

BY BROOK VALLEY CE PRIMARY SCHOOL

Whistleblowing Policy



Last Review Date: October 2026

Ratified By Governors Date: 8 October 2026

Next Review Date: October 2028

Equal opportunities lie at the heart of all that we do at By Brook Valley Primary CE School. We are committed to ensuring that every member of the school community is given the same chance as any other to access the services and support of the school.

We have carefully considered and analysed the impact of this policy on equality and the possible implications for pupils with protected characteristics, as part of our commitment to meet the Public Sector Equality Duty (PSED) requirement to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations.

This policy is designed to meet the needs of all pupils. The policy is designed to be child-centred and to make sure as far as is possible that pupils understand what is happening in their lives, why, and what options are available to them.

Our Vision

Roots to grow, wings to fly

Planted in love, growing in wisdom; flourishing and soaring, reaching new heights

At By Brook Valley we are committed to creating a positive, safe and caring Christian environment, where all members of the school and wider community will be respected and valued.

We support one another to put down strong roots within our distinctive Christian culture, growing from our core values of hope, honesty, forgiveness and friendship. In this way, we will each be the very best we can be.

This policy should be read and understood from this perspective.

Equality Impact Assessment (EIA) Part 1: EIA Screening

Policies, Procedures or Practices		Date	October 2026
EIA CARRIED OUT BY:	D Henshall	EIA APPROVED BY:	

Groups that may be affected:

Are there any concerns that the policy could have a different impact on any of the following groups? (please tick the relevant boxes)	Existing or potential adverse impact	Existing or potential for positive impact
Age (young people, the elderly: issues surrounding protection and welfare, recruitment, training, pay, promotion)		X
Disability (physical and mental disability, learning difficulties; issues surrounding access to buildings, curriculum and communication).		X
Gender Reassignment (transsexual)		x
Marriage and civil partnership		
Pregnancy and maternity		
Racial Groups (consider: language, culture, ethnicity including gypsy/ traveller groups and asylum seekers)		X
Religion or belief (practices of worship, religious or cultural observance, including non-belief)		x
Gender (male, female)		x
Sexual orientation (gay, lesbian, bisexual; actual or perceived)		x

Any adverse impacts are explored in a Full Impact Assessment

Introduction

Ofsted's Education Inspection Toolkit (2025) expects schools to have effective whistleblowing arrangements as part of safeguarding and governance.

Confidentiality and data handling must comply with UK GDPR and the Data Protection Act 2018, ensuring personal data is processed lawfully and securely.

As an academy trust, the school must also comply with the current Academy Trust Handbook

including whistleblowing procedures and financial propriety.

It also reflects Working Together to Safeguard Children 2026, which sets out multi-agency responsibilities for child protection.

This policy will be read alongside current statutory safeguarding guidance, applicable financial and governance requirements and the school's related policies and procedures.

1. All schools and academy trusts are required to have appropriate procedures in place for handling whistleblowing and for ensuring school staff and volunteers 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 whistle-blowers and how whistleblowing concerns will be handled.
3. This procedure should be followed for any whistleblowing matters raised by employees of the school (including temporary staff), volunteers and governors, supply staff, contractors and agency workers, suppliers and service providers, members of the community and members of the public.
4. 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.

Policy Statement

5. Wiltshire Council and By Brook Valley CE School are committed to the highest possible standards of:
 - openness and inclusiveness
 - accountability and
 - Integrity

The school upholds the seven Nolan principles of public life, it expects all employees (including agency staff) to maintain these standards in everything they do. Employees, and others the school deal with (including governors, suppliers and those providing services to the school), are therefore encouraged to report any wrongdoing by the school or its employees that fall short of these standards.

This policy and procedure comply with the Public Interest Disclosure Act 1998 ("**PIDA**") and the Enterprise and Regulatory Reform Act 2013. The school may apply this procedure to concerns raised by people who do not fall within the statutory definition of a worker, but this does not mean that they acquire statutory protection under PIDA.

What is Whistleblowing?

6. Whistleblowing is when an employee or volunteer raises concerns about poor or unsafe practice, misconduct and/or potential failures in the school's systems and processes.

7. The wrongdoing disclosed must be in the public interest. This means it must affect others, e.g., pupils, general public
8. The wrongdoing must relate to or show one of the following:
 - a criminal offence
 - a failure to comply with a legal obligation
 - a possible miscarriage of justice
 - a Health & Safety risk
 - actions causing, or likely to cause damage to the environment
 - misuse of public money
 - corruption or unethical conduct
 - failing to safeguard and promote the welfare of children
 - deliberate concealment of any of these matters
 - any other substantial and relevant concern.
9. The concern could be about something that happened in the past, is currently happening or likely to happen in the future.
10. When an individual blows the whistle, they are raising a concern about a danger or illegality that affects others (for example customers, members of the public, or their employer). The person blowing the whistle is usually not directly, personally affected by the danger or illegality. Consequently, the whistleblower rarely has a personal interest in the outcome of any investigation into their concern, they are simply trying to alert others.
11. When an individual complains or raises a grievance, they are saying that they have been personally treated poorly. This poor treatment could involve a breach of their individual employment rights or bullying, and the complainant is seeking redress or justice for themselves. The person making the complaint therefore has a vested interest in the outcome of the complaint and for this reason, is expected to prove their case.
12. Concerns or complaints that employees wish to raise formally, about their own employment, should normally be raised using the school's Grievance Procedure, unless the employee believes the concern is in the public interest. This includes for example, concerns related to working conditions, working relations, employment rights or bullying or harassment.

Aim of procedure

13. Encourage those working and volunteering in the school to report suspected wrongdoing promptly, in the knowledge that it will be taken seriously.
14. Provide guidance on how to raise concerns
15. Reassure staff that they are able to raise genuine concerns made in the public interest without fear of reprisals, even if they turn out to be mistaken

16. Appropriate whistleblowing procedures should be put in place for such concerns to be raised with the school's senior leadership team.

Legal protection for whistleblowers

17. It can be difficult for an employee or worker to make the decision to report a concern.
18. The school will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect an individual when they raise a concern even if they are genuinely mistaken in their concerns. Any harassment or victimisation of a whistleblower would result in disciplinary action against the person responsible.
19. Under The Public Interest Disclosure Act (PIDA) 1998, a worker does not need to prove that wrongdoing has occurred. To qualify for statutory protection, the worker must have a reasonable belief that the disclosure is made in the public interest and that the information disclosed tends to show one or more of the types of wrongdoing covered by the legislation. The Public Interest Disclosure Act 1998, as amended, provides legal protection in certain circumstances to workers who make qualifying disclosures. It is unlawful to subject a worker to detriment or dismiss them because they have made a protected disclosure.

False and malicious allegations

20. The school will protect itself and its employees from false and malicious expressions of concern by taking disciplinary action where appropriate. The school will try to ensure that the negative impact of either malicious or unfounded allegation about any person is minimised. Escalation routes include contacting the Education and Skills Funding Agency (ESFA) for academy financial concerns, and prescribed bodies listed on Gov.uk.

Procedure for raising a whistleblowing concern

21. Whistleblowing anonymously or confidentially
22. 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. Factors considered when deciding whether an anonymous disclosure can be investigated are:
- Ability to obtain the necessary information
 - Seriousness
 - Specific nature of the concern; and
 - Duty to the public
23. To protect the person making the disclosure and the school, an initial assessment will be carried out to decide whether a full investigation is appropriate and, if so, what

form it should take. The initial assessment may be carried out internally or the school may (via Wiltshire Council) ask another body (e.g. SWAP) to carry it out. Concerns or allegations, which, fall within the scope of specific procedures (for example fraud, theft and corruption) will normally be referred to SWAP for consideration under those procedures.

24. If a full investigation is required, this will be carried out by the school internally or the school may ask another body (e.g. SWAP) to carry it out in accordance with Annex 3 (Investigation Arrangements). Following the full investigation, the school will either resolve by agreed action or take appropriate further action. This further action could be:
- Agreed steps such as disciplinary process.
 - Referral to the Police.
 - An independent enquiry.

The school will seek advice from their HR Advisor before determining whether SWAP Internal Audit must be notified of all initial assessments and full investigations raised under the Whistleblowing Policy and their outcome. Contact details for SWAP' are confidential@swapaudit.co.uk

25. Whistle blowers can give their name but request confidentiality and, in these circumstances, every effort will be made to protect their identity.
26. Where an employee has requested that their identity is not to be revealed, the school will discuss the matter with them before embarking on any course of action whereby their identity will need to be disclosed.
27. All disclosures made under this procedure will be treated sensitively, consistently, and fairly.

Step 1- Reporting the concern

28. Concerns can be raised verbally or in writing. Normally it is preferable to put the concern in writing. A person raising a disclosure is invited to set out the background and history of the concern, giving names, dates and places where possible, and the reason why they are particularly concerned about the situation.
29. The earlier a concern is expressed, the easier it is to take action. The person making the disclosure should not wait until they have proof. Although they are not expected to prove the truth of the allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for their concern.

N.B. If an employee has any personal interest in the matter this should be disclosed at the outset.

30. You can raise your concern with a member of the Senior Leadership Team (SLT). Alternatively, you can raise the matter with the headteacher. If you are raising a concern about the headteacher then the matter should go directly to the Chair of Governors.

31. Concerns relating specifically to safeguarding or the wellbeing of a child should normally be raised with the school's Designated Safeguarding Lead. Concerns relating to SEND provision or arrangements should normally be raised with the SENDCo. Nothing in this paragraph prevents a person from using another reporting route under this policy where appropriate.
32. Whistleblowing concerns should be raised with the school's senior leadership team. In By Brook Valley CE School this is:
 - DSL - Head Teacher - Deborah Henshall
 - SENDCo – Benjamin Summers
 - Chair of Governors – Merope Sylvester
 - Safeguarding & Whistleblowing Governor - Jaclyn Cross
33. Where a staff member or volunteer feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:
34. If you wish to report the matter to someone outside of the school, you can contact:
 - the Head of School Effectiveness at Wiltshire Council or
 - any of the other local authority officers listed in Annex 1 or
 - one of the external bodies/organisations listed in Annex 2.
 - the [NSPCC's whistleblowing helpline](#) – it is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.
35. Workers are strongly encouraged to seek independent advice before making a disclosure to the media or another person or organisation not identified in this policy, as the statutory conditions for protection of wider disclosures are more stringent
36. 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.
37. You may wish to obtain advice from a trade union representative or the Citizen's Advice Bureau.
38. You can be accompanied by a trade union representative or colleague to any meetings that are required.

Step 2

39. The person with whom you have raised your concern, will decide what action is needed. Within ten working days of a concern being raised, and following the initial assessment, the Headteacher (or their nominee)/the Chair of Governors if the complaint is against the Headteacher* will write to the person raising the concern to.
 - acknowledge that the concern has been received,

- indicate the initial findings and how they propose to deal with the matter; and
- give an estimate of how long it will take to provide a final response.

Should further information be required, initial findings will be provided to the person raising the concern within four working days of the additional information requested being received by the school.

40. 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
 - information about support available for you.
41. 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.
42. Advice on dealing with concerns is available from the school's HR Adviser, legal or financial adviser.

Step 3

43. Where the initial assessment determines that further investigation is appropriate, an investigation will be undertaken having regard to the arrangements in Annex 3.
44. 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.
45. 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.
46. Where an investigation is necessary, it may take the form of one or more of the following:
 - an internal investigation by the headteacher 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

47. 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 in line with the Annex 3 (Investigatory Arrangements).

48. If you do not feel your concern has been addressed adequately you may raise it with the Chair of Governors (or, if the Chair is involved, the Vice Chair of Governors) in the first instance and then, if necessary, escalate to an independent body such as:
- the Head of School Effectiveness at Wiltshire Council or
 - any of the other local authority officers listed in Annex 1 or
 - one of the external bodies/organisations listed in Annex 2.
49. 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 paragraph 26. 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 qualify for statutory protection. Independent advice should therefore be sought where appropriate
50. 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.

Related policies and procedures

This policy should be read alongside the school's:

- Staff Code of Conduct
- Governor Code of Conduct
- Grievance Procedure
- Disciplinary Procedure
- Safeguarding and Child Protection Policy
- Complaints Procedure
- Health and Safety Policy
- relevant financial policies and procedures.

Review and Reporting of the Procedure

51. The responsibility will lie with the Governing Body.
52. 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.
53. The Headteacher will report to the Governing Body on the operation of this policy. Reports will be anonymised and will identify the number and broad themes of whistleblowing disclosures, including year-on-year trends where appropriate. The Governing Body will consider any actions required to improve the school's systems, controls, policies or procedures.

54. This procedure will be regularly reviewed by the board at least every two years (or earlier following relevant legislative, regulatory or local authority changes) to ensure that it continues to remain compliant and meets the needs of the school and those working in the school.

Whistleblowing by Members of the Public

55. Unlike disclosures by employees, Public Interest Disclosure Act 1998 (PIDA) does not offer legal protection for disclosures made by members of the public. However, the school will take reasonable and appropriate action to protect members of the public when they disclose a concern.
56. The school considers that any such disclosure made by members of the public in respect of serious misconduct should be handled in the same way as concerns raised by employees.
57. Once a disclosure from a member of the public has been received by the school, it will be handled in the same way as concerns raised by employees, unless it is considered more appropriate for the concerns to be dealt with using the School's Complaints Procedure or any other procedure as appropriate.
58. The school will liaise with their HR Advisor to decide whether to notify SWAP Internal Audit of all concerns, initial investigations and full investigations raised by members of the public under the Whistleblowing Policy **and their outcome using SWAP's email address: - confidential@swapaudit.co.uk**

Annex 1 - Contact list for Wiltshire County Council

Address:	Wiltshire Council, County Hall
Role: Name of Post Holder	Contact email address
Employee Relations Service Manager – Helen Strong	Helen.strong@wiltshire.gov.uk
Director of Education and Skills – Kathryn Davis	kathryn.davis@wiltshire.gov.uk
Interim Head of School Effectiveness – Nick Chinnock	nick.chinnock@wiltshire.gov.uk
Head of Health and Safety – Fee Nunn	fee.nunn@wiltshire.gov.uk
Strategic Financial Support Manager Finance & Procurement – Grant Davis	Grant.davis@wiltshire.gov.uk

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 school 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, Coventry, CV1 3BH.
Tel: 0300 303 3344
Email: 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.
[NSPCC's whistleblowing helpline](http://www.nspcc.org.uk/whistleblowing)
- **Health and Safety Executive**
Tel: 0300 790 6787
www.hse.gov.uk
- **The Local Government Ombudsman**
Address: PO Box 4771, Coventry. CV4 0EH
www.lgo.org.uk
Tel: 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
- **Secretary of State for Education**

Ministerial and Public Communications Division, Department for Education, Piccadilly Gate, Store Street, Manchester, M1 2WD
Tel: 0370 000 2288
Website: www.gov.uk/contact-dfe

- **Equality and Human Rights Commission**

Tel: 0161 829 8100

Email: whistleblowing@equalityhumanrights.com

Website: www.equalityhumanrights.com/whistleblowing

Annex 3 – Investigation Arrangements

1. The Headteacher (or their nominee) will seek advice from their HR Advisor before determining whether SWAP Internal Audit must be notified for all initial assessments and full investigations raised under the Whistleblowing Policy and their outcome. Contact details for SWAP' is confidential@swapaudit.co.uk
2. On notification of the concern, the Headteacher (or their nominee) will seek advice from their HR Advisor before determining whether SWAP is required to conduct the initial assessment of the concern or whether the school shall itself conduct the initial assessment.
3. All initial assessments will be undertaken by the Headteacher (or their nominee) unless it is determined that the school requires or SWAP Internal Audit Services to take on this role.
4. The Headteacher (or their nominee) will require that any initial assessment or full investigation carried out by SWAP Internal Audit Services, will adopt the following good practice points:
 - Deal promptly with the allegation or concern.
 - Contact the Police and other agencies as appropriate at an early stage and keep them and the employee who reported the concern informed of progress.
 - Prepare a background or objectives statement and consider the likely outcome, i.e. prosecution and/or internal disciplinary action.
 - Record all evidence received, ensure that it is sound, adequately supported and kept secure.
 - Notify the school's insurers where appropriate.
 - Identify actions required, systems weaknesses and lessons learnt.

5. Any initial assessment or full investigation carried out by the school and/or other investigative teams shall adopt similar good practice points where relevant.