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Marshfield CE VC Primary School

Whistleblowing Policy & Procedures

Framework for Protected Disclosures, Safeguarding Escalation, Public Interest Reporting, and Prevention of Malpractice

1. Document Control & School Adoption Annex

This policy embodies the South Gloucestershire Council Model Whistleblowing Policy, fully adapted and ratified by the Governing Body of Marshfield Primary School. It aligns directly with Keeping Children Safe in Education (KCSIE 2026), Working Together to Safeguard Children 2026, the Public Interest Disclosure Act 1998 (PIDA), and the Marshfield Primary School Safeguarding and Child Protection Policy 2026.

Policy Attribute	School Details	Key Responsible Lead	Review Schedule
School Name & Location	Marshfield Primary School	Jessica Bolt (Headteacher & DSL)	Annual Review Cycle
Governing Body Ratification	Ratified September 2026	Hugh Campbell (Chair of Govs)	Next Review: Sept 2027
Safeguarding Governance	Annual S175 Audit Aligned	Emma Bradley (Safeguarding Gov)	Aligned with KCSIE 2026
Local Authority Oversight	South Gloucestershire Council	LADO Service	Two-Year Statutory Base

2. Policy Statement & Core Principles

2.1 Marshfield Primary School is committed to conducting its educational operations with the highest standards of integrity, openness, probity, and accountability. The Governing Body and Senior Leadership Team operate an uncompromising 'it can happen here' safeguarding ethos. Staff, volunteers, and associated workers are expected to raise serious concerns regarding any aspect of school work, operational practice, child welfare, or professional conduct that affects the integrity of the school, the safety of pupils, or the public interest.

2.2 Protection Against Victimisation (PIDA 1998): The school recognizes that 'blowing the whistle' can feel daunting. This policy guarantees full protection under the Public Interest Disclosure Act 1998 (PIDA) and the Employment Rights Act 1996. Any worker who discloses a qualifying concern in the reasonable belief that it is in the public interest will not suffer any detriment, harassment, victimisation, or disciplinary action as a result of making a disclosure. Any act of victimisation or retaliation against a whistleblower will be treated as a severe disciplinary offence.

2.3 Public Interest Requirement: Disclosures are protected under this policy if the whistleblower reasonably believes the disclosure is made in the public interest—meaning it touches upon matters affecting the rights, health, safety, welfare, or proper governance of pupils, staff, or the wider school community.

> **STATUTORY SAFEGUARDING & WHISTLEBLOWING MANDATE (KCSIE 2026)**
> Fears about data protection, professional loyalty, or personal detriment must NEVER stand in the way of raising serious safeguarding or malpractice concerns. If staff feel unable to raise concerns internally, or feel that an internal disclosure regarding child safety has been ignored, they must escalate externally to the NSPCC Whistleblowing Advice Line (0800 028 0285 / help@nspcc.org.uk) or Ofsted.

3. Scope & Application

This policy applies universally across Marshfield Primary School and encompasses all individuals working within or alongside the school environment, including:

- All permanent and fixed-term teaching and support staff employed by the school or council.
- Supply teachers, cover supervisors, trainee teachers, and student placements.
- Volunteers, governors, trustees, and unpaid helpers across all school activities.
- Agency workers, external consultants, freelance specialists, and sports coaches.
- Contractors, site operatives, catering/cleaning personnel, and service delivery partners.
- External organisations and hirers utilising school premises or facilities.

4. What Can Be Raised as Whistleblowing

A protected whistleblowing disclosure applies when a worker reasonably believes that one or more of the following forms of serious malpractice or wrongdoing is occurring, has occurred, or is likely to occur:

- **Safeguarding & Child Protection Failures:** Systemic failure to act on child protection referrals, cover-up of child abuse, ignoring filtering and monitoring breaches, or suppressing low-level concerns.
- **Criminal Offences:** Fraud, theft, bribery, financial corruption, false HMRC returns, or misappropriation of public funds.
- **Health & Safety Risks:** Deliberate use of unsafe equipment, failure to maintain site security, unsafe building practices, or placing pupils/staff in direct danger.
- **Physical, Sexual, or Emotional Abuse:** Maltreatment or abusive conduct directed towards pupils, service users, or vulnerable individuals.
- **Breach of Legal Obligations:** Failure to comply with statutory guidance (e.g. KCSIE 2026, EYFS Framework), employment law, or data protection statutes.
- **Environmental Damage:** Concealment of hazardous spills, asbestos disturbance, or unlawful waste disposal.
- **Concealment of Wrongdoing:** Deliberately hiding, destroying, or altering evidence relating to any of the above.

Matters Excluded from Whistleblowing

This policy is not a substitute for other established HR or operational procedures and does not apply to:

- **Personal Grievances:** Concerns regarding individual terms and conditions of employment, personal relationships, or individual interpersonal conflict must be raised under the Staff Grievance Policy.
- **Personal Bullying & Harassment:** Direct personal grievances regarding workplace treatment (where there is no broader public interest element) follow the Dignity at Work / Anti-Bullying Policy.
- **Minor Financial Discrepancies:** Routine bookkeeping errors or minor expense queries (without fraudulent intent) should be directed to the School Business Manager or Internal Audit (`auditfraud@southglos.gov.uk`).

5. Operational Routing: Staff Allegations vs. Whistleblowing

To ensure absolute compliance with Part 4 of KCSIE 2026 and Section 2.7 of the Marshfield Primary Safeguarding Policy, staff must distinguish clearly between reporting an individual allegation against an adult and blowing the whistle on a failure of safeguarding practice.

Category of Concern	Reporting Procedure & Key Lead	Statutory Escalation & LADO Route
Allegation Against Staff Member / Volunteer / Contractor (Individual Conduct)	Report IMMEDIATELY to Headteacher Jessica Bolt. (Do NOT speak to the individual or investigate).	Headteacher contacts Local Authority Designated Officer (LADO) within ONE working day (`lado@southglos.gov.uk`).
Allegation Concerning the Headteacher (Leadership Conduct)	Report IMMEDIATELY to Chair of Governors Hugh Campbell.	Chair of Governors contacts LADO within ONE working day. Staff may contact LADO directly if conflict exists.
Safeguarding Practice Failure or Cover-Up (Whistleblowing on Systemic Malpractice)	Report under Whistleblowing Policy to Headteacher, Chair of Govs, or Council Head of HR.	If unresolved or unsafe internally, contact NSPCC Whistleblowing Advice Line (0800 028 0285 / `help@nspcc.org.uk`) or Ofsted.

6. Reporting Procedure: Internal & External Pathways

6.1 Internal Reporting Channels

Concerns should normally be raised internally in the first instance. Whistleblowers should explicitly state that they are making a protected disclosure under the Whistleblowing Policy:

- **First Contact:** Raise the concern with Headteacher Jessica Bolt (`Jess.bolt@marshfieldprimary.org.uk`).
- **Alternative Internal Contact:** If the concern relates to the Headteacher or Senior Leadership Team, report directly to Chair of Governors Hugh Campbell.
- **Council Officers:** Staff may also contact the Monitoring Officer / Head of Legal Services or the Director of Children, Adults and Health (CAH).
- **Trade Union Support:** The whistleblower has the right to be accompanied by a trade union representative or workplace colleague during any meeting or interview.

6.2 Mandatory Safeguarding External Advice Lines

Where a member of staff feels unable to raise a safeguarding concern internally, or has genuine cause for concern that child protection failures are being ignored or covered up, they must utilise external channels:

- **NSPCC Whistleblowing Advice Line:** Dedicated national helpline for educational and childcare staff facing internal child protection barriers.
  - Phone: 0800 028 0285 (Available Monday to Friday, 8:00 AM – 8:00 PM)
  - Email: help@nspcc.org.uk
- **Protect (Independent Whistleblowing Charity):** Free, confidential legal advice on public interest disclosures.
  - Phone: 020 3117 2520
  - Email: whistle@protect-advice.org.uk | Website: protect-advice.org.uk
- **GOV.UK Whistleblowing Guidance:** Official UK Government guidance on prescribed bodies: https://www.gov.uk/whistleblowing.

6.3 Anonymous Disclosures

Whistleblowers are strongly encouraged to put their name to allegations to facilitate proper investigation and feedback. Anonymous disclosures will be investigated, but are inherently more difficult to act upon. Factors considered when evaluating anonymous reports include the seriousness of the issue, credibility, and likelihood of confirming the allegation through independent evidence.

7. Investigation Process & Response Timelines

- **Registration (Immediate):** All whistleblowing disclosures must be registered immediately by the Headteacher / Manager with the Council's Head of HR. Cases involving financial fraud are logged with the Audit Manager.
- **Formal Acknowledgment (Within 10 Working Days):** The Head of HR or Chair of Governors will write to the whistleblower within 10 working days acknowledging receipt, summarizing the concern, and explaining next steps.
- **Scoping & Investigation Strategy:** Depending on the nature of the allegation, the matter will be assigned to: (a) Internal departmental investigation, (b) Independent external investigator, (c) Internal Audit / External Auditor, or (d) Statutory referral to Police / LADO / Regulatory Agencies.
- **Progress Update (Within 20 Working Days):** Within 20 working days of the initial disclosure, the investigating officer will provide a formal written update on progress, planned inquiries, and estimated completion timelines.

8. Support, Feedback & Outcome Notification

8.1 Designated Contact Officer: A named contact officer will be assigned to support the whistleblower throughout the investigation, addressing safety concerns and providing regular updates.

8.2 Outcome Notification: Subject to legal constraints and data privacy requirements, the whistleblower will be informed of the outcome of the investigation (e.g. whether allegations were substantiated and systemic remedies enacted).

8.3 Appeals & Escalation: If the whistleblower is dissatisfied with the internal outcome or handling of the investigation, they have the right to write directly to the Council's Chief Executive or contact external prescribed bodies.

9. External Prescribed Bodies

Where internal procedures have been exhausted, or where a worker reasonably believes that an internal disclosure would lead to evidence destruction or personal detriment, external disclosures may be made to:

- **Ofsted:** Enquiries, disclosures, and safeguarding escalation (`whistleblowing@ofsted.gov.uk` / 0300 123 3155)
- **NSPCC Whistleblowing Helpline:** Child protection failures and practice escalation (0800 028 0285 / `help@nspcc.org.uk`)
- **Health & Safety Executive (HSE):** Workplace safety risks and dangerous premises conditions
- **Care Quality Commission (CQC):** Health and social care provision concerns
- **Environment Agency:** Environmental risk or hazardous contamination
- **External Auditor / Audit Commission:** Financial corruption and public funding irregularities

10. Malicious Disclosures & Protection Protections

If an allegation is made in good faith, but is not substantiated by investigation, no action will be taken against the whistleblower. However, if an individual makes an allegation maliciously, frivolously, or for personal gain, disciplinary action may be taken under the Staff Code of Conduct.

11. Summary of Roles & Responsibilities

Role / Responsible Party	Core Whistleblowing Duties
Headteacher & DSL (Jessica Bolt)	Promotes open culture; registers disclosures immediately with Head of HR; manages LADO staff allegations; ensures annual training on whistleblowing and NSPCC helpline.
Chair of Governors (Hugh Campbell)	Receives disclosures regarding Headteacher; liaises with LADO and Head of HR; oversees governor investigations and ensures annual policy review.
Council Head of HR & LADO Service	Maintains central whistleblowing register; acknowledges disclosures within 10 days; agrees terms of reference; oversees LADO allegations within 1 working day.
All Staff, Volunteers & Contractors	Maintains vigilance; reports serious malpractice or safeguarding practice failures promptly; utilises internal or external escalation routes (NSPCC helpline) in good faith.