Vernham Dean Gillum's C of E Primary School

Whistleblowing Policy & Procedure

(Statutory Safeguarding & Public Interest Disclosure Policy)

Policy Date: September 2026	**Review Date: September 2027**
Status: Statutory Policy	**Target Audience: All Staff, Volunteers & Contractors**

Statutory Framework & Linked Policies

This policy operates in accordance with the Public Interest Disclosure Act 1998 (PIDA), DfE statutory guidance Keeping Children Safe in Education (KCSIE 2026), Working Together to Safeguard Children, and Hampshire County Council personnel procedures. This policy forms an integral part of the Staff Code of Conduct and should be read alongside the Child Protection & Safeguarding Policy.

1. Definition and Scope

Whistleblowing is a term used when staff need to report a serious concern about malpractice, illegal acts, or wrongdoing within the organisation that is in the public interest. This includes situations where standard reporting lines are unsuitable or where the concern involves a senior leader or governor.

This policy protects individuals who make reasonable disclosures regarding:

- Conduct which is a criminal offence or a breach of the law;
- Physical, sexual, emotional abuse, or neglect of pupils or others;
- Failure to comply with safeguarding procedures or ignoring harm to children;
- Major health and safety risks to staff, pupils, or members of the public;
- Financial fraud, corruption, bribery, or severe mismanagement;
- Miscarriages of justice or deliberate environmental damage;
- Deliberate concealment of any of the above.

2. Scope & Applicability

In accordance with statutory provisions, this policy applies to all personnel at Vernham Dean Gillum's C of E Primary School, including:

- Permanent and fixed-term teaching and support staff;
- Agency staff, supply teachers, and external contractors;
- Volunteers, Governors, student placements, and apprentices.

Note: This policy does not replace individual or collective grievance procedures, which exist for employees to raise personal workplace disputes. Issues of personal employment terms are excluded from this policy.

3. Safeguarding & Safeguarding Malpractice

At Vernham Dean Gillum's C of E Primary School, the Executive Headteacher is responsible for overall staff management and institutional leadership. If you are concerned that any member of staff, volunteer, or contractor is placing children at risk, failing to follow safeguarding processes, or behaving inappropriately (including low-level concerns that do not meet the harm threshold), you must **immediately report your concern to the Designated Safeguarding Lead (DSL) or the Executive Headteacher**.

If the concern involves the Headteacher, it must be reported directly to the **Chair of Governors**.

> **Key Safeguarding Leadership Contacts:**
> • Designated Safeguarding Lead (DSL): Mrs Holly Bulpitt
> • Chair of Governors: Contact via School Office (Confidential Header)
> • Hampshire Local Authority Designated Officer (LADO): 01962 876364 / child.protection@hants.gov.uk

4. Whistleblower Protections & Legal Guarantees

- **Protection from Victimisation**: Employees who make a protected disclosure in reasonable belief and good faith are legally protected from dismissal, disciplinary action, harassment, or any form of victimisation.
- **Confidentiality & Anonymity**: Disclosures will be handled with strict confidentiality. While anonymous disclosures are accepted and will be thoroughly investigated where reasonable evidence exists, staff are encouraged to provide their names to facilitate full investigation.
- **Untrue Allegations**: If an allegation is raised in good faith but is not confirmed by investigation, no action will be taken against the staff member. Disciplinary action may only be considered if an allegation is proven to be made maliciously or frivolously.
- **Right to Representation**: Staff are entitled to be accompanied by a Trade Union / Professional Association representative or a workplace colleague ('friend') during any whistleblowing interviews or meetings.

5. How to Raise a Concern

Step 1: Internal Reporting

Concerns should ideally be submitted in writing, detailing dates, individuals involved, and specific evidence where available.

- **Initial Contact**: Raise the concern directly with the Head of School.
- **Escalation Contact**: If the concern involves the Head of School, report directly to the Executive Headteacher. If it involves the Executive Headteacher, report directly to the Chair of Governors.

Step 2: Management Response & Timeline

- **Within 10 Working Days**: The Headteacher or Chair of Governors receiving the concern will write to acknowledge receipt, detail initial steps, and provide a named contact point.
- **Investigation & Feedback**: An impartial investigation will take place. The whistleblower will receive updates every 2 weeks and a target resolution window within 6 weeks where possible.

6. Management Investigation Steps

The Headteacher or Chair of Governors will:

- **Acknowledge & Document**: Actively listen in a confidential space and log precise written notes.
- **Assess & Escalate**: Determine seriousness, check credibility, and engage Education Personnel Services (EPS), the Local Authority Designated Officer (LADO), or Police as required by law.
- **Investigate Fairly**: Gather evidence, conduct interviews, and protect identities.
- **Remediate & Support**: Take corrective action to fix structural issues, communicate appropriate outcomes, and ensure ongoing protection against retaliation.

7. External Escalation & Prescribed Bodies

If internal processes are exhausted, or if staff feel unable to raise concerns internally due to serious malpractice concerns, external disclosures can be made without breaching confidentiality, provided they are made to an appropriate prescribed body:

Local Authority Escalation Steps

- Hampshire Local Authority Designated Officer (LADO)
- Local Authority Area Director
- Director of Children's Services
- Chief Executive of Hampshire County Council

Independent External Prescribed Bodies

- NSPCC Dedicated Whistleblowing Helpline: 0800 028 0285 / help@nspcc.org.uk
- Protect (Independent Whistleblowing Charity): 020 7404 6609 / protect-advice.org.uk
- Diocesan Director of Education
- Ofsted / DfE Inspectorate
- Hampshire Policy
- Citizens Advice Bureau or Legal Adviser

8. Unjustified External Disclosures

Staff must not make wider public disclosures (such as to media outlets or social networks) without first exhausting internal pathways or contacting prescribed regulatory bodies. Unreasonably publicising unverified allegations without justification may result in disciplinary review.