Whistleblowing Policy

This policy has been entirely adopted by SCPS from the OCC model policy.

Latest version: June 2026

Version 2.3

Checked against latest OCC version: September 2026

Date of ratification by governors: 07.10.26

Date of next review: September 2027

Reviewing the Policy

1.1 This policy will be reviewed annually by the Head teacher and monitored by the governing body. This policy is wholly adopted from the OCC model policy so the annual review will check that this policy contains the latest version issued by OCC.

1.2 If no changes are found the document will be reissued with the latest check date with no further approval needed.

1.3 If changes are found the document will go through the SCPS policy approval and ratification process.

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Model Whistleblowing Procedure for Oxfordshire Schools

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A. Introduction

1. All schools and academy trusts are required to have appropriate procedures in place for handling whistleblowing and for ensuring school staff know who they can contact if they wish to raise a concern.

2. This document explains the types of concerns that can be raised under this procedure, the legal protection for whistleblowers and how whistleblowing concerns will be handled.

3. This procedure should be followed for any whistleblowing matters raised by employees of the school, supply staff and agency workers.

4. For a multi academy trust (MAT), the procedure is likely to be trust-wide and approved and reviewed at trust board level.

5. The term 'head teacher' has been used throughout this procedure, however depending on the size and structure of the school the head teacher's role in the procedure may be delegated to other members of the senior leadership team, school business managers or line managers as appropriate. Where the head teacher is subject to these procedures, it will be managed by the Chair of the governing body.

B. Policy Statement

6. Each school is committed to the highest possible standards of:

   a) openness and inclusiveness
   b) accountability and
   c) integrity.

The aim of procedure:

7. To encourage those working in the school to report suspected wrongdoing promptly, in the knowledge that their concern will be taken seriously and investigated as appropriate, and that their confidentiality will be respected as far as possible.
8. To provide guidance on how to raise concerns.
9. To reassure staff that they can raise genuine concerns made in the public interest without fear of reprisals, even if they turn out to be mistaken.

C. What is Whistleblowing?

10. Whistleblowing is the reporting by a worker of suspected wrongdoing or dangers in relation to an organisation's activities.

11. Anyone who raises any type of concern about work that they believe to be true, should be treated with respect, and should not suffer as a result. Certain types of wrongdoing or dangers that are reported are regarded as being in the public interest. This means the wrongdoing must affect

others, e.g. pupils or the general public. These are specified within The Public Interest Disclosure Act 1998 and the Employment Rights Act 1996.

12. The wrongdoing must relate to or show one of the following:

i. a criminal offence (such as fraud or theft)
ii. a failure to comply with a legal obligation or duty
iii. a miscarriage of justice
iv. a danger to the health and safety of an individual
v. sexual harassment (any unwanted behaviour of a sexual nature, as outlined in section 26(2)(a) and (b) of the Equality Act 2010);
vi. dangers to the environment
vii. deliberate concealment of information tending to show any of the above matters

13. The concern could be about something that happened in the past, is currently happening or likely to happen in the future.

14. In some cases, a concern/disclosure may be investigated under a separate policy/procedure of a school where appropriate, for example, an employment issue or poor behaviour of employees. In these cases, the school's Anti-Bullying, Harassment and Discrimination Policy and/or Grievances Model Policy will be used as the internal mechanism for dealing with the concern in the first instance.

15. There are other concerns, that may not amount to a 'qualifying disclosure', or fall into a school's employment policies, but may however meet the public interest criteria, and by way of example only may be 'value for money' concerns or poor contract management. While these may not have the same legal protection, a school will take these seriously and so the school's complaint procedure should be followed to consider and investigate with a view to resolving those concerns.

D. Legal protection for whistleblowers

16. Whistleblowers are protected by law (under The Public Interest Disclosure Act 1998) from being treated unfairly or losing their jobs because they 'blow the whistle'.

17. Whistleblowers must hold a reasonable belief that the concern they are raising is in the public interest.

18. The school's governing body will provide all reasonable protection for those who raise concerns made in the public interest.

19. The school's governing body will be responsible for ensuring that appropriate personal support is offered both to a worker raising a concern and to any worker against whom allegations have been made under this procedure.

20. If any persons raising a concern believe themselves to be suffering a detriment for having raised a concern, this should be made known to the school's governing body.

21. The law protects a whistleblower from any retaliation or discrimination which may occur, so long as they believe any "protected disclosure" to be true, it is proportionate to the circumstances and importantly that it is made to a prescribed person or relevant body only. to include reference to the for further advice regarding whether it is lawful to make a disclosure.

22. An employee is not protected or immune from other action being taken against them if making the disclosure breaks the law.

23. Any protection the whistleblower may be entitled to by law, may be compromised or lost if the disclosure is made to the press.

24. Although an employee has certain legal obligations of confidentiality to the school, in a limited set of circumstances, whistleblowing may override these obligations. This guidance sets out the circumstances under which these disclosures may lawfully be made.

E. Procedure for raising a whistleblowing concern

Whistleblowing anonymously or confidentially

25. Concerns can be raised anonymously, but the school or person receiving the allegation may not be able to take it further if they haven't been provided with all the information they need.

26. Whistleblowers can give their name but request confidentiality and, in these circumstances, every effort will be made to protect their identity.

27. All disclosures made under this procedure will be treated sensitively, consistently and fairly.

Step 1- Deciding who to report the concern to

28. Concerns can be raised verbally or in writing.

29. You can raise your concern with your line manager. Alternatively, you can raise the matter with the Head Teacher or the Chair of Governors.

30. If you wish to report the matter to someone outside of the school you can contact the Director of Children's Services, Oxfordshire County Council or any of the other local authority officers listed in Annex 1 or one of the external bodies/organisations listed in Annex 2.

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31. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice from the Chair of Governors or one of the local authority officers listed at Annex 1, before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are included in Annex 2.

32. Reporting concerns to the media, in most cases will lead to the loss of your whistleblowing law rights.

33. Although you are not expected to prove beyond doubt the truth of your concerns, you will need to demonstrate that you have sufficient evidence or other reasonable grounds to raise them.

34. You may wish to obtain advice from a trade union representative, the Citizen's Advice Bureau or Public Concern at Work on 020 7404 6609 and www.pcaw.co.uk .

35. You can be accompanied by a trade union representative or colleague to any meetings that are required.

Step 2

36. The person with whom you have raised your concern, will decide what action is needed. They may ask you to provide further information. They (or Chair of Governors if raised with someone else in the first instance) will write to you within 10 days to let you know how your concern will be dealt with.

37. The information you can expect to receive is:

- an indication of how the concern will be dealt with;
- an estimate of how long it will take to provide a final response;
- whether any initial enquiries have been made;
- whether further investigations will take place, and if not why not;
- information about support available for you.

38. The person with whom you have raised your concern will at the same time notify the schools' HR Adviser that a whistleblowing allegation has been made. If you have raised your concerns with your line manager or head teacher, they will notify the Chair of Governors.

39. It is for the Chair of Governors to determine who else within the school, if anyone should be notified (for example if you or your manager report your concern to them, they will decide whether the Head Teacher should be informed).

40. Advice on dealing with concerns is available from the school's HR Adviser, legal or financial adviser, or Governor Services for the Chair of Governors, or another

Governor who is seeking clarification or advice.

Step 3

41. Initial enquiries will be made to decide whether an investigation is appropriate.

42. An investigation may be carried out, depending on the nature of the allegations and the evidence/information presented. Full details of the investigation may be withheld from you to protect the confidentiality of other people.

43. Information will need to be passed on to those with a legitimate need to have this information and it may be necessary for you to provide a written statement and act as a witness in any subsequent disciplinary proceedings or enquiry. This will be discussed with you first.

44. Where an investigation is necessary, it may take the form of one or more of the following:

- an internal investigation by the head teacher or a governor, which may, for example, take the form of a disciplinary investigation
- an investigation by the Internal Audit Service
- a referral to the Police
- the setting up of an external independent inquiry.

Step 4

45. You will be informed of the outcome of any investigation, in writing, and/or of any action taken, subject to the constraints of confidentiality and the law.

46. If you do not feel your concern has been addressed adequately you may raise it with an independent body such as one of the following as appropriate:

- your trade union
- the Citizens Advice Bureau
- a relevant professional body or regulatory organisation
- a relevant voluntary organisation
- the Police
- the Local Government & Social Care Ombudsman
- Equality and Human Rights Commission
- NSPCC should the concern relate to a child.

(See Annex 2 for further details).

47. If there is an issue of an exceptionally serious nature which you believe to be

substantially true, then you may disclose the issue to someone other than those listed in paragraphs 29 and 30. In determining whether it is reasonable for you to have made a disclosure the identity of the person to whom the disclosure is made will be taken into account. Disclosures to anyone outside of the recognised bodies listed in Annex 1 and 2 may not be protected disclosures under the Act.

48. You have a duty to the school not to disclose confidential information. This does not prevent you from seeking independent advice at any stage or from discussing the issue with the charity Protect (previously called Public Concern at Work) on 020 3117 2520 or www.protect-advice.org.uk in accordance with the provisions of the Public Interest Disclosure Act 1998.

F. Review and Reporting of the Procedure

49. For maintained and voluntary controlled schools Oxfordshire County Council's Head of Paid Service, and the Council's Monitoring Officer, have overall responsibility for this procedure.

50. For voluntary aided and foundation schools the responsibility will lie with the Governing Body, and for academies with the Academy Trust.

51. This procedure has been reviewed with reference to equalities, human rights and discrimination legislation. Confidential monitoring of the procedures is undertaken in order to gather data to help establish whether the procedure is operated in a fair and consistent manner. In undertaking monitoring the school will not identify individuals.

52. This procedure will be regularly reviewed by the Monitoring Officer to ensure that it continues to remain compliant and meets the needs of Schools and those working in schools.

Responsible Officer: Monitoring Officer

June 2026

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Annex 1: Contact list for Oxfordshire County Council

Address: Oxfordshire County Council, County Hall, New Road, Oxford, OX1 1ND

Education Personnel Service - Professional HR Advice for Schools	Eps.consultants@hants.gov.uk 02380 383500
Governor Services – point of contact for clarification and advice for Governors.	governorservices@oxfordshire.gov.uk Tel: 0330 0249046
Local Authority Designated Officer for Safeguarding Children	jo.lloyd@oxfordshire.gov.uk 01865 810603
Health and Safety Team for Schools	healthandsafetyhelp@oxfordshire.gov.uk Tel: 03300 240849
Deputy Chief Executive (Section 151 Officer)	lorna.baxter@Oxfordshire.gov.uk County Hall, New Road, Oxford. OX1 1ND
Head of Internal Audit and Counter Fraud	sarah.cox@oxfordshire.gov.uk County Hall, New Road, Oxford. OX1 1ND WB Tel no: 01865 328573
Director of Children Services	Lisa.lyons@oxfordshire.gov.uk
Strategic People Partner for Schools & Education	michelle.higgs@oxfordshire.gov.uk
Chief Executive and Head of Paid Service	Tel no: 07354 845921 Martin.Reeves@oxfordshire.gov.uk County Hall, New Road, Oxford. OX1 1ND
Director of Law & Governance, and Monitoring Officer	anita.bradley@oxfordshire.gov.uk
Director of Adult Social Care	Karen.Fuller@oxfordshire.gov.uk
Director of Public Health and Communities	ansaf.azhar@oxfordshire.gov.uk
Director of Environment and Highways	Paul.Fermer@oxfordshire.gov.uk
Director of Economy and Place	robin.rogers@Oxfordshire.gov.uk
Your local Councillors (if you live in Oxfordshire)	Web site: www.oxfordshire.gov.uk Click on: Council>About your council>Oxfordshire councillors>Your county councillor

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Annex 2: External bodies and organisations

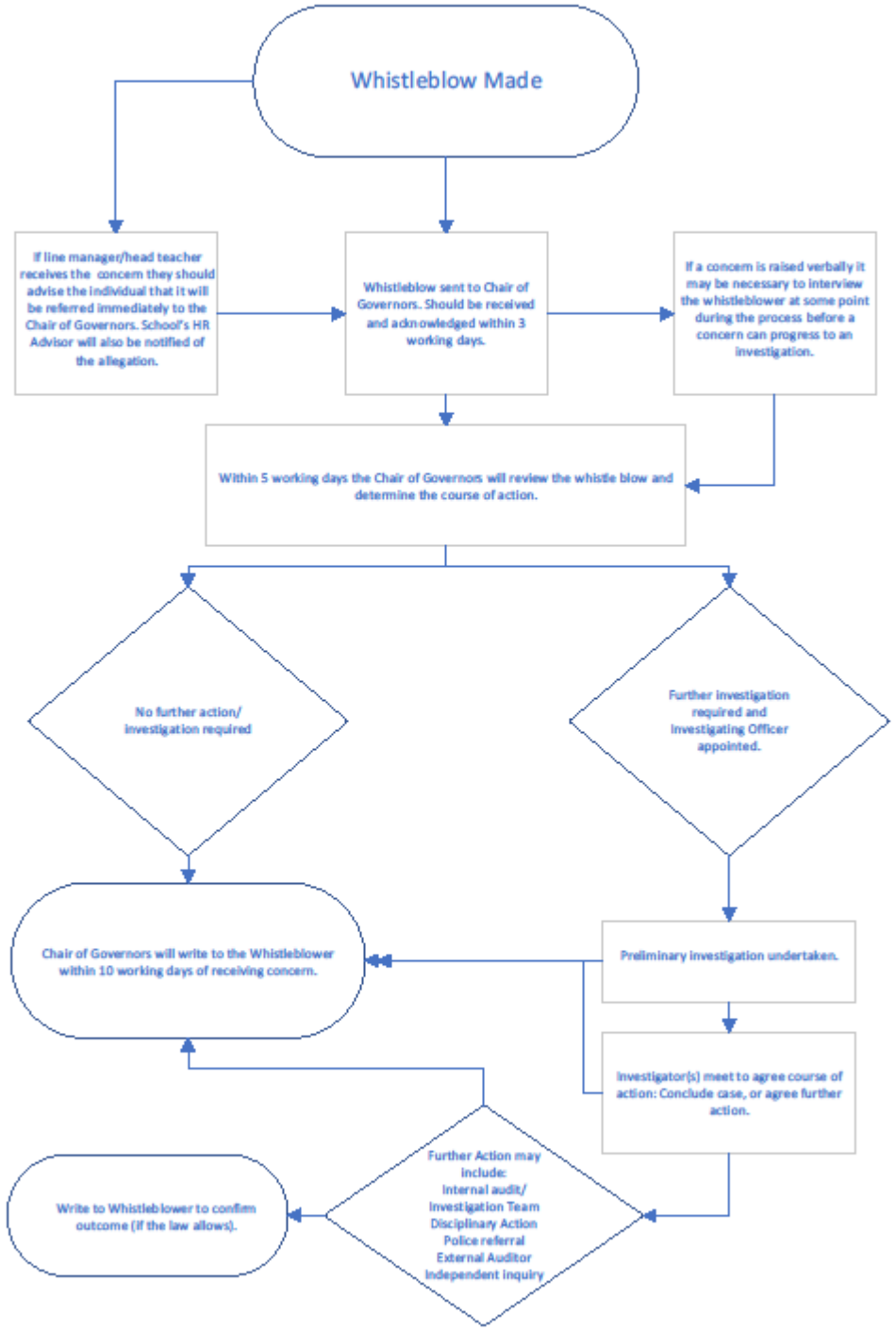
You can blow the whistle to an external organisation rather than your employer. There is a list of prescribed people or bodies that you can go to. Choose the correct one for your issue. A full list can be found online at Gov.uk: https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies

Some of the bodies that may be relevant for schools' staff are:

Ofsted	WBHL, Ofsted, Piccadilly Gate, Store Street, Manchester, M1 2WD Tel: 0300 123 3155 Email: whistleblowing@ofsted.gov.uk
Office of Qualifications and Examinations Regulation	Complaints Investigation Manager, Ofqual, Earlsdon Park, 53-55 Butts Road, Coventty, CV1 3BH. Tel: 0300 303 3344 whistleblowing@ofqual.gov.uk Online reform form: www.ofqual.gov.uk/complaints-and-appeals/whistleblowing/
National Society for the Prevention of Cruelty to Children (NSPCC)	The NSPCC Whistleblowing Advice Line is for anyone with child protection concerns in the workplace. The helpline provides support and advice to those who feel unable to get a child protection issue addressed by their employer. It can be contacted anonymously on 0800 028 0285. Whistleblowing Advice Line | NSPCC
Health and Safety Executive	Priestley House, Priestley Road, Basingstoke, Hampshire. RG24 9NW Web: www.hse.gov.uk Tel no. 0300 790 6787
The Local Government and Social Care Ombudsman	PO Box 4771, Coventry. CV4 0EH www.lgo.org.uk Tel no. 0300 061 0614
Data Protection and Freedom of Information	The Office of the Information Commissioner, Wycliffe House, Water Lane, Wilmslow, SK9 5AF Tel: 0303 123 1113
Protect Confidential advice line	www.protect-advice.org.uk / 020 3117 2520

The Equalities and Human Rights	The Equalities and Human Rights
Citizens Advice Bureau	www.citizensadvice.org.uk
Whistleblowing Helpline Free advice for NHS and Social Care	https://speakup.direct/ Tel No. 08000 724725
Police	www.gov.uk/contact-police
Trade Unions	**UNISON**: unison@oxfordshire.gov.uk 01865 815990 **GMB** info@gmb.org.uk **Teachers Unions** Association of School and College Leaders (ASCL) www.ascl.org.uk 01162 991122 National Education Union (NEU) neu.org.uk National Association of Head Teachers (NAHT) www.naht.org.uk 0300 30 30 333 The Teachers Union (NASUWT) www.nasuwt.org.uk 03330 145550

Annex 3: Whistleblowing Procedure Flow Chart



Whistle blowing procedure – text-only version.

A whistle blow is made

- If manager/head teacher receives the whistle blow individual is advised it will be referred immediately to the Chair of Governors. The School's HR Advisor will also be notified of the allegation.
- Whistle blow sent to Chair of Governors. Should be received and acknowledged within 3 working days.
- If a concern is raised verbally, it may be necessary to interview the whistleblower at some point during the process before a concern can progress to an investigation.
- Within 5 working days the Chair of Governors will review the whistle blow and determine the course of action.

If no investigation is required:

- Chair of Governors will write to complainant within 10 working days of receiving whistle blow.

If further investigation is required:

- An investigation officer will be appointed.
- The Chair of Governors will write to complainant within 10 working days of receiving the whistle blow.

Once preliminary investigation undertaken:

- Investigator(s) meet to agree course of action: conclude case or agree further action.
- Further action may include:
  - internal audit/investigation team
  - disciplinary action
  - referral to police
  - external auditor
  - independent inquiry
- The Chair of Governors will write to individual to confirm outcome (if the law allows).