Whistleblowing Policy

More Than Ed | Independent School

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Responsible Person: Charlie Hopkins

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1. Purpose

This policy establishes clear procedures for raising concerns about wrongdoing or malpractice within More Than Ed, ensuring that staff can report concerns safely and confidentially without fear of reprisal. The policy demonstrates our commitment to openness, transparency, and accountability while recognising the particular vulnerabilities and sensitivities inherent in our specialist SEMH school.

2. Scope and Application

This policy applies to all individuals working at or with the school, including permanent and temporary teaching staff, support staff, therapeutic practitioners, administrative personnel, contracted staff, agency workers, volunteers, and anyone providing services to the school. The policy covers concerns raised about activities within the school, activities of staff members that impact their work or the school's reputation, and the conduct of external organisations or individuals in their dealings with the school. While this policy specifically addresses whistleblowing concerns that are in the public interest, individual grievances about personal employment matters should be raised through the Grievance Procedure unless they relate to a wider concern about malpractice.

3. Legal Framework and Protection

This policy has been developed in accordance with the Public Interest Disclosure Act 1998, which provides legal protection for workers who raise genuine concerns about malpractice. Staff who raise genuine concerns under this policy will be protected from dismissal, harassment, victimisation, or any other detriment as a result of whistleblowing. The school recognises that the decision to report a concern can be difficult, particularly in a small specialist school environment where working relationships are close and intensive. We are committed to ensuring that anyone raising concerns in good faith will be supported throughout the process and protected from any negative consequences.

4. Definition of Whistleblowing

What is Whistleblowing

Whistleblowing is the disclosure of information about suspected wrongdoing or malpractice within an organisation that is in the public interest. In an educational context, and particularly within SEMH provision, this takes on additional significance as we work with vulnerable young people who depend on us for their safety, wellbeing, and development. Whistleblowing is distinct from raising a grievance, which relates to an individual's personal employment situation, although the two may overlap where individual treatment is symptomatic of wider organisational failings.

Types of Concerns Covered

This policy covers concerns that fall within the public interest, where there is reasonable belief that malpractice is occurring, has occurred, or is likely to occur. Given our work with vulnerable students in an SEMH setting, concerns may include but are not limited to safeguarding failures or concerns about child protection practices that are not being properly addressed through normal channels. Financial irregularities including fraud, corruption, or misuse of school funds particularly where this impacts on provision for vulnerable students require immediate attention. Criminal offenses being committed within the school or by staff members in connection with their work must be reported through appropriate channels.

Health and safety risks that endanger students, staff, or visitors are particularly significant in our context where students may have limited ability to protect themselves or report concerns. Breaches of data protection are especially serious given the sensitive nature of information we hold about students with SEMH needs, including medical, psychological, and family information. Discrimination, harassment, or bullying that creates an unsafe environment for students or staff undermines our therapeutic approach and must be addressed. Academic malpractice including falsification of student records or assessment data represents a fundamental breach of educational integrity.

Environmental damage caused by school activities, though less common, remains within scope of this policy. Deliberate concealment of any of the above matters, including attempts to suppress concerns raised by others, represents a serious breach of trust. Failure to comply with legal or regulatory obligations including those set by ISI, OFSTED, or local authorities could jeopardise our registration and ability to support vulnerable students. Abuse of position or authority for personal gain or to the detriment of students represents a fundamental breach of professional standards in an SEMH setting where power dynamics are carefully managed.

SEMH-Specific Concerns

Working in an SEMH environment presents unique situations that may give rise to whistleblowing concerns. The use of inappropriate restraint or physical intervention that does not comply with our Relational Support Policy represents both a safeguarding issue and a departure from trauma-informed practice. Failure to follow agreed Relational Management Plans or risk assessments could endanger both students and staff while undermining therapeutic progress. Breach of therapeutic boundaries or exploitation of vulnerable students' emotional dependencies violates fundamental professional standards.

Inadequate supervision or staffing levels that compromise student safety become particularly serious given our students' additional vulnerabilities and support needs. Failure to provide agreed therapeutic interventions or support services may constitute neglect of students with identified mental health needs. Misuse of medication or failure to follow medical protocols poses serious risks to students who may be unable to advocate for themselves. Discrimination against students based on their mental health conditions, behavioural presentations, or additional needs contradicts our fundamental mission and values.

5. Internal Reporting Procedures

Initial Considerations

Before raising a concern, staff should consider whether the matter falls within the scope of this whistleblowing policy or whether it would be more appropriately addressed through other procedures such as the grievance policy for personal employment matters or the safeguarding policy for immediate child protection concerns. However, if there is any doubt about the appropriate route, staff should err on the side of caution and raise the concern, as it can be redirected if necessary. The school recognises that staff working in our intensive 1:1 model may have unique insights into potential problems and encourages the reporting of concerns even if all facts are not immediately clear.

Stage 1: Line Manager Reporting

In most cases, concerns should initially be raised with your immediate line manager or the appropriate member of the Senior Leadership Team (SLT). Given our 1:1 staffing model where staff work closely with individual students, your team leader or supervising teacher would typically be the first point of contact. Concerns can be raised verbally or in writing, though written reports help ensure all relevant details are captured. If raising the concern verbally, you should be prepared to provide a written statement subsequently.

When raising a concern at this stage, you should provide background information and context including relevant dates, times, and locations. Clearly explain the reason for your concern, identifying what practice or behaviour you believe constitutes malpractice. Include details of any evidence you have or where evidence might be found, though you are not expected to prove the truth of your allegation. Name any other individuals who may have relevant information or who have witnessed the concerning behavior. Indicate any immediate risks to students or others that require urgent action.

Stage 2: Senior Leadership Escalation

If you feel unable to raise the concern with your line manager, perhaps because they are involved in the suspected malpractice or you believe they will not take appropriate action, you should raise the matter directly with the Proprietor/Head Teacher. Given the dual role held by the Proprietor/Head Teacher, concerns can also be raised with the Deputy Head or another member of the SLT if more appropriate. In situations where speed is essential, particularly those involving immediate risk to students, you should escalate directly to SLT without delay.

The Proprietor/Head Teacher or designated senior leader will arrange to meet with you as soon as possible and within 5 working days of receiving your concern. This meeting will be held in confidence to understand the nature of your concern and determine the appropriate course of action. You may be accompanied by a trade union representative or workplace colleague if you wish, though the confidential nature of the concern must be maintained.

Stage 3: Independent Escalation

Where concerns involve the Proprietor/Head Teacher directly, or where you believe the internal response has been inadequate, concerns should be raised with the Independent HR Consultant who provides external oversight for the school. The HR Consultant's contact details are available from the school office and are included in the staff handbook. The HR Consultant has authority to investigate concerns independently and to commission external investigations where necessary.

The Independent HR Consultant will acknowledge receipt of your concern within 3 working days and will arrange to discuss the matter with you either in person or via secure video conference. They will determine the most appropriate course of action, which may include conducting an independent investigation, commissioning an external investigator, or referring the matter to appropriate external bodies. Throughout this process, your identity will be protected unless disclosure is legally required or you provide explicit consent.

Safeguarding Concerns

Notwithstanding the above procedures, any concerns about safeguarding or child protection must be reported immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL. If concerns involve the DSL, they should be reported directly to the Proprietor/Head Teacher. If they involve both the DSL and Proprietor/Head Teacher, the concern should be reported directly to the Local Authority Designated Officer (LADO). The paramount importance of child protection means that normal whistleblowing procedures may be superseded by statutory safeguarding requirements, including mandatory reporting to external agencies.

6. Investigation Process

Initial Assessment

Upon receiving a whistleblowing disclosure, the designated recipient will conduct an initial assessment to determine the appropriate course of action. This assessment will consider whether the concern falls within the whistleblowing policy, the seriousness and urgency of the matter, whether immediate action is needed to protect students or preserve evidence, and whether the matter should be referred to external agencies such as the police, LADO, or regulatory bodies. The assessment will also determine who should lead any internal investigation, ensuring they have appropriate seniority, independence, and expertise.

Formal Investigation

Where a formal investigation is required, an investigating officer will be appointed within 5 working days of the initial assessment. For serious concerns or those involving any of SLT, an external investigator may be commissioned to ensure independence and objectivity. The investigating officer will have full access to relevant documentation and personnel, though safeguarding confidentiality where appropriate. Given our SEMH context, investigations involving students will be conducted sensitively, recognising their vulnerabilities and ensuring appropriate support is in place.

The investigation process will typically involve reviewing relevant documentation including policies, procedures, records, and correspondence. Interviews will be conducted with relevant parties, ensuring appropriate support for any students involved. Physical evidence will be examined where applicable, and expert advice may be sought on technical or specialist matters. The investigation will aim to establish facts rather than apportion blame, though disciplinary proceedings may follow if misconduct is identified.

Communication During Investigation

The whistleblower will receive written acknowledgment of their concern within 5 working days of disclosure, confirming how the matter will be handled. While detailed information about the investigation may be restricted by confidentiality requirements, the school commits to keeping the whistleblower informed about progress at appropriate intervals. This includes notification when the investigation commences, updates on expected timescales, and confirmation when the investigation concludes. Where possible and appropriate, the whistleblower will be informed of the outcome and any actions taken, though details may be limited by data protection and confidentiality obligations.

Investigation Timescales

The school aims to complete investigations within 30 working days of the concern being raised, though complex matters may require longer. Where investigations are likely to exceed this timeframe, the whistleblower will be informed of the reasons for delay and provided with a revised timeline. In cases requiring external investigation or involvement of statutory agencies, timescales may be determined by those external bodies. Throughout any extended investigation, the school will maintain appropriate interim measures to protect students and maintain safe operations.

7. External Reporting

Regulatory Bodies

While the school encourages internal reporting in the first instance, we recognise that there may be circumstances where external reporting is appropriate or necessary. Staff have the right to raise concerns directly with relevant regulatory bodies including Independent Schools Inspectorate (ISI) for concerns about educational standards or safeguarding, OFSTED for serious safeguarding failures, and the LADO for allegations against staff. The Education and Skills Funding Agency can be contacted for financial irregularities in relation to any government funding.

The Health and Safety Executive should be contacted for serious health and safety breaches that pose immediate risk. The Information Commissioner's Office handles serious data protection breaches, particularly those involving sensitive student data. The Charity Commission may be relevant if the school has charitable status and concerns relate to governance or charitable funds. The Environment Agency addresses environmental damage or pollution concerns.

Prescribed Persons

Under the Public Interest Disclosure Act, certain individuals and bodies are designated as 'prescribed persons' to whom protected disclosures can be made. These include regulatory bodies mentioned above as well as Members of Parliament, particularly where concerns relate to systemic failures or where regulatory bodies have failed to act. The National Audit Office can investigate concerns about public funds, while the Police should be contacted directly where criminal activity is suspected and internal reporting would not be appropriate.

Considerations for External Reporting

Before making an external disclosure, staff should consider whether they have already raised the concern internally and given the school reasonable opportunity to address it, unless circumstances make internal reporting inappropriate. The seriousness and urgency of the concern may justify immediate external reporting, particularly where students are at immediate risk. Evidence of cover-up or likelihood that evidence will be destroyed if reported internally would justify external reporting. Where the concern involves the most senior leadership and independent oversight mechanisms have been exhausted or are compromised, external reporting becomes necessary.

Staff should be aware that external disclosures may not maintain the same level of confidentiality as internal procedures, and their identity may become known. However, legal protections against detriment remain in place for genuine whistleblowing disclosures made in good faith and in the public interest.

8. Protection and Support for Whistleblowers

Confidentiality

The school will make every effort to maintain the confidentiality of whistleblowers who request it. However, there may be circumstances where confidentiality cannot be maintained, including where disclosure is required by law or court order, where the concern involves safeguarding and the whistleblower is the only witness, where maintaining confidentiality would impede a criminal investigation, or where the whistleblower agrees to be identified to facilitate investigation.

Even where identity must be disclosed, this will be limited to those who need to know, and the whistleblower will be informed before any disclosure occurs unless legal requirements prevent this. The school recognises that in our small, specialist setting, maintaining anonymity can be particularly challenging, and additional support measures may be needed.

Protection from Detriment

The school is committed to protecting whistleblowers from any form of detriment resulting from raising genuine concerns. This includes protection from dismissal or disciplinary action, denial of promotion, training, or other opportunities, harassment or victimisation by colleagues, and changes to duties or working conditions that could be considered punitive. Given our 1:1 staffing model, we will ensure that staff raising concerns are not disadvantaged in their team allocations or student assignments.

Any employee who victimises or retaliates against a whistleblower will face disciplinary action, potentially including dismissal for gross misconduct. The school will actively monitor the treatment of whistleblowers following their disclosure and will intervene promptly if any detriment is identified or suspected.

Support Mechanisms

Recognising that raising concerns can be stressful, particularly in our close-knit SEMH environment, the school provides comprehensive support including access to the Employee Assistance Programme for confidential counseling and advice. Additional supervision or mentoring can be arranged to provide professional support throughout the process. Where appropriate, temporary adjustments to working arrangements may be made to reduce stress or avoid difficult situations. Trade union representatives can provide support and advocacy throughout the process.

For concerns involving students they work with directly, staff may be offered temporary redeployment to other duties while maintaining their usual terms and conditions. This is a supportive rather than punitive measure, recognising the emotional impact of whistleblowing in an SEMH context where professional relationships are particularly important.

False or Malicious Allegations

While the school encourages the reporting of genuine concerns and will protect those who raise them in good faith, deliberately false or malicious allegations represent a serious breach of trust and professional standards. Employees who make allegations that they know to be false or with malicious intent will face disciplinary action, potentially including dismissal. However, the school recognises that genuine concerns may sometimes prove unfounded, and no action will be taken against employees who raise concerns in good faith that are not subsequently substantiated.

9. Governance and Oversight

Role of the Proprietor/Head Teacher

The Proprietor/Head Teacher holds ultimate responsibility for the culture and systems that support effective whistleblowing within the school. This includes ensuring this policy is properly implemented and communicated, creating an environment where staff feel safe to raise concerns, and responding appropriately and promptly to disclosures. The Proprietor/Head Teacher will personally handle serious concerns unless they are implicated in the disclosure, in which case the Independent HR Consultant assumes this responsibility.

The dual role of Proprietor/Head Teacher creates particular responsibilities for maintaining systems that allow concerns about their own conduct to be raised and investigated independently. This includes maintaining the relationship with the Independent HR Consultant, ensuring staff have access to independent reporting routes, and cooperating fully with any independent investigations.

Independent Oversight

The Independent HR Consultant provides crucial external oversight of the whistleblowing process, particularly given our governance structure. Their responsibilities include serving as an independent point of contact for concerns that cannot be raised internally, conducting or commissioning independent investigations where necessary, providing annual reports on whistleblowing matters while maintaining confidentiality, and advising on policy development and best practice.

The HR Consultant has direct access to external regulatory bodies and can make referrals without requiring internal authorisation where necessary to protect students or ensure legal compliance. This independence is particularly important in a small school where internal relationships may complicate reporting.

Annual Reporting

An annual whistleblowing report will be prepared by the Independent HR Consultant for review by the Proprietor/Head Teacher and SLT. This report will include the number and types of concerns raised, general outcomes while maintaining confidentiality, identification of any patterns or systemic issues, and recommendations for policy or practice improvements. Where concerns have involved the Proprietor/Head Teacher, a separate confidential report may be prepared for relevant regulatory bodies.

10. Training and Awareness

Staff Training

All staff receive training on the whistleblowing policy as part of their induction, ensuring they understand what constitutes a whistleblowing concern, how to raise concerns through appropriate channels, the protections available to whistleblowers, and their responsibilities if they receive a whistleblowing disclosure. This training is contextualised to our SEMH setting, with specific examples relevant to our student population and working practices.

Annual refresher training reinforces key messages and updates staff on any policy changes or learning from previous cases. Given our 1:1 staffing model, training emphasises the unique position staff are in to observe concerning practices and their professional duty to report them. Scenario-based training helps staff recognise potential whistleblowing situations and understand the distinction between whistleblowing and other reporting procedures.

Creating a Positive Reporting Culture

The school actively promotes a culture where raising concerns is seen as a professional responsibility rather than disloyalty. This involves senior leadership regularly reinforcing the importance of speaking up about concerns, sharing appropriately anonymized examples of where whistleblowing has led to positive changes, and celebrating improvements made as a result of concerns raised. Team meetings include standing items on safeguarding and practice concerns, normalising the discussion of potential issues.

Given the emotionally demanding nature of SEMH work, we recognise that staff may sometimes struggle to distinguish between acceptable challenge and concerning practice. Supervision and reflective practice sessions provide safe spaces to discuss observations and concerns, helping staff develop confidence in their professional judgment.

Accessibility

This policy is readily available to all staff through multiple channels including the staff handbook, school intranet, and staff notice boards. Key contact information for raising concerns, including the Independent HR Consultant's details, is prominently displayed in staff areas. The policy is reviewed with staff representatives to ensure it remains accessible and understandable, with plain English used throughout to ensure clarity.

Alternative formats are available for staff with specific accessibility needs, and translation services can be arranged where English is not a first language. The school ensures that all staff, regardless of their role or employment status, have equal access to whistleblowing procedures and protections.

11. Monitoring and Review

Policy Review Process

This policy undergoes comprehensive annual review to ensure it remains effective and compliant with current legislation. The review process involves evaluation by the SLT of the policy's operation over the previous year, consultation with staff representatives to gather feedback on accessibility and effectiveness, and input from the Independent HR Consultant on best practice and legal compliance. Any significant incidents or learning points from the previous year inform policy updates.

The review also considers changes in legislation or regulatory guidance, particularly updates to KCSIE or ISI requirements. Benchmarking against other SEMH providers and educational institutions ensures our policy remains comprehensive and appropriate to our context. Student voice, while maintaining appropriate boundaries, may inform understanding of whether concerning practices are being identified and addressed.

Effectiveness Monitoring

The effectiveness of this policy is monitored through multiple indicators including the number and nature of concerns raised, suggesting whether staff feel able to report issues. The proportion of concerns resolved internally versus requiring external escalation indicates the effectiveness of internal procedures. Feedback from whistleblowers about their experience of the process helps identify areas for improvement. Any identified patterns in concerns suggest systemic issues requiring organisational response.

Exit interview data is analyzed to identify whether staff who leave have unreported concerns or felt unable to raise issues while employed. Staff survey results on psychological safety and willingness to raise concerns provide broader cultural indicators. The absence of concerns raised does not necessarily indicate an absence of problems and may suggest barriers to reporting that need addressing.

Integration with Other Policies

This whistleblowing policy operates alongside and complements other key policies including the Safeguarding and Child Protection Policy for immediate concerns about student welfare, the Grievance Procedure for individual employment disputes, the Disciplinary Policy which may be triggered by substantiated whistleblowing concerns, and the Code of Conduct which sets expected standards that whistleblowing may highlight breaches of.

Regular cross-referencing ensures consistency between policies and that staff understand which procedure to use in different circumstances. Where policies overlap, the paramount concern of student safety and wellbeing takes precedence in determining the appropriate response. Training addresses these interfaces to ensure staff can navigate between different reporting requirements effectively.