</u>
The Chair of Governors/Governor with Responsibility for Whistleblowing Matters	<u>6</u>
Confidentiality	<u>6</u>
Concerns against Governors	<u>7</u>
External Disclosures	<u>7</u>
Investigation & Outcomes	<u>8</u>
Protection & Support for ‘Whistleblowers’	<u>9</u>
Keeping Children Safe (Raising a Safeguarding Concern)	<u>10</u>
GDPR	<u>10</u>

Foreword

This policy has been created by Helen Hogan: Safeguarding Matters and adapted by Ironstone Academy Trust to provide clarity to all staff in school around the expectations of raising concerns and allegations against adults working with children in the prevention of harm to children.

Introduction

Nunthorpe Primary Academy is committed to ensuring that all employees and stakeholders behave with honesty and integrity and expect all staff to maintain high standards in accordance with their contractual obligations and the school's policies and procedures particularly operating within the school's Staff Behaviour Policy/Code of Conduct.

However, all schools may face things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. **A culture of openness, accountability and vigilance from all staff** is essential in order to prevent such situations occurring or to address them when they do occur.

This policy is not a substitute for normal line management processes but an addition to them. Staff should always first consider using normal line management for raising concerns particularly around issues to do with curriculum or general day-to-day school life. The line manager should always inform the Headteacher of any actions taken. When the issue is regarding someone's conduct with children this **MUST** be shared directly with the Headteacher. This policy is only for the purpose of raising concerns about wrongdoing and is not a substitute or alternative for existing procedures such as the Grievance, Disciplinary Procedures for staff or the complaints procedure.

This policy should only be used where all other existing internal procedures are felt to be inappropriate or when a member of staff, for whatever reason, feels inhibited in going through normal line management. As an example, therefore, if a member of staff has a personal grievance, then it must be raised through the grievance procedure. The existence of this policy does not prevent staff from raising concerns through their trade union if they wish. The policy is therefore not a route through which employees can raise concerns about mismanagement which may arise from weak management rather than malpractice.

Purpose and Aim

- To encourage and ensure staff reports suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide staff with guidance as to how to raise those concerns.

- To reassure staff that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.
- To ensure that all staff feel safe to raise any issue on a continuum of concern (including low-level concerns) immediately and directly to the Headteacher.

This policy takes account of the information provided on the website Protect - speak up stop harm. <https://protect-advice.org.uk/>

Under The Public Interest Disclosure Act (PIDA) 1998, workers are protected from dismissal or other detriment as long as they follow their employer's whistleblowing procedure. Any investigations arising from whistleblowing will not influence or be influenced by any other procedures to which an employee may be subject.

This policy does not form part of an employee's contract of employment and is not intended to have contractual effect. It is provided for guidance to all members of staff at Nunthorpe Primary Academy and the school reserve the right to amend its content at any time.

This policy reflects our school's current practices and applies to all individuals working at all levels of the organisation, including the Governors, Headteacher, members of the Senior Leadership Team, employees, consultants, contractors, trainees, part-time and fixed-term workers, casual and agency staff (collectively referred to as "staff" in this policy) and volunteers who are advised to familiarise themselves with its content.

What is Whistleblowing?

Whistleblowing is when an employee or volunteer raises concerns about poor or unsafe practice, misconduct and/or potential failures in the school's systems and processes. The wrongdoing disclosed must be in the public interest. This means it must affect others, e.g., pupils, general public. The wrongdoing must relate to or show one of the following:

- a criminal offence
- a failure to comply with a legal obligation
- a possible miscarriage of justice
- a Health & Safety risk
- actions causing, or likely to cause damage to the environment
- misuse of public money
- corruption or unethical conduct
- failing to safeguard and promote the welfare of children
- deliberate concealment of any of these matters
- any other substantial and relevant concern

The concern could be about something that happened in the past, is currently happening or likely to happen in the future. Concerns or complaints that employees wish to raise

formally, about their own employment, should normally be raised using the school's Grievance Procedure, unless the employee believes the concern is in the public interest. This includes for example, concerns related to working conditions, working relations, employment rights or bullying or harassment

A 'whistleblower' is a person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the school's activities (a whistleblowing concern) you should report it under this policy.

If staff are uncertain whether something is within the scope of this policy, they should seek advice from the Headteacher and if the matter is in relation to an alleged wrongdoing by the Headteacher then staff should inform the Chair of Governors. The Headteacher advice may be sought at any time and the line manager who may receive information first regarding another member of staff must always keep the Headteacher informed of any actions taken.

Raising a Whistleblowing Concern (Non-Safeguarding)

In Nunthorpe Primary Academy, all staff must raise any concerns with their Line Manager, speaking to them in person or putting the matter in writing if they prefer. They may be able to agree on a way of resolving a concern quickly and effectively. In some cases, they may refer the matter to the Governing Body.

However, where the matter is more serious, or you feel that your Line Manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

The Headteacher

The Chair of Governors/Governor with Responsibility for Whistleblowing Matters

The Headteacher will arrange a meeting with the ‘whistleblower’ as soon as practicable to discuss their concern. They will record sufficient details to enable the matter to be thoroughly investigated. As a minimum the Headteacher will record the name of the employee but also indicate whether the individual wishes his or her identity to remain confidential, if possible and the nature of the concern. In some cases, it will not be possible to maintain confidentiality and the Headteacher should explain this to the employee. In such instances the employee will have the choice of either withdrawing or agreeing to his/her identity becoming known to enable the concern to be effectively dealt with.

Staff may bring a colleague or trade union representative to any meetings under this policy who must respect the confidentiality of the disclosure and any subsequent investigation.

The school will take notes and produce a written summary of the concern raised and provide the ‘whistleblower’ with a copy as soon as practicable after the meeting. The school will also aim to give the “whistleblower” an indication of how it proposes to deal with the matter.

Confidentiality

In Nunthorpe Primary Academy our staff should feel able to voice whistleblowing concerns openly under this policy. However, if a member of staff wants to raise his or her concern confidentially, the school will endeavor to keep his or her identity confidential in so far as it is possible to do so when following this policy and procedure. If it is necessary for anyone investigating that member of staff's concern to know the 'whistleblower's' identity, the school will discuss this with the member of staff first.

The school does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if the school cannot obtain further information. It is also more difficult to establish whether any allegations are credible and have been made in good faith. 'Whistleblowers' who are concerned about possible reprisals if their identity is revealed, should come forward to one of the contacts listed above and appropriate measures can then be taken to preserve confidentiality.

If an individual misuses the policy and procedure e.g., by making malicious or repeated unsubstantiated complaints against colleagues this could give rise to action under the school's Disciplinary Procedure. If the Headteacher knows or has a suspicion that an employee comes into this category, then s/he will take advice from the Chair of Governors who will help to determine what action should be taken.

If you are in any doubt, you can seek advice from Protect - speak up stop harm, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are:

Protect - Speak Up Stop Harm

Helpline **020 3117 2520**

Website <https://protect-advice.org.uk/>

Concerns Against Governors

If a concern against a Governor is received, then this will be treated in the same way as any other concern. It will receive the same serious consideration. The concern will be raised to the Headteacher with the Chair of Governors who will decide how it should be dealt with.

If the concern is against the Chair of Governors, then clearly this process cannot be followed. In such circumstances, the concern will be taken directly to the Headteacher who will decide in consultation with the Governor with responsibility for Whistleblowing matters (if this is not the Chair of Governors), how it should be dealt with. In normal circumstances such a concern would be referred to the Department for Education for action.

External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases staff should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for staff to report their concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. All staff are encouraged to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline and holds a list of prescribed regulators for reporting certain types of concern.

Whistleblowing concerns usually relate to the conduct of school staff, but they may sometimes relate to the actions of a third party, such as a service provider. The law allows staff to raise a concern in good faith with a third party, where the member of staff reasonably believes it relates mainly to their actions or something that is legally their responsibility. However, staff are encouraged to report such concerns internally first. Staff should contact one of the other individuals set out above for guidance.

If the matter of whistleblowing is against the 'regime' in school and therefore cannot be managed by senior leaders, then 'whistleblowers' are advised to contact their Local Authority Designated Officer in the first instance. OFSTED may also be contacted directly.

His Majesty's Chief Inspector of Education, Children's Services and Skills (the Chief Inspector) about matters relating to the regulation and inspection of establishments and agencies for children's social care services.

OFSTED
Piccadilly Gate
Store Street

Manchester
M1 2WD
0300 123 3155
Email: whistleblowing@ofsted.gov.uk

If there is an issue of an exceptionally serious nature which you believe to be substantially true, then you may disclose the issue to the above-named organisations. In determining whether it is reasonable for you to have made a disclosure, the identity of the person to whom the disclosure is made will be taken into account. You have a duty to the school not to disclose confidential information. This does not prevent you from seeking independent advice at any stage or from discussing the issue with the charity Protect on 020 3117 2520 or www.protect-advice.org.uk in accordance with the provisions of the Public Interest Disclosure Act 1998.

Investigation and Outcome

Once a member of staff has raised a concern, the school will carry out an initial assessment to determine the scope of any investigation. The school will inform the 'whistleblower' of the outcome of its assessment. The member of staff raising the concern may be required to attend additional meetings in order to provide further information.

In most cases a panel of three Governors will investigate any issue. In rare cases the school may appoint an investigator or team of investigators, including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable the school to minimise the risk of future wrongdoing.

The school will aim to keep the member of staff informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the school from giving specific details of the investigation or any disciplinary action taken as a result. The member of staff is required to treat any information about the investigation as strictly confidential.

If the school concludes that a 'whistleblower' has made false allegations maliciously, in bad faith or with a view to personal gain, the 'whistleblower' will be subject to disciplinary action under the School's Disciplinary Policy and Procedure.

Whilst the school cannot always guarantee the outcome a particular member of staff is seeking; the school will try to deal with the concern fairly and in an appropriate way. If a member of staff is not happy with the way in which his or her concern has been handled, he or she can raise it with one of the other key contacts outlined above.

There are no rights of appeal against any decisions taken under this procedure. However, an employee or the Headteacher will have the right to refer any particular case to the Chair of Governors for review.

Any member of staff raising a concern under the procedure will be kept informed of progress by the Headteacher, including, where appropriate, the final outcome. However, in certain circumstances, e.g., where disciplinary action under the School's Disciplinary Procedure has resulted from the concern, it may not be appropriate to provide specific details due to the confidentiality and sensitivity of such matters.

Protection and Support for 'Whistleblowers'

It is understandable that 'whistleblowers' are sometimes worried about possible repercussions. Our school aims to encourage openness and will support staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Staff must not suffer from any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment would include dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a member of staff believes that he or she has suffered any such treatment, he or she should inform the Headteacher immediately. If the matter is not remedied the member of staff should raise it formally using the School's Grievance Policy and Procedure.

Staff must not threaten or retaliate against 'whistleblowers' in any way. Anyone involved in such conduct will be subject to disciplinary action.

All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Headteacher in the first instance.

Keeping Children Safe (Raising a Safeguarding Concern)

Keeping Children Safe in Education (DfE 2026) outlines the framework that should be followed in all cases in which it is alleged that a teacher, other member of staff (including supply teachers and volunteers) in a school or college that provides education for children under 18 years of age has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

All issues that relate to the safety and well-being of children must be reported directly to the Headteacher. Staff are encouraged and expected to raise concerns about any behaviour, practice or incident that may place pupils or staff at risk, including concerns relating to safeguarding, online safety and the misuse of artificial intelligence. This includes reporting AI generated or manipulated content such as deepfakes, nudification images, impersonation attempts or digitally altered communication. If a member of staff suspects that there is a serious safeguarding issue that they feel that the Headteacher is not taking seriously or that they believe there is a serious safeguarding issue involving the Headteacher, they should in the first instance contact the Chair of Governors before seeking external support.

Concerns regarding adults' behaviour exist on a continuum and those behaviours that do not meet the 'harm threshold' for allegation (as bullet pointed above) but are still a cause of concern should still be reported to the Headteacher in exactly the same way and must not be minimised, dismissed or left unreported.

Further information regarding keeping children safe can be found in the school's Child Protection Policy.

The school is committed to a culture of openness, professional curiosity and transparency, and staff will be protected from detriment when raising concerns in good faith. All whistleblowing concerns will be recorded, reviewed and acted upon in line with KCSIE 2026 and local safeguarding partnership procedures.

GDPR

Any sharing of personal information must follow each school or setting's agreed protocols in relation to the General Data Protection Regulations. Information that places a child at risk of significant harm must be shared immediately and recorded in line with the school or setting's recording protocols and information sharing protocols. Anything which steps outside of the policy or places private information in a public arena would

be classified as a data breach and must be reported accordingly. See information sharing policy for further information.

This Policy should be read in conjunction with the school's:

Child Protection Policy

Staff Behaviour Policy/Code of Conduct inclusive of Low-Level Concerns Policy

Information Sharing Policy

Local Children Safeguarding Partnership Procedures