



Staplehurst School

Whistleblowing Procedure - Speaking up about wrongdoing

Policy reviewed and approved at a meeting of the **Finance & Premises Committee**

7 May 2025

Policy to be next reviewed

Spring Term 2028

Version	Reviewed	Reviewer	Approved	Date Approved
Original	9/3/22	KH	Staplehurst School	March 2022
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1. Introduction

- 1.1. Every school maintained by the local authority should have a whistleblowing procedure. Whistleblowing procedures protect staff members who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties.
- 1.2. Governing bodies of maintained schools are responsible for agreeing and establishing the school's whistleblowing procedure. Every member of staff should be informed of the school's Whistleblowing arrangements.
- 1.3. It is important for individuals, employees, agency workers, volunteers and those contractors working on behalf of Staplehurst School to have an appropriate means to raise concerns if they believe that something is seriously wrong within Staplehurst School.
- 1.4. You may become aware of, or directly witness, situations or conduct that makes you feel uncomfortable or you regard as inappropriate. The Whistleblowing Procedure provides a means for you to raise concerns about matters not related to your own employment or your work within Staplehurst School but which you feel need to be examined. Examples of the type of matters that could lead to you wishing to raise a whistleblowing concern are:
 - conduct which is, has been or is likely to be an offence or breach of law
 - conduct that has occurred, is occurring or is likely to occur the result of which Staplehurst School fails to comply with a legal obligation. For example, unauthorised use of public funds, possible fraud and corruption, sexual or physical abuse of clients, or other unethical conduct discrimination of any kind and waste/frivolous expenditure
 - a concern that a Staplehurst School employee (or someone working with us) or a service user may be at risk of being drawn into extremism and terrorism (See para 10.1)
 - disclosures related to past, current or likely miscarriages of justice
 - past, current or likely health and safety risks, including risks to the public as well as other employees (see below)
 - past, current or likely damage to the environment
 - concerns about any aspect of service provision
 - other concerns regarding the conduct (including breaches of known standards or Staplehurst School's Standing Orders) of officers or Staplehurst School Members or others acting on behalf of Staplehurst School
- 1.5. This document outlines the process that will be followed in the event of a whistleblowing concern being raised.

2. Other Procedures

- 2.1. This procedure is separate from Staplehurst School's Complaints Procedures and other statutory reporting procedures. The Headteacher is responsible for making employees, agency workers, volunteers and contractors aware of these procedures.

- 2.2. Any investigation into allegations of potential malpractice under this procedure will not influence or be influenced by any disciplinary or redundancy procedures that already affect an individual.
- 2.3. Staplehurst School's Health & Safety Complaints Procedure should be used to raise any issues, concerns or complaints of a health and safety nature and which are not confidential.
- 2.4. If, as an employee, you wish to raise a concern regarding issues relating to your own employment Staplehurst School has a Grievance Policy that you can use. Relevant documents can be found on the staff shared drive.

3. How to Raise a Concern

General

- 3.1. Concerns can be raised verbally or in writing. A concern should:
 - set out the background and history of the concern, giving names, dates and places where possible
 - give the reason why you are particularly concerned about the situation.
- 3.2. The earlier a concern is raised the easier it is to take action. Although you are not expected to prove beyond doubt the truth of an allegation, you need to demonstrate to the person contacted that there are sufficient grounds for your concern.
- 3.3. If you intend to raise a whistleblowing concern you are encouraged to include your name. If you specifically request for your name not be released during the examination of your concern, all efforts will be made for this information to remain confidential. However, if you are required to participate in the process as a witness, it may not be possible for your name to be withheld.
- 3.4. A trade union or professional association may raise a matter on your behalf.
- 3.5. In the event of anonymous allegations being received, this should be sent to the member of staff appointed to deal with Whistleblowing concerns, if this is not appropriate the Head Teacher (dependant on whom the concern is about) and/ or a Governors who has been appointed to deal with concerns. This will determine whether or not it is possible and appropriate for the allegations to be examined.

Step One – Raising a Concern

- 3.6. Whenever possible you should raise your concern with your immediate manager or his/her manager, who can, if needed, seek guidance and advice from one of the Senior Management Contact Points. If this is not appropriate or you feel your concerns are not being addressed, you should approach the contact points in the below table according to the nature of the concern:

Position within the school	Contact Name	Contact Details
Chair of Governors details	Mr C Gooch	clerktogovernors@staplehurst.kent.sch.uk
Head Teacher	Mrs L Wall	headteacher@staplehurst.kent.sch.uk
Designated officer School Business Manager	Mrs K Hay	khay@staplehurst.kent.sch.uk
Deputy Head Teacher	Mr L Williams-Jones	lwjones@staplehurst.kent.sch.uk
Ofsted		Whistleblowing Hotline: 0300 1233155 Email address: whistleblowing@ofsted.gov.uk
NSPCC		Whistleblowing helpline: 0800 0280285 Further information is available on the NSPCC website.
Senior Management contact points	Kent County Council Head of Internal Audit or Counter Fraud Manager	Internal.audit@kent.gov.uk

Recording Concerns

- 3.7. Staplehurst School will be responsible for maintaining a whistleblowing log. Managers who receive a concern should send details to the lead contact for Whistleblowing. The log will include the area of school that have been affected, a summary of the concerns being raised, action taken and the resulting outcome.
- 3.8. Staplehurst School has an Anti-Fraud and Corruption Strategy and all suspected financial irregularities must be reported to the Head of Internal Audit.

Whistleblowing Hotline [Not applicable to Academies]

- 3.9. Internal Audit is independent and provides objective assurance and consulting activity designed to add value and improve an organisation's operations. If you wish to raise any type of Whistleblowing concern directly with Internal Audit (anonymously if necessary) please call the Whistleblowing helpline on 03000 414 500 or e-mail internal.audit@kent.gov.uk.

Step Two - How Staplehurst School will respond

- 3.10. The action Staplehurst School takes will depend on the nature of the concern. The matters raised may:

- be investigated internally by management, Internal Audit (financial irregularities) or through the disciplinary or other internal process
- be referred to the Police
- be referred to the External Auditor
- form the subject of an independent inquiry.

3.11. You will be written to within ten working days of your concern being raised

- acknowledging that the concern has been received
- indicating how Staplehurst School proposes to deal with the matter
- giving an estimate of how long it will take to provide a final response
- informing you if any initial enquiries have been made
- whether further investigations will take place and, if not, why not.

3.12. In order to protect individuals and Staplehurst School initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures (e.g. child protection or discrimination issues) will normally be referred for consideration under those procedures.

3.13. An appropriate manager will conduct preliminary enquiries into the matters you have raised. In order to determine whether your concern needs to be formally investigated the manager will seek advice from Area Education Officer, Head Teacher and, where appropriate, safeguarding professionals, Internal Audit or the Counter Fraud Manager.

3.14. When any meeting is arranged you have the right to be accompanied by a trade union representative or a workplace colleague who is not involved in the area of work to which the concern relates.

3.15. The formal investigation will identify what, if any, action is required to address the concerns you identified via the Whistleblowing Procedure. This may involve disciplinary action against another Staplehurst School employee or the involvement of agencies such as the Police or the External Auditor.

3.16. Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.

Protection from Reprisals and Victimisation

3.17. Staplehurst School does not tolerate reprisals, victimisation or harassment and will take all reasonable action to protect you if you raise a concern via the Whistleblowing Procedure. Staplehurst School will treat any reprisals, victimisation or harassment as a serious matter and if this involves a Staplehurst School employee it will be investigated in accordance with the Disciplinary Procedure. In the event of a disciplinary case being found, this could potentially result in the person's dismissal.

Public Interest Disclosure

3.18. The Public Interest Disclosure Act 1998 gives employees two safeguards in respect of disclosures of information.

- An employee is entitled not to be subjected to any detriment by virtue of having made a protected disclosure.

The dismissal of any Staplehurst School employee directly due to the individual having made such a disclosure will automatically be unfair

Support

3.19. Staplehurst School will take steps to minimise any difficulties you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, Staplehurst School will advise or arrange for you to have advice about the procedure.

3.20. Staplehurst School accepts that you need to be assured that concerns will be properly addressed and, subject to legal constraints, will provide information about the outcomes of any investigations.

Contact

3.21. The amount of contact between the officers considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought.

4. How the Matter can be taken further

4.1. This procedure is intended to reassure you and provide clear information to help you raise concerns in confidence and directly with the Council.

4.2. Staplehurst School hope you will be satisfied with its response. If you are not, or if you feel for any reason, you can't raise the matter directly with the school then possible alternative points of contact points are listed below.

4.3. Please be assured that we would rather you raised a matter with an appropriate regulator or outside body than not at all.

Contact Details	internal.audit@kent.gov.uk 03000 416621
Nick Abrahams: Area Education Officer	Kent County Council Nick.abrahams@kent.gov.uk 03000 410058
The Department for Education	https://form.education.gov.uk/service/Contact_the_Department_for_Education

The Equalities and Human Rights Commission	Address: FREEPOST Equality Advisory Support Service FPN4431 Email: correspondence@equalityhumanrights.com Web: www.equalityhumanrights.com Tel no. 0808 800 0082
The Health and Safety Executive (Regional Office)	Address: Health and Safety Executive, International House Dover Place Ashford Kent TN23 1HU : Web: www.hse.gov.uk Tel no. 0845 345 0055
The Environment Agency (Regional Office)	Address: National Customer Contact Centre PO Box 544 Rotherham S60 1BY E-mail: enquiries@environmentagency.gov.uk Web: www.environment-agency.gov.uk Tel No. 0370 850 6506
Citizens Advice	Please refer to web for local information Web: www.citizensadvice.org.uk/
Police	Please refer to web for local information Web: www.kent.police.uk Tel No. non emergencies 101
Protect – Free Confidential Whistleblowing advice	Tel No: 020 3117 2520 Website: www.protect-advice.org.uk
Whistleblowing: List of prescribed people and bodies	Website: https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies

5. Reporting

5.1. Anonymised information on the number of referrals, concerns and outcomes will be reported by the whistleblowing policy owner on a yearly basis to the Chair of Staplehurst School's Governing Body. This is to provide assurance on the communication strategy and current awareness of whistleblowing across the organisation.

6. False or Malicious Allegations.

6.1. Disciplinary action will only be taken against individuals who make malicious or vexatious allegations.

Whistleblowing Procedure

