Belmont Community Primary School

Whistleblowing Policy

2026/27

Approved by: Governing Body
Approval date: 6 October 2026
Review date: 1 October 2027
This policy replaces the October 2023 Whistleblowing Policy.

Introduction

The Governing Body of Belmont Community Primary School is committed to achieving the highest possible standards of service and the highest possible standards in public life within a culture of openness and accountability. Accordingly, this Governing Body encourages members of staff to use the procedure outlined in this policy in order to raise concerns of internal malpractice, illegal acts or omissions without fear of harassment or victimisation.

The Governing Body is aware that, more often than not, it is members of staff who first become aware of areas of potential malpractice in relation to the way in which the Governing Body carries out its business. This policy sets out the way in which such concerns can, and should, be raised by members of staff without fear of reprisal.

The Aim of this Policy

This policy aims to:

- Provide an avenue for members of staff to raise concerns and receive feedback (where appropriate) on any action taken.
- Allow members of staff to take matters further if they are dissatisfied with the Governing Body's response.
- Reassure members of staff that they will be protected from reprisals or victimisation for 'whistleblowing' in accordance with this policy and the law.

The Objectives of this Policy

- Demonstrates that Belmont Community Primary School is committed to ensuring its affairs are carried out ethically, honestly, and to high standards.
- Is good employment practice.
- Shows that the school has introduced a procedure to protect public safety and public money.
- Will help develop a culture of openness, accountability and integrity.
- Will encourage staff to raise matters internally, making wider disclosures less likely.

- Will contribute to the efficient running of the school and the delivery of services.
- Will help curb corruption, fraud and mismanagement.
- Will help uphold the reputation of the school and maintain public confidence.

The Scope of this Policy

The expression 'whistleblowing' is commonly used to describe circumstances where a worker makes a protected disclosure of a kind referred to within Part IVA of the Employment Rights Act 1996 (as inserted by the Public Interest Disclosure Act 1998 and amended by the Enterprise and Regulatory Reform Act 2013) (together, 'the law'). The law affords protection to workers who report acts or omissions which could be described as falling within the following definitions:

- A criminal offence.
- Breach of a legal obligation.
- A miscarriage of justice.
- A danger to the health and safety of any individual.
- Damage to the environment.
- Deliberate concealment of information tending to show any of the above five matters.

In the event that a member of staff has concerns that something of this nature has occurred at work then the member of staff should disclose all relevant information in accordance with the reporting mechanisms described later in this policy.

The Governing Body has a range of policies and procedures which deal with standards of behaviour at work; these cover Discipline, Grievance, Capability, Harassment, Allegations of Abuse Against Staff, and Recruitment and Selection. Members of staff are encouraged to use the provisions of these procedures when appropriate.

There may be times, however, when the matter needs to be handled in a different way. This policy is intended to cover concerns that fall outside the scope of other procedures, for example:

- Malpractice or ill treatment of a pupil by a member of staff.
- Where a criminal offence has been committed, is being committed or is likely to be committed.
- Suspected fraud.
- Disregard for legislation, particularly in relation to health and safety at work.
- Breach of standing financial instructions.
- Improper conduct in matters related to appointment.
- A breach of a Code of Conduct; and/or information on any of the above which has been, or is likely to be, concealed.

In the event that a member of staff has concerns that something of this nature has occurred at work then they should disclose all relevant information in accordance with the reporting mechanisms described later in this policy.

A disclosure will only be a 'qualifying disclosure' protected by law where the worker reasonably believes that it tends to show one of the matters listed above and that making the disclosure is

in the public interest. Unlike the position before June 2013, a disclosure does not need to be made in good faith in order to qualify for legal protection; however, if a disclosure is not made in good faith, an employment tribunal may reduce any compensation awarded by up to 25%. A worker who makes a false disclosure that they do not reasonably believe to be true, or who makes a disclosure maliciously or for personal gain, is not protected and may be subject to disciplinary action.

Provided that the disclosure is a qualifying disclosure made in accordance with the law and, where appropriate, disclosed to the correct recipient, the worker will be legally protected from suffering any detriment, and protected from dismissal, in relation to their employment as a result of having made that disclosure.

Confidentiality

The Governing Body will do its best to protect the identity of a member of staff who decides to make a disclosure in accordance with this policy and who does not want their name to be revealed. However, if a consequent investigation is initiated, it may be necessary to reveal the source of the complaint, and the Whistleblower may be asked to provide a relevant statement.

Designated Officer

The Governing Body has appointed a Designated Officer to be the point of contact for concerns raised under the Whistleblowing Procedure. The Designated Officer should be impartial and capable of taking an independent view on the concern raised.

Designated Officer	Emily Blackburn
Head Teacher	Jamie Allsopp
Chair of Governors	Simon Buckberry

Anonymous Allegations

The Governing Body encourages those making a disclosure to put their name to their allegation. Concerns expressed anonymously are much less powerful but they may be considered at the discretion of the Designated Officer. In exercising this discretion, the factors to be taken into account may include:

- The seriousness of the issues raised.
- The credibility of the concern.
- The likelihood of confirming the allegation from attributable sources.

Allegations which do not appear to be motivated by personal animosity and which, if true, would have serious implications for the Governing Body, are more likely to be considered, despite the fact that they have been made anonymously.

Untrue Allegations

If a member of staff makes an allegation which is made in good faith, but is not confirmed by the investigation, no action shall be taken against the Whistleblower. If, however, the allegation is considered to have been made maliciously, vexatiously, or without any reasonable belief in its truth, disciplinary action may be taken.

How to Raise a Concern

First Step

- A member of staff with a concern should usually raise this with his/her immediate line manager first. The manager would then refer the matter to the Designated Officer.
- If the line manager is involved, the member of staff should raise the concerns with the Designated Officer.
- If the Designated Officer is involved, the line manager should raise the concerns with the Headteacher.
- If the Headteacher is involved, the Designated Officer should raise the concerns with the Chair of Governors.
- If the Chair of Governors is involved, the Designated Officer should raise the concerns with the Director of Children's Services.

Confirmation of Concerns

- Concerns should be confirmed in writing, setting out the background and history of the concern, giving names, dates and places where possible, and the reason for concern.
- Members of staff who do not initially feel able to put their concerns in writing should meet the Designated Officer.

Advice and guidance on how matters of concern may be pursued can be obtained from:

Lincolnshire County Council Whistleblowing Line	0800 085 3716
Email	whistleblowing@lincolnshire.gov.uk
Write to	Lincolnshire County Council, P.O. Box 640, Lincoln, LN1 1WF

Concerns specifically relating to how an allegation of abuse involving a child has been, or is being, handled by the school — including where the concern relates to the conduct of a senior leader — may also be raised with the NSPCC Whistleblowing Advice Line:

NSPCC Whistleblowing Advice Line	0800 028 0285
Email	help@nspcc.org.uk

Staff can also seek advice from their trade union or professional association, who may wish to raise a matter on behalf of the member of staff.

Trade union or professional association representatives will themselves have the protection given to complainants under this procedure, provided that they act in accordance with the procedure with regard to the information so disclosed.

The Governing Body's Initial Response

- The Designated Officer or line manager, if requested, will arrange an initial interview. At this stage, the Whistleblower will be reassured that he/she will be protected from possible victimisation, and will be asked if he/she wants to make a written or verbal statement. In either case, the Designated Officer or line manager will then write a brief summary of the interview, which will be agreed by both parties.

- As far as possible, the confidentiality of the Whistleblower will be protected; however, this cannot be guaranteed.
- The Designated Officer or line manager will report to the Headteacher (or Chair of Governors), who may set up any further necessary investigations. This may include an external investigation.

The Investigation

In order to protect individuals and the Governing Body, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures (for example, child protection or discrimination issues) will normally be referred for consideration under those procedures. It may be necessary for an investigation to take place in strict confidence (with the person under investigation not being informed until necessary). If it is necessary to suspend a member of staff while the investigation takes place, the procedure in the Disciplinary Policy will be used. Some concerns may be resolved by agreed action without the need for investigation; others may have to be referred to the Police, an external auditor or form the subject of an independent inquiry.

The Governing Body recognises the contribution that trade unions can make to any inquiry and agrees to consult, where appropriate, with the recognised trade union(s) about the issues, such as the scope of any inquiry and the implementation of the recommendations of the inquiry.

The Designated Officer will endeavour to:

- Confirm receipt in writing (within five working days) of a concern being received, acknowledging that the concern has been received.
- Write (within ten working days) indicating how he/she proposes to deal with the matter, where possible giving an estimate of how long it will take to provide a response, detailing whether any initial enquiries have been made, and whether further investigations will take place, and if not, why not.

The matters raised may:

- Be disposed of without further action.
- Be investigated internally.
- Be referred to the Police.
- Be referred to an external auditor.
- Form the subject of an independent inquiry.

How the Governing Body Will Respond

Following the investigation, the Designated Officer will (subject to legal constraints) inform both the Headteacher (or Chair of Governors) and the Whistleblower of the result of the investigation. (This will not include details of any disciplinary action, which will remain confidential to the individual concerned.)

If the investigation shows there is a case to be answered, the Disciplinary or Capability Procedure may be used.

If there is no case to answer, the Designated Officer or line manager will inform the Headteacher (or Chair of Governors) of this fact.

Disciplinary action may be taken against the Whistleblower where a false allegation is made maliciously or without any reasonable belief in its truth.

Records

A note of the concern raised, how it was resolved, and copies of any records associated with the investigation will be stored confidentially for at least 12 months following resolution, in accordance with the school's data protection and retention arrangements.

Further Recourse

This policy is intended to provide members of staff with a way in which to raise concerns within the Governing Body. If the Whistleblower is not satisfied with the outcome of the investigation, the Whistleblower may make a disclosure to a body prescribed by law for this purpose, notwithstanding the result of the school's own investigation. Current prescribed persons and bodies relevant to a school setting include:

- Ofsted.
- The Health and Safety Executive (HSE).
- HM Revenue & Customs (HMRC).
- The Environment Agency.
- The Serious Fraud Office.
- The Certification Officer (for trade union matters).
- The Charity Commission.
- The Information Commissioner's Office (ICO).
- The local authority (Lincolnshire County Council).
- Protect (formerly Public Concern at Work), the independent whistleblowing charity.

The full, current list of prescribed persons and bodies, and the matters each covers, is set out in the Public Interest Disclosure (Prescribed Persons) Order and published by the Department for Business and Trade; staff should check this before making an external disclosure to ensure they are contacting a body prescribed for the relevant type of concern.

If the Whistleblower chooses to take the matter outside the school, the Whistleblower will need to ensure that they do not disclose confidential information beyond what is necessary and permitted by law; in this regard the Whistleblower should first check with the Designated Officer.

Responsible Officer

The Designated Officer has overall responsibility for the maintenance and operation of this policy. The Designated Officer will maintain a record of concerns raised, and the outcomes (in a way which does not endanger confidentiality), and shall report as necessary to the Governing Body.

The Law

This policy and procedure has been written to take account of Part IVA of the Employment Rights Act 1996, which protects workers who make a qualifying disclosure about certain matters of concern, made in accordance with its provisions. Part IVA was inserted into the Employment Rights Act 1996 by the Public Interest Disclosure Act 1998 and was amended by the Enterprise and Regulatory Reform Act 2013, which introduced the requirement that a qualifying disclosure must be made in the reasonable belief that it is in the public interest.

Policy approval and review record

Approved by the Governing Body	7 October 2026
Signed	
Review date	1 October 2027