Wittersham Church of England Primary Whistleblowing Policy 2026

We strive to cooperate and work alongside all members of our community to feel valued, nurtured, and empowered as they embark upon their journey to become the very best that God intended. Throughout their voyage of discovery with us, we ensure all children are provided with a rich curriculum and experiences that promote courage and a strong moral purpose underpinned by our Christian values, preparing them to become compassionate citizens within our rural community and the wider world

Revision History

Version	Date	By	Description
V03	October 2023	G. Hawkins	Reviewed and Updated
V04	October 2024	Stella Coulson	Reviewed and Updated
V05	October 2025	Stella Coulson	Reviewed and Updated
V06	September 2026	Stella Coulson	Reviewed and Updated

1. Policy Statement

Wittersham Church of England Primary School is committed to achieving the highest possible standards of integrity, openness, accountability and probity in all aspects of its work.

The school recognises that staff and others working within or on behalf of the school may sometimes become aware of wrongdoing, malpractice, risk or other serious concerns. Everyone should feel able to raise such concerns safely and with confidence that they will be taken seriously.

This policy provides a clear procedure through which concerns can be raised and considered appropriately.

The school recognises the protections provided to workers who make qualifying disclosures in the public interest under the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998.

The school encourages concerns to be raised internally at the earliest opportunity wherever appropriate. Concerns will be taken seriously, considered promptly and investigated where necessary. Depending upon the nature of the concern, this may include referral to the Local Authority, Local Authority Designated Officer (LADO), police, auditors, regulatory bodies or other appropriate agencies.

No person who raises a genuine concern in accordance with this policy should suffer detriment, harassment, victimisation or disadvantage as a result of doing so.

Wherever possible, the identity of a person raising a concern will be kept confidential. However, there may be circumstances where disclosure is necessary in order to investigate the concern properly, meet safeguarding responsibilities or comply with legal requirements.

This policy explains:

- how concerns can be raised;
- how concerns will be considered and investigated;
- how concerns can be escalated;
- the protection and support available to those raising concerns; and
- the responsibilities of the school and Governing Board.

2. Scope

This policy applies to employees, agency workers and other workers at Wittersham Church of England Primary School. The school also encourages volunteers, contractors and others working on behalf of the school to use the procedures within this policy to raise serious concerns, although statutory whistleblowing protection may not apply to every category of person in the same way.

Protect, the UK's whistleblowing charity, describes whistleblowing as raising a concern about wrongdoing, risk or malpractice which affects others or the wider public interest.

Whistleblowing concerns may include, but are not limited to:

- a criminal offence;
- failure to comply with a legal obligation;
- a miscarriage of justice;
- danger to the health or safety of an individual;
- damage to the environment;
- fraud, corruption, bribery or financial malpractice;
- misuse of public money or school resources;
- safeguarding or child protection failures;
- conduct which places children or adults at risk;
- failure to comply with statutory safeguarding responsibilities;
- failure to have due regard to the Prevent Duty;
- serious breaches of professional or ethical standards;
- serious failures in the school's governance or service provision; and
- deliberate concealment of information relating to any of the above.

For a disclosure to receive statutory whistleblowing protection, it must meet the legal requirements for a qualifying and protected disclosure. It is not necessary for a member of staff to determine whether those legal requirements have been met before raising a genuine concern under this policy.

A concern relating solely to an individual's own employment circumstances will normally be dealt with through the school's grievance procedure rather than this policy.

Concerns may relate to the actions or practices of:

- employees;

- members of the Governing Board;
- volunteers;
- contractors;
- agency workers; or
- other individuals or organisations working on behalf of the school.

Concerns may be raised individually or collectively. There is no prescribed time limit for raising a concern; however, concerns should be raised as soon as reasonably practicable so that they can be addressed effectively.

3. Safeguarding and Whistleblowing

All staff have a responsibility to safeguard and promote the welfare of children.

Staff should follow the school's Child Protection and Safeguarding Policy and Keeping Children Safe in Education 2026 when they have concerns about the safety or welfare of a child.

Where a member of staff has concerns about the behaviour of an adult working in or on behalf of the school, including a concern that an adult may have behaved in a way that has harmed a child, 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 they may pose a risk of harm, or behaved in a way that indicates they may not be suitable to work with children, the school's safeguarding procedures must be followed immediately.

Low-level concerns about adults should be reported in accordance with the school's Low-Level Concerns procedures.

Where there are concerns about the way in which safeguarding is being managed within the school, or where a member of staff feels unable to raise a safeguarding concern through the usual channels, the whistleblowing procedures in this policy should be followed.

Where a member of staff feels unable to raise a concern within the school, or feels that a genuine safeguarding concern is not being addressed, they may use the NSPCC Whistleblowing Advice Line or contact the appropriate external agency.

Nothing within this policy prevents an individual from making an appropriate referral

directly to children's social care, the LADO, police or another relevant safeguarding agency where necessary to protect a child.

4. Adoption and Review

This policy was adopted by the Governing Board of Wittersham Church of England Primary School in September 2026.

The policy will normally be reviewed annually, or sooner where:

- legislation or statutory guidance changes;
- safeguarding guidance changes;
- experience indicates that amendments are required; or
- the Governing Board considers an earlier review necessary.

The next scheduled review will take place in September 2027

5. Responsibilities of the School

Wittersham Church of England Primary School and its Governing Board will:

- promote an open and transparent culture in which staff feel able to raise concerns;
- ensure staff know how and with whom concerns should be raised;
- take concerns seriously and respond appropriately;
- ensure concerns are assessed objectively and investigated where necessary;
- maintain appropriate confidentiality;
- provide appropriate feedback wherever possible;
- ensure staff know how concerns may be escalated;
- protect individuals raising genuine concerns from detriment, harassment or victimisation;
- maintain appropriate records; and
- ensure whistleblowing arrangements are reviewed regularly.

6. Responsibilities of Staff

All staff are expected to:

- raise genuine concerns where they reasonably believe wrongdoing, malpractice

or risk may have occurred, is occurring or is likely to occur;
- raise safeguarding concerns promptly in accordance with the school's safeguarding procedures;
- provide information honestly and accurately;
- maintain appropriate confidentiality;
- cooperate with any subsequent investigation where required; and
- not knowingly make false allegations.

A member of staff does not need proof before raising a concern. A reasonable belief that wrongdoing may be occurring is sufficient to raise the matter.

A concern which is raised genuinely but subsequently proves to be mistaken will not result in disciplinary action.

Knowingly making a false allegation, however, may be considered under the school's disciplinary procedures.

7. Trade Union and Other Support

Staff may seek advice from their trade union or professional association before or during the whistleblowing process.

Where appropriate, a person raising a concern may be accompanied at meetings by a trade union representative or workplace colleague who is not directly involved in the matter.

Staff may also seek independent advice from Protect, the UK's whistleblowing charity.

8. Role of the Governing Board

The Governing Board has overall responsibility for ensuring that appropriate whistleblowing arrangements are in place.

The Headteacher, supported by the Governing Board, will:

- ensure this policy is implemented effectively;
- ensure staff are aware of the school's whistleblowing procedures;
- provide information or training where appropriate;
- ensure concerns are handled fairly and consistently; and
- monitor the effectiveness of the school's arrangements.

The Governing Board should receive appropriate anonymised information about whistleblowing activity to enable it to fulfil its oversight responsibilities.

This may include:

- the number and general nature of concerns raised;
- outcomes or actions arising from concerns;
- any allegations of victimisation or breaches of confidentiality;
- recurring themes or organisational learning; and
- information about staff awareness of whistleblowing procedures.

Reports to governors must not identify individuals or compromise ongoing investigations.

Procedure

9. Raising a Concern

A concern should normally be raised with the member of staff's line manager or the Headteacher.

At Wittersham Church of England Primary School, concerns may be raised directly with:

Headteacher: Mrs Stella Coulson
Chair of Governors: Mr John Collins

Where the concern relates to the Headteacher, or where it would otherwise be inappropriate to raise the matter with the Headteacher, the concern should be raised directly with the Chair of Governors.

Where the concern relates to the Chair of Governors, it should be raised with the appropriate alternative governor or the Local Authority, depending upon the nature of the concern.

Concerns may be raised verbally or in writing.

Where possible, the person raising the concern should provide:

- the background and circumstances of the concern;
- relevant names, dates and places;

- details of what has happened or is believed to be happening;
- the reason for the concern;
- any supporting information available; and
- confirmation that the matter is being raised under the Whistleblowing Policy.

Staff are not expected to investigate the matter themselves or prove that wrongdoing has occurred.

10. Confidential and Anonymous Concerns

A person raising a concern may request that their identity is kept confidential.

The school will respect such requests wherever reasonably possible. However, complete confidentiality cannot be guaranteed where disclosure is required by law, is necessary to safeguard a child or another person, or is essential for a fair and effective investigation.

Where it becomes necessary to disclose the identity of the person raising the concern, the school will, wherever possible, discuss this with them beforehand.

Anonymous concerns will be considered, although anonymity may make it more difficult to investigate a matter fully, obtain further information or provide feedback.

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

- the seriousness of the issue;
- the credibility of the concern;
- the information provided; and
- the likelihood of being able to investigate the matter effectively.

11. How the School Will Respond

The action taken will depend upon the nature and seriousness of the concern.

Where appropriate, the school will acknowledge receipt of a concern and provide an initial response within 10 working days.

The initial response may explain:

- how the school proposes to deal with the matter;

- whether initial enquiries have been made;
- whether further investigation is required;
- whether the matter has been referred elsewhere; and
- what further contact, where appropriate, the person raising the concern can expect.

Possible actions may include:

- preliminary enquiries;
- an internal investigation;
- action under the school's disciplinary or other procedures;
- referral to the Governing Board;
- referral to Kent County Council;
- referral to Internal Audit or external auditors;
- referral to the LADO or children's social care;
- referral to the police;
- referral to a regulatory or professional body; or
- no further action where there is insufficient basis to proceed.

Where urgent safeguarding or safety concerns arise, the school will act immediately and will not wait for the 10-working-day response period.

The school will seek to deal with concerns fairly, proportionately and without unnecessary delay.

12. Investigation

Where an investigation is required, an appropriate person will be appointed to undertake it.

The investigator should be sufficiently independent from the matters raised and should have no conflict of interest.

The person raising the concern may be asked to provide further information or attend a meeting.

Investigations will be conducted as sensitively and confidentially as possible, taking account of:

- the rights of the person raising the concern;

- the rights of any person who is the subject of the concern;
- safeguarding requirements;
- employment law;
- data protection requirements; and
- the need for a fair and effective investigation.

13. Notification of Outcome

Wherever reasonably possible, the person who raised the concern will be informed when the matter has been concluded and given appropriate information about the outcome.

There may be circumstances where the school cannot provide detailed information because of:

- confidentiality;
- data protection;
- safeguarding considerations;
- the rights of another employee;
- legal proceedings; or
- ongoing disciplinary or other processes.

14. Escalation and External Disclosure

The school hopes that concerns can normally be addressed through its internal procedures.

However, there may be circumstances where a person believes it is appropriate to raise a concern externally, including where:

- they reasonably believe the matter has not been dealt with appropriately;
- they reasonably believe they may suffer serious detriment if they raise the concern internally;
- evidence may be concealed or destroyed;
- the matter is exceptionally serious; or
- the law permits disclosure to an appropriate prescribed person or body.

Depending upon the nature of the concern, appropriate external bodies may include:

- Kent County Council;

- the Local Authority Designated Officer (LADO);
- Ofsted;
- the Department for Education;
- the Education and Skills Funding Agency, where applicable;
- the Health and Safety Executive;
- the police;
- the school's external auditors;
- a relevant professional or regulatory body;
- Protect; or
- the NSPCC Whistleblowing Advice Line for concerns relating to child protection or safeguarding practice.

Individuals considering making an external disclosure may wish to seek advice from their trade union, professional association, Protect or an independent legal adviser.

Further details are provided in Appendix 1.

15. Protection from Detriment

The school will not tolerate harassment, victimisation or other detrimental treatment of a person because they have raised a genuine concern.

Examples of detriment could include:

- disciplinary action because a concern has been raised;
- dismissal;
- denial of promotion or training opportunities;
- intimidation or harassment;
- unfair treatment; or
- other disadvantage connected with raising the concern.

Any member of staff who believes they have suffered detriment as a result of raising a concern should report this immediately to the Headteacher or, where appropriate, the Chair of Governors.

16. False or Malicious Allegations

The school recognises that concerns raised genuinely may subsequently prove to be unfounded. No action will be taken against a person simply because their genuine

concern is not substantiated.

However, where an allegation is knowingly false or is made maliciously, this may be considered under the school's disciplinary procedures.

The focus should be on whether the concern was raised genuinely and on reasonable grounds, rather than whether it was ultimately proven.

17. Support

The school recognises that raising a whistleblowing concern can be difficult.

Appropriate support will be made available wherever possible. Staff may seek support from:

- their trade union or professional association;
- a workplace colleague;
- the school's employee assistance or counselling service, where available;
- Protect; or
- another appropriate professional adviser.

18. Record Keeping and Data Protection

Records relating to whistleblowing concerns will be handled securely and confidentially in accordance with UK GDPR, the Data Protection Act 2018 and the school's records management and data protection arrangements.

Records should include, where appropriate:

- the nature of the concern;
- when and how it was raised;
- action taken;
- investigation records;
- referrals made;
- outcomes; and
- any lessons or actions arising from the matter.

Access to records will be restricted to those who have a legitimate reason to see them.

Information will be retained only for as long as necessary and in accordance with the

school's retention schedule.

The Governing Board will maintain appropriate oversight of whistleblowing concerns while ensuring that confidential information and the identities of individuals are protected.

19. Monitoring and Review

The Headteacher and Governing Board will monitor the effectiveness of this policy.

The Governing Board will consider anonymised information about whistleblowing activity as appropriate and ensure that any organisational learning or required improvements are acted upon.

This policy will be reviewed in September 2027, or sooner if legislation, statutory guidance or local procedures change.

Appendix 1 – External Advice and Reporting

Staff should use the most appropriate route according to the nature of their concern.

Kent County Council
For concerns requiring Local Authority involvement, including appropriate safeguarding, employment, financial or governance matters.

Local Authority Designated Officer (LADO)
For allegations or relevant safeguarding concerns about adults who work or volunteer with children.

Ofsted
Concerns about matters within Ofsted's regulatory responsibilities may be raised with Ofsted where appropriate.

Department for Education
Concerns relating to matters within the Department for Education's responsibilities may be raised through the appropriate DfE procedures.

Protect
An independent UK whistleblowing charity providing confidential advice to workers who are unsure whether or how to raise a whistleblowing concern.

NSPCC Whistleblowing Advice Line
Provides advice to employees who have concerns about how child protection or safeguarding issues are being handled within their organisation.

Health and Safety Executive
May be an appropriate prescribed body for serious health and safety concerns.

Police
Where there is reason to believe that a criminal offence has been committed or where there is an immediate risk of harm.

Staff should seek advice where necessary before making an external disclosure, as statutory whistleblowing protection depends upon the circumstances of the disclosure and the body to whom it is made.