


High Grange

Adaptive thinking, Communication, Emotional wellbeing, Independence

Creating a Safe Environment		
Whistleblowing Policy		
Last Update: September 2025	Responsible: Principal	Page: 1 of 10

This policy promotes ACE because;	
	<p>A – Pupils will reflect on challenges they face, behavioural incidents and self-reflect. Pupils will raise a concern if they feel they have experienced any wrongdoing.</p> <p>C – Pupils will communicate with their emotionally available adults who they trust if they feel a victim of malpractice.</p> <p>E – Pupils will raise a concern if they feel staff have deliberately adversely impacted on their emotional well-being.</p>

Contents:

Statement of intent

1. Legal framework
2. Introduction
3. Definitions
4. Roles and responsibilities
5. Scope
6. Harassment and victimisation of staff
7. Non-employees
8. Good practice principles
9. Procedure
10. Next steps
11. What the school asks of you
12. Appeal process
13. Unfair treatment
14. Monitoring and review

Appendix

A. Whistle Blowing Procedure for Escalating Concerns

Statement of intent

High Grange 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.

1. Legal framework

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

- Public Interest Disclosure Act 1998
- Employment Rights Act 1996

This policy has been created with regard to the following guidance documents:

- DfE (2025) 'Keeping children safe in education 2025'
- DfE 2023 'working together to safeguard children' 2023
- GOV.UK (2012) 'Whistleblowing for employees'
- DfE (2014) 'Whistleblowing procedure for maintained schools'
- Sir Robert Francis (2015) 'Freedom to speak up report'

This policy operates in conjunction with the following school policies:

- Disciplinary policy and procedures
- Empowering resilience through ACE (behaviour policy)
- Complaints Procedures Policy
- Data Protection Policy

2. Introduction

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. The details of any disclosure will remain confidential.

The Principal and/or Deputy Headteacher is the first point of contact for whistleblowing queries. If the allegation is related to the Principal, the concern will be raised with the Board of Directors / Governors.

Any member of the school community or the general public is able to “blow the whistle”; however, the PIDA only protects employees. Section 7 includes further details on how whistleblowing affects non-employees.

3. Definitions

Whistleblowing is when a worker or other stakeholder raises a concern about wrongdoing, risk, malpractice or failures in the organisation that are in the public interest — for example: child protection failures, conduct that risks children's safety, criminal activity, serious misconduct, or covering up of wrongdoing. (See GOV.UK and DfE guidance on whistleblowing and whistleblowing disclosures.)

Qualifying disclosures: As outlined by the PIDA, qualifying disclosures pertain to when any of the following takes place:

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

In the public interests means that an individual acted outside of their own personal interest – they acted for more than personal gain. It is not necessary for the disclosure to be of interest to the entire public. The following considerations are often used as a test to establish whether something is within the scope of public interest:

- The number of people in the group whose interests the disclosure served
- The nature of the interests and the extent by which individuals are affected by the wrongdoing disclosed
- The nature of the wrongdoing disclosed
- The identity of the alleged wrongdoer

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

Grievances involve someone filing a complaint because they personally have been mistreated in some way – the person making the complaint will have a direct interest in the outcome. It is important to understand the difference between raising a grievance and blowing the whistle.

4. Roles and responsibilities

The Board of Directors will be responsible for:

- Establishing and agreeing the whistleblowing procedure.
- Ensuring the agreed whistleblowing procedure is published on the School'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 employees 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 Principal 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.
- Being the first point of contact regarding whistleblowing.

The Board of Directors will be responsible for receiving any concerns raised about the Principal.

All members of staff will be responsible for:

- Raising any concerns that meet the definitions of 3.2 and 3.3 of this policy.
- Being truthful and reasonable with any concerns that they have.
- Not raising malicious or unfounded concerns.

5. Scope

This policy will:

- Give confidence to members of staff when raising concerns about conduct or practice that is potentially illegal, corrupt, improper, unsafe or unethical, or which amounts to malpractice or is inconsistent with school standards and policies.
- Provide members of school staff with avenues to raise concerns.
- Ensure that members of staff receive a response to the concerns they have raised and feedback on any action taken.
- Offer assurance that members of staff are protected from reprisals or victimisation for whistleblowing action undertaken in good faith and within the meaning of the PIDA.

This policy will not be confused with the procedure on dealing with harassment at work or the school's Grievance and Disciplinary Policy.

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

- Employees of the school
- Voluntary workers working with the school
- A trainee, such as a student teacher

6. 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; however, the school will not tolerate any such harassment or victimisation and will take appropriate action to protect staff who raise a concern in good faith.

Staff are protected in law by the PIDA, which gives employees protection from detriment and dismissal where they have made a protected disclosure, providing the legal requirements of the Act are satisfied, e.g. the disclosure was in the public interest.

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.

7. Non-employees

The PIDA and the Employment Rights Act 1996 **do not** protect non-employees as far as whistleblowing is concerned.

Irrespective of 7.1, 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 Procedures 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.

8. Good practice principles

High Grange School believe that all staff have an important role to remain vigilant and promote best practise when working with vulnerable children and young people with special educational needs. The school will implement an open and supportive culture where staff can ask questions, enquire and where necessary take action to implement positive change. The school's senior leadership team have an 'open door' philosophy and welcome staff feedback through daily morning and afternoon handovers. At High Grange School we ensure the following principles are reflected in our ethos and values – there will be a culture where:

- **Anyone can raise a concern.** Concerns may be raised in good faith, anonymously (where possible), or with identity disclosed.

- **Protection from detriment.** Workers who make protected disclosures are legally protected (Public Interest Disclosure Act / employment law); the school will not tolerate victimisation. [GOV.UK](https://www.gov.uk)
- **Confidentiality.** The school will treat disclosures confidentially where possible, but may need to share information with investigators, agencies or the police if safety requires.
- **Speed and fairness.** Allegations will be handled promptly and objectively.
- **Record keeping.** Maintain secure records of concerns, actions taken and outcomes.
- **Support.** Provide support for whistleblowers, including access to employee assistance and trade union/HR/legal advice where appropriate.
- **Leadership.** The school SLT will be visible around the school, they will value staff and promote reflective practice with a focus on continuous improvement.

By providing a clear procedure for mediating and resolving cases, as outlined in section 9, 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
- Providing the necessary support to staff
- Providing support to staff who are seeking alternative employment
- 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 someone
- Ensuring that alternative whistleblowing channels are in place for members of staff who feel unable to raise an issue with their employer

We 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 from ethnic minorities are supported, as they may feel particularly vulnerable when raising concerns
- Ensuring staff are empowered and protected, enabling them to raise concerns freely

9. Procedure

When raising concerns, individuals will express them verbally or in writing to the Principal. If an individual is raising a concern about the Principal, they should express their concerns in writing to the Board of directors. Where this is the case, the board of directors / governors will take on the Principal duties outlined in section 10.

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.

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 (www.protect-advice.org.uk), or they can be contacted on 020 31172520.

Once an individual has raised a concern, the school will be responsible for investigating it. In certain instances, it may be appropriate for the individual to raise the concern with an outside agency, e.g. the police, depending on 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 LA, they should contact the LA's LADO Miles Dent via 01629 531940.

If a member of staff feels like they are unable to raise a safeguarding-related concern with the school, or would prefer a different option than the LADO they are able to contact the NSPCC Whistleblowing Helpline on 0800 028 0285

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.

10. Next steps

The Principal 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 Principal will establish if:

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

During the initial interview, the Principal will request the individual puts their concern in writing, if they have not already done so. The Principal will write a summary of the concern if the individual is unable to put it in writing.

The Principal 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 complainant 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. Anonymous concerns will still be considered but investigating evidence may be limited.
- That the Board of directors 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.
- Any form of victimisation, disciplinary or dismissal for raising a protected disclosure will be treated as gross misconduct.
- The school will offer support, e.g. access to occupational health/employee assistance/trade union and will consider temporary workplace adjustments if necessary.

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 the school's Records Management Policy.

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 professional association representative, a friend or a fellow member of staff not involved in the area of work that the concern relates to. This 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.

11. What the school asks of you

The purpose of this policy is to enable individuals to raise concerns in confidence, without any fear of reprisal; therefore, it is imperative that whistle-blower's:

- Do not take the concern outside the school, e.g. gossiping.
- 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.

12. Appeal process

If the member of staff raising the concern is unhappy with the outcome of the investigation or with the action proposed, then they will have the right of appeal to a Review Panel.

A Review Panel will be convened, by Rushcliffe Care, within 28 days of the request being made and will follow the protocol outlined within High Grange's formal complaints procedures. The Review Panel's recommendations will be forwarded to the director of Rushcliffe Care, who will respond in writing to the member of staff within 28 days.

Taking the matter further

This policy is intended to provide a means by which staff can raise concerns within High Grange. If however a member of staff is unhappy with the response within these procedures, then they can of course take the matter outside of High Grange School. The following are possible contact points:

Anyone may raise the concern externally if internal routes are inappropriate or have failed, or in cases of serious or systemic risk.

Key external bodies for child-related whistleblowing and safeguarding:

- **Derby & Derbyshire — Starting Point / Call Derbyshire (children's services referral)**
 - Call Derbyshire (Starting Point) — **01629 533190** (24/7 service). Out of hours: **01629 532600**. Use this for urgent child protection concerns and referrals. schoolsnet.derbyshire.gov.uk+2derbyshire.gov.uk+2
- **NSPCC Whistleblowing Advice Line** — confidential/anonymous advice (for concerns about how your organisation is handling child protection): **0800 028 0285** or **help@nspcc.org.uk**. The NSPCC is a prescribed whistleblowing body for child welfare. [NSPCC+1](https://www.nspcc.org.uk)
- **Ofsted** — for complaints about schools/childcare providers or if the provider is regulated by Ofsted: phone **0300 123 4666** or follow Ofsted's whistleblowing/complaints routes. (Ofsted also has a dedicated whistleblowing hotline for children's social care matters.) [GOV.UK+1](https://www.gov.uk)
- **Department for Education (DfE)** — you can make a whistleblowing disclosure to the DfE; the DfE publishes how it handles disclosures and the DfE whistleblowing policy. (Use where matters relate to DfE-regulated institutions, or where internal/external local routes are not suitable.) [GOV.UK+1](https://www.gov.uk)
- **Police** — ring **999** if a child is in immediate danger; otherwise contact local police via the non-emergency number (101). (Also used for criminal allegations.)

13. 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. Any claims of unfair dismissal needs be made within three months of the investigation ending.

14. Monitoring and review

The governing board will review this policy annually, ensuring that all procedures are up-to-date – the next review date for this policy is September 2025

Any changes made to this policy will be communicated to all members of staff.

Appendix A - Whistle Blowing Procedure for Escalating Concerns

