


Whistle Blowing Policy

Thomas Keble School



This policy is required under the Academy Trust Handbook and sets out the procedure for raising concerns about wrongdoing at Thomas Keble School.	July 2026
Signed by The Chair of Trustees Ms. Mia Baker:	
Implemented:	July 2026
This policy does not form part of any employee's contract and may be reviewed periodically. Next review date:	July 2029
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1.0 Introduction

- 1.1 Thomas Keble School is committed to the highest standards of openness, probity and accountability. Staff and others working with the school are encouraged to raise concerns about any suspected wrongdoing as soon as possible, in the public interest.
- 1.2 The school recognises that individuals are often the first to identify concerns but may feel reluctant to report them for fear of reprisal, victimisation or because they are unsure whether their concern is appropriate. This policy is designed to support and encourage staff to raise such concerns without fear of disadvantage.
- 1.3 All concerns raised under this policy will be taken seriously, handled sensitively and, where appropriate, investigated in a timely and proportionate manner. Every effort will be made to treat matters confidentially, consistent with the need to conduct a fair and thorough investigation.
- 1.4 Staff who make a disclosure in the public interest are protected by law under the Public Interest Disclosure Act 1998. The school will not tolerate harassment, victimisation or detrimental treatment of any individual who raises a genuine concern. Any such behaviour will be treated as a disciplinary matter.
- 1.5 No confidentiality clause, settlement agreement or non-disclosure agreement (NDA) can prevent staff from making a protected disclosure.
- 1.6 This policy is intended to provide a clear framework for raising and responding to concerns about wrongdoing. It does not replace other procedures within the school, such as the grievance or safeguarding processes, which should be used where appropriate.

2.0 Aims and scope of this procedure

- 2.1 This policy aims to:
 - encourage staff and others working with the school to report suspected wrongdoing as soon as possible, in the public interest
 - provide clear guidance on how to raise concerns and the routes available for doing so
 - ensure that all concerns raised are taken seriously, handled fairly and investigated appropriately
 - reassure individuals that they will be protected from victimisation, harassment or disadvantage when raising a genuine concern, even if it is not substantiated
 - promote a culture of openness, transparency and accountability across the school
- 2.2 This policy applies to all employees, governors and volunteers, as well as third parties working with or on behalf of the school, including agency staff, contractors and consultants.
- 2.3 The policy is intended to cover concerns that fall outside other established procedures and relate to wrongdoing in the public interest. These may include (but are not limited to):



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- criminal offences or unlawful acts
- breaches of legal or regulatory obligations
- risks to the health, safety or welfare of pupils, staff or others
- safeguarding concerns, including abuse or neglect
- misuse of public funds or financial irregularities
- sexual harassment or inappropriate conduct
- deliberate attempts to conceal any of the above

2.4 Concerns that relate solely to an individual's own employment, such as personal grievances or workplace disputes, should normally be raised through the school's grievance procedure.

2.5 This policy should be read alongside other relevant school policies, including those relating to safeguarding, staff conduct, complaints and disciplinary procedures.

3.0 What is Whistleblowing

4.0 Whistleblowing is the reporting of concerns about wrongdoing in the public interest. This may include (but is not limited to):

- criminal offences (e.g. fraud or corruption);
- risks to health and safety;
- safeguarding concerns, including abuse or neglect;
- breaches of legal or regulatory obligations;
- misuse of public funds;
- damage to the environment;
- sexual harassment;
- attempts to conceal any of the above.

4.1 A whistleblower is a person who raises a genuine concern relating to any of the above.

4.2 Not all concerns constitute whistleblowing. Personal grievances (for example, bullying or harassment that relates solely to an individual's employment) should normally be raised through the school's grievance procedure.

4.3 Where a concern includes both personal and wider public interest issues, advice should be sought to determine the appropriate procedure.



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5.0 Reporting a Concern

6.0 Staff should normally raise concerns with:

- their line manager;
- the Headteacher.

6.1 If the concern relates to the Headteacher, it should be reported to the Chair of Trustees.

6.2 If the concern relates to the Chair of Trustees, it should be reported to another trustee or an appropriate independent contact.

6.3 Staff may also seek independent advice before raising a concern from:

- their trade union
- Protect (the independent whistleblowing advice service)

6.4 Concerns should, wherever possible, be raised in writing and include:

- the background and history of the concern
- relevant dates and locations
- the individuals involved
- any supporting evidence

6.5 Staff are encouraged to identify themselves when raising concerns, although anonymous concerns will be considered at the discretion of the school. It should be noted that anonymous concerns may be more difficult to investigate.

7.0 How the School Will Respond

Step 1 – Initial Review

8.0 When a concern is raised, the school will:

- assess whether the concern falls within the scope of whistleblowing
- determine whether an investigation is required

8.1 Concerns that fall under other procedures (e.g. safeguarding or grievance) will be redirected accordingly.

Step 2 – Investigation

8.2 Where an investigation is required:



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- an appropriate investigating officer will be appointed
- trustees may be involved where appropriate
- in some cases, external agencies or investigators may be engaged
- matters may be referred to the police or relevant authorities where necessary

Step 3 – Communication

8.3 Within **10 working days** of a concern being raised, the person raising the concern will receive written confirmation:

- acknowledging receipt of the concern
- explaining how the matter will be handled
- confirming whether initial enquiries have taken place
- indicating whether further investigation will occur and, if not, why

8.4 They will also be provided with an indication of expected timescales.

Step 4 – Outcome

8.5 Following investigation:

- a report will be prepared outlining findings
- appropriate action will be taken where wrongdoing is identified
- recommendations will be made to prevent recurrence
- the whistleblower will be informed of the outcome, subject to confidentiality constraints

8.6 While the school will endeavour to address all concerns appropriately, it may not always be possible to provide full details of actions taken.

Support

8.7 The school recognises that raising and responding to concerns can be difficult. Appropriate support will be offered to:

- the individual raising the concern
- those who are the subject of the concern



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9.0 Confidentiality and Anonymity

9.1 All concerns will be treated in confidence and every reasonable effort will be made to protect the identity of the individual raising the concern.

9.2 However, it may not be possible to guarantee confidentiality in all circumstances, such as where disclosure is required by law or where the individual is required to give evidence.

9.3 Anonymous allegations will be considered, taking into account:

- the seriousness of the concern
- the credibility of the allegation
- the likelihood of confirming the issue from other sources

10.0 Malicious or Untrue Allegations

10.1 No action will be taken against any individual who raises a concern in good faith and in the public interest, even if the concern is not substantiated following investigation.

10.2 However, if an allegation is found to be deliberately false, malicious or made for personal gain, disciplinary action may be taken.

11.0 Escalation Outside the School

11.1 The school encourages staff to raise concerns internally in the first instance. However, staff may raise concerns externally with prescribed bodies where appropriate, including:

- Ofsted
- Health and Safety Executive
- the Local Authority

A full list of prescribed persons and bodies is available at:

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

Independent advice is available from Protect:

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

Staff should seek advice before making an external disclosure to ensure they remain protected under whistleblowing legislation.



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12.0 10. Links to Other Policies

12.1 This policy should be read alongside:

- Safeguarding / Child Protection Policy
- Staff Code of Conduct
- Grievance Policy
- Complaints Procedure
- Disciplinary Policy

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