



# Whistleblowing procedure

*This procedure pays regard to the DfE's latest statutory guidance [Keeping Children Safe in Education 2025](#) and independent school standards 7 and 34.*

Policy content includes:

- our whistleblowing procedure
- referring to the Disclosure and Barring Service (DBS)
- information about the NSPCC helpline.

|                                        |                |
|----------------------------------------|----------------|
| <b>Last updated by senior leaders</b>  | September 2025 |
| <b>Last reviewed by advisory board</b> | September 2025 |
| <b>Next review due</b>                 | September 2026 |

## **What is whistleblowing?**

- Whistleblowing is when an individual worker reports suspected wrongdoing at work. Officially this is called 'making a disclosure in the public interest'.
- An individual can report things that are not right, are illegal or if anyone at work is neglecting their duties, including, for example:
  - someone's health and safety being endangered.
  - damage to the environment.
  - a criminal offence.
  - covering up wrongdoing.

## **Context**

- The law provides protection for workers who raise legitimate concerns about specified matters. These are called 'qualifying disclosures'. A qualifying disclosure is one made in the public interest by the worker who has a reasonable belief that one (or more) of the following is being, has been, or is likely to be, committed:
  - a criminal offence.
  - a miscarriage of justice.
  - an act creating risk to health and safety.
  - an act causing damage to the environment.
  - corruptly receiving any gift or advantage, thus failing to comply with the Bribery Act 2010.
  - allowing private interests to override the interests of the School.
  - a breach of any legal obligation.
  - concealment of any of the above.
- It is not necessary for the worker to have proof that such an act is being, has been, or is likely to be committed - a reasonable belief is sufficient. The worker has no responsibility for investigating the matter; it is the school's responsibility to ensure that an investigation takes place.
- Where the concerns are about safeguarding children, the School's designated safeguarding lead must be notified (or in their absence, one of the deputy designated safeguarding leads).

## **Overview**

- This policy applies to all employees and any other individual workers performing functions in relation to the School, including agency staff, trainees and self-employed individuals providing services to the school.
- All workers at St. John's receive a safeguarding induction, which includes coverage of this policy.
- St. John's expects the highest standards of conduct from all workers and will treat seriously any concern raised about illegal or improper conduct. Any

individual covered by this policy will be expected, through agreed procedures and without fear of recrimination, to bring to the attention of the Principal or Headteacher any serious impropriety or breach of procedure.

- It is important that any fraud, misconduct or wrongdoing by workers is properly dealt with. The Principal, Headteacher or Advisory Board members, therefore, respond to all individuals who raise any genuine concerns that they may have about the conduct of others in the School, which are in the public interest. This procedure sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.
- Workers who do not follow the steps identified in this procedure or other agreed internal procedures and take their concerns to other outside sources (e.g. the media), are likely to be subject to a formal disciplinary investigation, as per our disciplinary procedures.

### **When should this procedure be used?**

- This procedure is for disclosures about matters other than a breach of an employee's own contract of employment. If a worker is concerned that his/her own contract has been, or is likely to be, broken he/she should use the School's grievance procedures.
- Where a disclosure is merely an expression of opinion that fails to show that a legal obligation has been or is likely to be breached, it cannot amount to a protected or qualifying disclosure.
- This procedure, then, is not designed to replace or be used as an alternative to the grievance procedure, which should be used where an employee is only aggrieved about his/her own situation; and does not apply where the worker simply disagrees with the way the School is led and/or managed.
- Workers must have reasonable grounds for believing the information they have is accurate and not just gossip or rumour.

### **Who to raise concerns with**

| <b>Concern</b>                                  | <b>Raise with...</b>                                                                                                                                         |
|-------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| About any worker below Principal or Headteacher | The Principal (Preparatory) or Headteacher (Senior)                                                                                                          |
| About the Principal or Headteacher              | The chair of the external advisory board via <b><a href="mailto:whistleblowing@stjohnsprepandsenior.co.uk">whistleblowing@stjohnsprepandsenior.co.uk</a></b> |

- If the worker is concerned that everybody identified above is involved in the wrongdoing, have failed to make a proper investigation or have failed to report the outcome of the investigation, he/she has the option of contacting

the [Local Authority's Designated Officer \(LADO\)](#) and/or the registration authority and regulatory body for the School, the Department for Education (DfE).

### **The procedure**

- The Principal or Headteacher or Advisory Board Chair will arrange an investigation into the matter. The investigation may involve the worker and others involved giving written statements. Any investigation will be carried out in accordance with the principles set out below. The worker's statement will be considered and he/she will be asked to comment on any additional evidence obtained.
- Workers who want to use the procedure but feel uneasy about it may wish to consult their professional association/trade union initially and bring a colleague or professional association/trade union representative along to any discussions, so long as the third party is not involved in the concern.
- Where anonymity is requested, efforts will be made to meet the request where appropriate but that might not always be possible. The earlier and more open the expression of concern, the easier it will be to take appropriate action.
- The relevant senior leader will then take the necessary action, including disciplinary action and the reporting of the matter to any appropriate department and/or regulatory agency. On conclusion of any investigation the worker will be told the outcome of the investigation and what the next steps will be. If no action is to be taken the reason(s) for this will be explained.

### **Principles**

- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the worker who raised the issue.
- A worker who makes a protected disclosure has the right not to be dismissed, subject to any other detriment, or victimised, because he/she has made a disclosure, provided it has not been made maliciously. Any worker who uses this procedure will not be penalised for doing so. We will not tolerate harassment and/or victimisation of any worker raising concerns. The continued employment and opportunities for future promotion or training of the worker will not be prejudiced because he/she has raised a legitimate concern.
- Victimisation of a worker for raising a qualified disclosure is a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this procedure the matter will be considered under our disciplinary procedures, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.

- An instruction to cover up wrongdoing is in itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority, workers should not agree to remain silent.

### **What if an issue is raised with a member of staff?**

- If a staff member, other than the Principal, Headteacher or advisory board member is approached by a colleague on a matter of concern as defined in this document, he/she is advised to take the matter to the most relevant person identified in the table above, as appropriate.

### **NSPCC helpline**

- Where a worker feels unable to raise an issue according to the steps highlighted above or feels that their genuine concerns are not being addressed, staff may contact the NSPCC helpline on 0800 028 0285. Alternatively, staff can email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### **Referring to the Disclosure & Barring Service (DBS)**

- Senior leaders at St. John's are clear about the duty to refer a person who may be deemed unsuitable to work with children to the DBS. Specifically, we refer to the DBS any member of staff who:
  - has harmed, or poses a risk of harm, to a child.
  - has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence.
  - is dismissed or receives disciplinary action because of misconduct relating to a child.
  - leaves their employment during an investigation related to misconduct relating to a child.
- The DBS will then consider whether to bar the person. Referrals will be made as soon as possible after, if applicable, the disciplinary or dismissal action has been taken and/or the staff member has left during an investigation.