



HOLTON SLEAFORD

— INDEPENDENT SCHOOL —

Whistleblowing Policy

Overview

At Holton Sleaford Independent School, we seek to run all aspects of business and activity with full regard for high standards of conduct and integrity. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring and to address them when they do occur.

This policy covers all associates of Holton Sleaford Independent School but does not form part of any employee's contract of employment and it may be amended at any time.

This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work.

Roles, Responsibilities, and Implementation

The Governing Body and Proprietors have overall responsibility for the effective operation of this policy, for ensuring compliance with the relevant statutory framework and for reviewing the effectiveness of actions taken in response to concerns raised under this policy. The Governing Body and Proprietors delegates responsibilities for operating this policy and ensuring its maintenance and review to the Executive Headteacher.

All members of staff have a specific responsibility for supporting colleagues and ensuring its success.

Objectives

The objectives of this policy are:

- To encourage employees to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.

- To provide employees with guidance as how to raise those concerns.
- To reassure employees that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

What is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity
- failure to comply with any legal or professional obligation (or regulatory requirements)
- miscarriages of justice
- danger to health and safety
- bribery
- financial fraud or mismanagement
- negligence
- breach of the school's internal policies and procedures
- conduct likely to damage the school's reputation
- unauthorised disclosure of confidential information
- inappropriate use of school assets or funds
- the deliberate concealment of any of the above matters

This list is not exhaustive.

A whistleblower is a person who raises a genuine concern relating to any of the above. If an employee has any genuine concerns related to suspected wrongdoing or danger affecting any of the school's activities (a whistleblowing concern), they should report it under this policy.

This policy should not be used for complaints relating to a member of staff's own personal circumstances, such as the way they have been treated at work. In such cases, they should use the school's Complaint Policy.

If an employee is uncertain whether something is within the scope of this policy, they should seek advice from the Executive Headteacher.

Raising a Whistleblowing Concern

Employees should be able to discuss any concerns about wrongdoings or dangers at work as part of the normal professional interaction between them and their line manager and, in many cases, these will be dealt with to mutual satisfaction. Alternatively, an employee may wish to raise any concerns with their line manager

more formally, either in person or in writing. The line manager may be able to agree a way of resolving the concern quickly and effectively.

However, where the matter is more serious, or the employee feels that their line manager has not addressed their concern, or they prefer not to raise it with them for any reason, they should contact the Governing Body.

The Governing Body will arrange a meeting with the employee as soon as possible to discuss their concern. The employee may bring a colleague to any meetings under this policy. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

The school will record a written summary of the concern and provide the employee with a copy after the meeting. The school will also aim to provide an indication of how it proposes to deal with the matter.

Consultants, contractors, and volunteers (other than members, trustees, and governors) should raise any whistleblowing concerns directly with the Governing Body.

Confidentiality

The school hopes that employees will feel able to voice whistleblowing concerns openly under this policy. However, if an employee wants to raise a concern confidentially, the school will make every effort to conceal their identity. If it is necessary for anyone investigating the concern to know the employee's identity, the school will discuss this with the employee first.

The school does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if it cannot obtain further information. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Governing Body and appropriate measures can then be taken to preserve confidentiality. If the employee is in any doubt, advice is available from Protect, the independent whistleblowing charity, which offers a confidential helpline, 02031172520.

Investigation and Outcome

Once an employee has raised a concern, the school will carry out an initial assessment to determine the scope of any investigation. The school will inform the employee of the outcome of the assessment. The employee may be required to attend additional meetings to provide further information.

In some cases, the school may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable the school to minimise the risk of future wrongdoing.

The school will aim to keep the employee informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the school giving specific details of the investigation or any disciplinary action taken as a result. The employee should treat any information about the investigation as confidential.

If the school concludes that a whistleblower has made false accusations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

After an Investigation

While the school cannot always guarantee the outcome an employee may be seeking, it will try to deal with concerns fairly and in an appropriate way. By using this policy, members of staff can help the school to achieve this.

If an employee has genuine concerns about how the school has handled their whistleblowing disclosure, they can write to the Chair of Governors. The Chair of Governors may investigate whether this policy's procedures have been followed in the case in question and notify the employee of their findings accordingly.

External Disclosures

The objective of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases, an employee should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for an employee to report their concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. The school strongly encourages its members of staff to seek advice before reporting a concern to anyone external. The independent whistleblowing charity Protect, operates a confidential helpline, 02031172520.

Whistleblowing concerns usually relate to the conduct of school staff, but they may sometimes relate to the actions of a third party. In some circumstances, the law will protect an individual if they raise the matter with the third party directly.

However, the school encourages its staff to report such concerns internally first. Employees should contact their line manager for guidance.

Protection and Support for Whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. The school aims to encourage openness and will support employees who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment because of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If an employee believes that they have suffered any such treatment, they should inform the Governing Body immediately.

Members of staff must not threaten or retaliate against whistleblowers in any way. Any employee involved in such conduct may be subject to disciplinary action.

Contact Numbers

Local Authority Designated Officer - 01522 554674

Safeguarding Governor - Chris Armond 07862275518

Sleaford Police Station - 01529 532222

<u>Written by...</u>	<u>Mike Whatton</u>	<u>15/11/25</u>
<u>Approved by...</u>	<u>Will Scott</u>	<u>15/11/25</u>
<u>Signed...</u>		
<u>Date sent to Governors</u>		<u>Due for Review</u>
<u>Date approved by Governors</u>		<u>14/11/26</u>