Springcroft Primary School

Whistleblowing Policy

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Approved	Signature	Date

Our Mission Statement:
Where Every Child Matters and Every Heart Belongs

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1. Statement from the Chief Executive

We (Staffordshire County Council/SCC) want our workforce to be ambitious, courageous, and empowered to do a great job and make a positive difference to the lives of the people we serve.

To support this, we want a positive working environment and a culture of confidence, respect and equality. When things do not go to plan, it is important we resolve issues in the right way for all involved.

Our People Policies provide managers and colleagues with clear yet flexible guidance to deal with those issues quickly and fairly.

2. Guiding Principles

We are committed to developing policies and processes that reflect our People Strategy, our values and contribute to promoting a positive working environment.

Our principles therefore comprise:

- Encouraging adult-to-adult conversations where everyone acts to address workplace concerns early through 1-2-1's , supervision and other day-to-day conversations.
- Being supportive, proactive and solution focused, addressing concerns quickly and fairly, tailored to individual needs.
- Recognising that everyone has a responsibility and role to play in creating the right conditions to do their job well.
- Focusing on wellbeing and building trust within the workplace.
- Developing policies that support diversity and inclusion and promote an inclusive work environment free from any form of discrimination, bullying, harassment, or victimisation.
- Holding ourselves and each other to account to always behave and act in the best interests of the school, council and people of Staffordshire.

3. Purpose

The aim of this policy is to encourage and enable staff to feel confident in raising concerns and to question and act upon concerns. This policy provides staff with a clear avenue to raise concerns and sets out how we will deal with them and communicate with staff.

It aims to ensure everyone feels able to raise any genuine concern in the knowledge that it will be taken seriously, and that they will be protected from repercussions. Those working for or on behalf of the council must not treat individuals detrimentally because they have made a qualifying disclosure (i.e. blow the whistle) under the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998 and the Employment Rights Act 2025.

4. Scope

This policy applies to all employees and workers employed by Springcroft Primary School including contractors, subcontractors, and agency workers. Other individuals, including our volunteers, suppliers and those genuinely self-employed are also encouraged to follow the procedure set out in this policy.

This policy has been implemented following consultation with Trade Unions that are recognised by SCC.

This policy does not form part of any contract of employment or contract to provide services, and may be amended at any time in consultation with recognised trade unions.

Where a colleague has a concern with their own treatment at work or in relation to their contract of employment, it is usually appropriate that they raise it under either the Complaints Policy. We will however consider if there are any exceptional circumstances in which we feel it appropriate to deal with it under the terms of this policy. If you are unsure about whether your concerns are best dealt with under the Whistleblowing Policy or another policy, please contact our HR Provider, InsightHR Ltd for further advice.

Decisions will be made in line with the school's local scheme of delegation or equivalent mechanism for making decisions at the appropriate level.

Legal framework

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

- Public Interest Disclosure Act 1998
- Employment Rights Act 1996 (as amended)
- Employment Rights Act 2025
- Equality Act 2010
- DfE (2026) 'Keeping children safe in education 2026'
- GOV.UK (2012) 'Whistleblowing for employees'
- DfE (2014) 'Whistleblowing procedure for maintained schools'
- Sir Robert Francis (2015) 'Freedom to speak up report'

The Public Interest Disclosure Act

The Public Interest Disclosure Act 1998 (PIDA) protects workers who "blow the whistle" where the worker 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 headteacher is the first point of contact for whistleblowing queries. If the allegation is related to the headteacher, the concern will be raised with the chair of governors.

Any member of the school community or the general public is able to "blow the whistle"; however, the PIDA only protects workers (a term which includes employees, agency workers,

trainees and some contractors). The 'Non-employees' section of this policy includes further details on how whistleblowing affects non-employees.

Definitions

"Whistleblowing" is when an employee reports suspected wrongdoing, or 'qualifying disclosures', at work to their employer.

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
- Sexual harassment has occurred, is occurring or is likely to occur (added by the Employment Rights Act 2025 with effect from April 2026)
- 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

This means that concerns about sexual harassment can be raised under this policy. This includes harassment of staff by third parties, such as parents, carers, visitors, contractors or suppliers. From 30 October 2026, the school has a legal duty to take all reasonable steps to prevent sexual harassment of its staff, including harassment by third parties. Where a concern relates only to an individual's own treatment, it may also be appropriate to raise it under the Prevention of Sexual Harassment Policy or the Grievance Policy. If you are unsure which route to use, please speak to the Headteacher or our HR Provider.

"In the public interest" 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.

The governing board will be responsible for:

- Establishing and agreeing the whistleblowing procedure.
- 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 whistle-blower’s 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 headteacher 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 chair of governors will be responsible for receiving any concerns raised about the headteacher.

All members of staff will be responsible for:

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

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 workers 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.

Non-employees

The PIDA and the Employment Rights Act 1996 do not protect individuals who are not workers, such as volunteers, parents and members of the public, as far as whistleblowing is concerned. Irrespective of this, 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.

Good practice principles

The school will implement the core whistleblowing principles, as outlined in the 'Freedom to speak up report', to ensure that whistleblowing procedures are fair, clear and consistent.

The school will implement a **culture of change** by ensuring the following principles are reflected in our ethos and values – there will be a culture:

- Of safety in the school.
- Where people feel confident with raising concerns.
- Free from bullying.
- Of visible leadership.
- Of valuing staff.
- Of reflective practice.

By providing a clear procedure for mediating and resolving cases, as outlined in the 'Procedure' section of this policy, 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

The school 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

What is whistleblowing?

Whistleblowing is when employees report certain types of wrongdoing which relate to risk or malpractice. This could well be something you've seen at work – though not always. The wrongdoing you disclose is often seen as something which is in the 'public interest'.

The following are the types of complaints that count as whistleblowing:

- A criminal offence, and/or
- A miscarriage of justice: and/or
- Risk or actual damage to the environment; and/or
- A failure to comply with a legal obligation; and/or
- A risk to the health and safety of an individual; and/or
- Sexual harassment; and/or
- You believe someone is covering up any of the above

Rights and Protection of the Whistle-blower

Springcroft Primary School and council aim to encourage openness and will support you if you raise genuine concerns under this Policy, even if they turn out to be mistaken.

In turn, to be protected by whistleblowing laws against detrimental treatment or dismissal, you must reasonably believe that the wrongdoing (as outlined above) is being, has been, or is likely to be committed and that your 'disclosure' is in the public interest. Examples of detrimental treatment include dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.
If you believe that you have been dismissed or subjected to a detriment because you made a protected disclosure, you may be able to bring a claim to an employment tribunal. Where the relevant date is on or after 1 October 2026, the time limit for making a claim is six months (previously three months). You will normally need to contact Acas for early conciliation before making a claim. Protection against dismissal for making a protected disclosure applies from the first day of employment and does not depend on length of service.

If you believe that you have been subjected to a detriment for raising such a complaint you should raise the matter with the Chair of Governing Body. If you believe that the Chair of Governing Body has subjected you to a detriment you should raise the matter to the Assistant Director for Education Strategy and Improvement at Staffordshire County Council, Mr Tim Moss (as at January 2024).

Victimisation of a whistle-blower by any other colleague, for raising a concern under this policy will constitute a disciplinary offence.

False allegations raised maliciously may lead to disciplinary action or a referral made to any relevant regulatory body if you are not an employee.

We will take all reasonable steps to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are asked to give evidence in a criminal or disciplinary proceedings, we will arrange for you to receive appropriate advice and support.

The process

Step 1 Raising a Whistleblowing concern

As soon as you become reasonably concerned, we hope you feel able to raise it. The earlier you raise your concern, the easier it is to take action.

You should raise your concern in the first instance, at any time, with either the nominated member of staff (e.g. Headteacher or Deputy Headteacher in their absence) or the Chair of Governor's who is appointed as a contact for Whistleblowing concerns. For this school these roles are undertaken by Mr Stephen Drew (Headteacher), Mrs Claire Cunningham (Deputy Headteacher), Dr Duncan Chadwick (Chair of Governor's). If the whistleblowing concerns involve the nominated member of staff or governor, you should raise your concern directly to the Vice Chair of Governing Body, Mr Gareth Kirk.

If your whistleblowing concerns relate to the Chair of the Governing Body, your concerns should be directed to the Vice Chair of Governing Body, Mr Gareth Kirk. The Vice Chair of Governing Body, may escalate the concern to the Assistant Director for Education at Staffordshire County Council. If your whistleblowing complaint relates to a local authority service provided to the school, you should direct it to the Assistant Director for Education Strategy and Improvement for Staffordshire County Council (see key contacts section) who will ensure it is raised through the appropriate internal process.

It could be something that has happened, is happening now or you believe will happen in the near future.

You can raise your concern verbally, or in writing (Appendix A). If you are emailing, particularly using an external email (i.e. your personal email) we strongly recommend that you secure the email by password protection with encryption and share the password by alternate method.

We recommend that you use our form to raise a whistleblowing concern. This will help you provide us with the information that we need to properly look at the concerns. Take care to ensure the accuracy of the information.

It is important that you set out clearly:

- What the concern is and to whom it relates
- The background and history of the concern – giving relevant dates and any evidence you may have
- The reason you are particularly concerned about the situation and why you believe the information to be true.

You are encouraged to put your name on any concern you raise as it makes it easier for the school or council to investigate it.

If you have difficulty at any stage of this procedure either

- Because of a disability or
- Because English is not your first language

You should discuss the situation with the nominated member of staff or governor as soon as possible, so that suitable support can be explored.

Step 2 Responding to your whistleblowing concern

On receipt of your 'disclosure' or concern, the nominated member of staff or governor will acknowledge its receipt, in writing to you, ideally within 5 working days. They will also seek advice and support via their HR or Legal Provider.

In some cases, they may need to ask you to attend a meeting to clarify the nature of your concern. This will be arranged as soon as possible. You may, if you wish, bring a colleague or a trade union representative with you to the meeting.

Where it is not possible to hold a face-to-face meeting, we may conduct the process remotely, for example using Microsoft Teams. We will ensure that you have access to the necessary technology for participating.

The nominated member of staff or governor will decide if an investigation is required or any other appropriate actions. For example, refer to another policy, the local authority audit/fraud team or the Local Authority Designated Officer (see key contacts section). The level of investigation and time this will take will vary depending on the nature of the suspected wrongdoing hence it is not possible to lay down precise timescales. However, at the outset of this process you and the nominated member of staff or governor will agree how and when communication will take place so that you are kept updated on progress.

Following the investigation, a report will be produced outlining findings, for the nominated member of staff or governor to decide any appropriate next steps, including whether it is appropriate to commence a disciplinary process.

They will endeavour to inform you of the outcome of our enquiries and/or investigations, however, given confidentiality and other relevant aspects and legal constraints, it may not be possible to share details of the outcome and any action taken.

Step 3 If you are dissatisfied with the outcome

Springcroft Primary School hope that you will be satisfied with the way your concerns are treated and any investigations that may be carried out.

However, if you are not, and you feel it is right to take the matter externally, i.e. outside the school, please find below a list of possible contacts. If you tell a prescribed person or body, it must be one that deals with the issue you are raising.

- A list of external regulatory organisations, such as the Secretary of State for Education or relevant professional bodies can be found at the following government website. Whistleblowing: list of prescribed people and bodies - GOV.UK (www.gov.uk)

- A disclosure about child protection and safeguarding concern can be raised directly with the local authority LADO, if not already raised. Similarly, if the matter relates to fraud you can raise it directly to the local authority's Fraud Team.

- The charity, Protect, can advise you about raising the concern externally. This will include advising who the appropriate prescribed regulator is.

We always encourage you to raise your whistleblowing concerns internally in the first instance. However, the law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body. It will very rarely, if ever, be appropriate to alert the media and as such you will not have protection under whistleblowing laws if you choose to make contact with the media unless certain conditions are met.

We strongly encourage you to seek advice before reporting a concern to anyone external. If you would like independent advice at any stage, you can contact the independent charity Protect. They should be able to give you free and confidential advice about how to raise a concern about serious malpractice at work. If you are a trade union member, your union may also be able to provide you with appropriate advice.

Confidentiality and Anonymity

We hope that you to feel able to raise a whistleblowing concern openly under this policy.

Where you raise a whistleblowing concern openly, we will maintain your confidentiality as far as possible. If we need to identify your identity to anyone, we will notify you beforehand and we will discuss with you whether and how we can proceed.

As an alternative, you may decide to raise a whistleblowing concern anonymously. We encourage anonymous reporting over remaining silent. Although we will investigate any concern that is reported anonymously, as best we can, an anonymous report is likely to be more difficult for us to investigate and we will not be in a position to provide you with any feedback. We will consider the seriousness of the issues raised, the credibility of the concern and the likelihood of confirming the allegation from attributable sources.

Wellbeing and Support

Supporting wellbeing is an integral and essential part of SCC's People Policies. Springcroft Primary School recognise that whistleblowing processes can be stressful for everyone involved. We all respond to stressful situations in different ways. Sometimes a process may cause distress and impact on both physical and mental health.

Springcroft Primary School buys in to the Councils Health and Safety service which provides access to Wellbeing support via the SLN (Staffordshire Learning Net). This contains information and resources and provides ideas and solutions to help support your own wellbeing as well as providing advice for your school management

More general wellbeing advice and information can be found at MIND and Mental Health Foundation.

Data Protection and Confidentiality

Springcroft Primary School aim is to deal with whistleblowing matters sensitively and with due respect for the privacy of any individuals involved. All employees must treat as confidential any information communicated to them in connection with such a complaint. Breach of confidentiality may give rise to disciplinary action.

If you are invited to a formal meeting, employees must not make any electronic recordings. An exception to this may be where it has been agreed by all parties as a reasonable adjustment related to a disability. Any breach of this provision may lead to disciplinary action, which could include dismissal or referral to any relevant regulatory body.

We process personal data collected during whistleblowing complaints/investigations in accordance with the Springcroft Primary School's privacy notice and General Data Protection Regulation (GDPR) policy.

Related Policies

This policy is part of a suite of people policies and other related policies that you may wish to read are as set out below:

- Complaints Policy
- Appeals Procedure
- Anti- Bullying Policy
- Staff Code of Conduct Policy

Further Advice

If you need any further information about any aspect of this policy, please initially speak to your nominated member of staff or governor for whistleblowing concerns. Your HR Provider will also be able to provide additional clarification and advice in respect of this policy.

Reviewing the Policy

This policy will be reviewed annually unless there is a requirement to do so before due to legislative or best practice changes.

Community Impact Analysis

Springcroft Primary School consider carefully how the decisions we make affect people who share different protected characteristics (race, disability, sex, gender re-assignment, religion, belief, sexual orientation, age, marriage and civil partnership, pregnancy and maternity).

The Community Impact Analysis, available to support this policy, highlights the proactive and positive approach we take to supporting employees who may raise a whistleblowing complaint, whilst taking into consideration any employee protected characteristics.

The completed community impact analysis to support this policy is available on request.

Key Contacts

Springcroft Primary School:

Nominated member of staff for Whistleblowing complaints: Mr Stephen Drew (Headteacher)

Nominated governor for Whistleblowing complaints: Dr Duncan Chadwick (Chair of Governor's)

Staffordshire County Council:

Staffordshire Local Authority Designated Officer (LADO): 0300 111 8007 or use the online enquiry form at the following website.
Website details: www.staffordshire.gov.uk/Care-for-children-and-families/Childprotection/rc-Professional.aspx

Staffordshire County Council's Audit Team: Fraud Email: fraud@staffordshire.gov.uk
Integrity Hotline: 0800 73118
Website details: www.staffordshire.gov.uk/Your-council-and-democracy/Report-fraud-bribery-and-theft/Online-reporting-form.aspx

Protect Charity: Protect - Speak up stop harm - Protect - Speak up stop harm (protect-advice.org.uk)
Protect Advice line: 0203 117 2520

Staffordshire County Council: Assistant Director for Education Strategy and Improvement: Mr Tim Moss (as at January 2024)
Contact details: tim.moss@staffordshire.gov.uk

Appendix A: Form for raising a Whistleblowing concern

This form is intended for use by any individual working for Springcroft Primary School (including contractors, workers and volunteers) who want to raise a concern about wrongdoing.

This form should be used to report wrongdoing within the school that you believe is in the public interest.

If your concern relates to a personal complaint that is not in the public interest (for example, an allegation of bullying or harassment, or that your contract of employment has been breached), you should raise it under our separate policies, such as Anti-Harassment and Bullying and Resolving Grievances. If you are unsure about whether your concerns are best dealt with under the Whistleblowing or Resolving Grievance Policy, please speak to:-

Concerns about sexual harassment, including harassment by parents, carers, visitors or contractors, can be reported using this form.

Mr Stephen Drew (Headteacher) contact details for schools nominated member of staff or the schools HR Provider for further advice.
On completion, please send the form to:-Mr Stephen Drew (Headteacher) who are the first points of contact for any Whistleblowing complaints.

Please note an exception to this is where your whistleblowing complaint relates to a Chair of Governing Body in which case the complaint should be addressed to the Assistant Director for Education Strategy and Improvement at Staffordshire County Council. - Mr Tim Moss (as at January 2024)

Complaints can be submitted either via an envelope marked "confidential" or sent as an email attachment with "confidential" in the subject line. If you are sending via a personal email you are strongly advised to secure your email by password protection with encryption, providing a password via an alternate method.

Once you have submitted this form, we will invoke the procedure set out in our Whistleblowing Policy and may contact you to clarify the nature of your concerns.

Formal whistleblowing concern	
Name:	
Job Title:	
Department/Business Unit:	
Date:	