

Whistleblowing Policy

To Include Early Years Foundation Stage (EYFS)

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Table of Contents

Aim of policy:	1
Related Guidance and School Policies	2
Scope.....	3
Commitment to Openness and Integrity.....	3
What Is Whistleblowing?	3
Safeguarding and Child Protection.....	4
Concerns That May Be Raised Under This Policy	4
Raising a Concern	4
Internal Reporting Procedures	4
Anonymous Disclosures	5
Investigation of Concerns	5
Protection of Whistleblowers	5
Malicious or False Allegations	6
External Reporting	6
Modern Slavery	6
Confidentiality and Data Protection	7
Training and Awareness	7
Record Keeping	7
Monitoring and Review.....	7

Aim of policy:

The aim of this Whistleblowing Policy is to promote a culture of openness, honesty, integrity and accountability across **Park School**. The School believes that concerns about wrongdoing, malpractice or unsafe practice should be raised at the earliest possible opportunity so that appropriate action can be taken before harm occurs. Effective whistleblowing arrangements form an important part of safeguarding, governance, regulatory compliance and organisational improvement.

Park School is committed to ensuring that any individual who raises a genuine concern in the public interest can do so confidently and without fear of retaliation. The School recognises that speaking up may be difficult and is committed to creating an environment in which concerns are welcomed, taken seriously and investigated appropriately.

Related Guidance and School Policies

This policy outlines the schools approach to whistleblowing but is not exhaustive in its scope and should be used in conjunction with the following policies, statutory guidance and advice:

Policies:

- *Safeguarding and Child Protection Policy*
- *Filtering & Monitoring Policy*
- *Artificial Intelligence Policy*
- *Behaviour & Sanction Policy*
- *Anti-Bullying Policy*
- *Early Years Framework*
- *Health & Safety Policy*
- *Controlled Medicines Policy*
- *Complaints & Concerns Policy*
- *Drug, Alcohol & Tobacco Misuse Policy*
- *Low Level Concerns Policy*
- *Prevent(Extremism & Radicalisation) Policy*
- *Safer Recruitment Policy*
- *SEND Policy*
- *Staff Digital Acceptable Use Policy*
- *Visitors, Contractors & Site Security Policy*

Statutory & Regulatory Guidance:

- Employment Rights Act 1996
- Public Interest Disclosure Act 1998
- Enterprise and Regulatory Reform Act 2013
- Children Act 2004
- The Education (Independent School Standards) Regulations 2014
- The Independent School Standards: Guidance for Independent Schools — April 2026
- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- Guidance for Safer Working Practice for Adults Working with Children and Young People in Education Settings — February 2022
- Whistleblowing for Employees — Department for Business and Trade
- Safeguarding Vulnerable Groups Act 2006 — duty to refer to the DBS
- NSPCC Whistleblowing Advice Line (0800 028 0285) — KCSIE expects this to be signposted to staff

Scope

This policy applies to all individuals working for or on behalf of **Park School**, including employees, governors, volunteers, agency workers, contractors, consultants, peripatetic staff, visiting professionals and any other adult undertaking work or services under the School's direction.

The policy applies where concerns relate to matters affecting the wider public interest rather than individual employment grievances. It is therefore distinct from the School's Grievance Procedure, which exists to address personal employment matters. However, where an employment concern raises issues of safeguarding, illegality, regulatory non-compliance, serious misconduct or wider risk, it may fall within the scope of this policy.

Commitment to Openness and Integrity

Park School is committed to conducting its activities with honesty, integrity and professional accountability. The School recognises that organisations are sometimes exposed to wrongdoing, poor practice, human error or failures in systems and procedures. In many cases these issues are identified first by individuals working within the organisation.

The School therefore values staff and others who raise concerns responsibly and recognises that whistleblowing is an important safeguard rather than an act of disloyalty. Raising concerns contributes to the protection of pupils, staff, visitors and the wider School community and helps maintain public confidence in the School's standards and values.

Individuals should never feel that they must remain silent about concerns that could place children, colleagues, visitors or the School at risk.

What Is Whistleblowing?

Whistleblowing is the disclosure of information relating to suspected wrongdoing, malpractice, unlawful activity or risk where the individual reasonably believes the disclosure to be in the public interest.

A protected disclosure may relate to criminal offences, breaches of legal obligations, failures in safeguarding practice, serious health and safety concerns, fraud, financial irregularity, bribery, corruption, environmental damage, regulatory breaches or the deliberate concealment of any such matters.

Whistleblowing may also involve concerns about the conduct of adults working with children, failures to follow safeguarding procedures, inappropriate relationships with pupils, serious failures in governance, unsafe staffing practices or failures to comply with the Independent School Standards.

The School recognises that wrongdoing may take many forms and encourages individuals to raise concerns even where they are uncertain whether the matter falls precisely within a particular category.

Safeguarding and Child Protection

Safeguarding concerns must always take precedence over all other considerations. Nothing within this policy prevents or delays any individual from fulfilling their safeguarding responsibilities under Keeping Children Safe in Education.

Where a concern relates to the welfare of a child, a risk of harm to a child, inappropriate behaviour by an adult towards a child, a failure to respond appropriately to safeguarding concerns or a culture of unsafe safeguarding practice, immediate action must be taken in accordance with the School's Safeguarding and Child Protection Policy.

Staff do not need evidence or proof before raising a safeguarding concern. A genuinely held belief or concern is sufficient. The threshold for reporting safeguarding concerns is deliberately low because the safety and welfare of children must always come first.

This policy should be read alongside the School's Safeguarding and Child Protection Policy and Low-Level Concerns Policy.

Concerns That May Be Raised Under This Policy

Whistleblowing concerns may include safeguarding failures, child protection concerns, inappropriate conduct by adults, serious health and safety risks, unlawful conduct, criminal offences, financial malpractice, fraud, bribery, corruption, breaches of statutory duties, risks to pupils or staff, regulatory non-compliance, serious misconduct or attempts to conceal any of these matters.

The examples contained within this policy are illustrative rather than exhaustive. Individuals should not delay reporting concerns because they are uncertain whether a matter falls precisely within one of the categories described.

Raising a Concern

The School encourages concerns to be raised as early as possible. Delays may increase risk and make investigations more difficult.

Concerns may be raised verbally or in writing and should, where possible, include details of the issue, the individuals involved, relevant dates, locations, witnesses and any supporting information available at the time. However, concerns should still be raised even if complete information is not available.

Whistleblowers are not expected to investigate matters themselves or establish proof of wrongdoing before reporting concerns.

Internal Reporting Procedures

Concerns should normally be raised initially with an individual's line manager. In many cases concerns can be resolved appropriately at this stage through investigation, clarification or corrective action.

Where a concern involves the line manager, or where the individual does not feel comfortable reporting to their line manager, the matter should be referred directly to the Headteacher or Designated Safeguarding Lead.

Where concerns involve the Headteacher, the matter should be reported directly to Christine Pouncett, without informing the Headteacher first.

The School will normally acknowledge receipt of a concern within seven working days and explain the next steps that will be taken.

If the whistleblower reasonably believes that the concern has not been addressed appropriately or no adequate response has been received, the concern may be escalated through the School's reporting structure until a suitable level of independent oversight is achieved.

Anonymous Disclosures

The School recognises that some individuals may feel unable to identify themselves when raising concerns. Anonymous disclosures will therefore be considered and assessed.

However, anonymity can make investigations more difficult, limit the ability to gather additional evidence and restrict the feedback that can be provided. For these reasons, individuals are encouraged to identify themselves wherever possible.

Where anonymity is requested, the School will nevertheless seek to investigate concerns appropriately and proportionately.

Investigation of Concerns

All whistleblowing concerns will be treated seriously and assessed on their merits. The nature and scale of any investigation will depend upon the circumstances of the disclosure and the issues raised.

Investigations may involve internal fact-finding, safeguarding enquiries, referrals to external agencies, regulatory notifications, disciplinary investigations or independent review. The School will determine the most appropriate course of action based upon the nature of the concern.

Throughout any investigation, confidentiality will be maintained as far as reasonably possible, subject to safeguarding, legal and procedural requirements.

Where appropriate and lawful, the individual raising the concern will be informed about progress and outcomes. However, there may be limitations upon the information that can be shared because of confidentiality, employment or data protection considerations.

Protection of Whistleblowers

Park School is committed to ensuring that no individual suffers disadvantage because they have raised a genuine concern in good faith.

Individuals who make protected disclosures in accordance with the Public Interest Disclosure Act 1998 are protected by law from dismissal, victimisation, harassment, disciplinary action, intimidation or other forms of detriment arising from the disclosure.

Any attempt to victimise, intimidate or disadvantage a whistleblower will be treated as a serious matter and may result in disciplinary action.

The School expects all managers and leaders to foster an environment in which concerns can be raised openly and constructively.

Malicious or False Allegations

The School recognises the difference between concerns raised in good faith and allegations made dishonestly or maliciously.

Individuals will not face action because a concern ultimately proves to be unfounded, provided that it was raised honestly and with a genuine belief that wrongdoing may have occurred.

However, deliberately false, malicious or vexatious allegations undermine trust, divert resources and may cause significant harm. Where it is established that an individual knowingly made a false allegation, disciplinary action may be taken.

External Reporting

The School encourages concerns to be raised internally wherever possible because this usually allows issues to be addressed quickly and effectively.

However, the law recognises circumstances in which individuals may need to report concerns externally. This may arise where internal reporting is inappropriate, where there are concerns about how a disclosure would be handled or where previous disclosures have not been addressed appropriately.

Depending on the nature of the concern, external bodies may include the Local Authority Designated Officer, Children's Social Care, the Police, the Department for Education, Ofsted, the Independent Schools Inspectorate, the Health and Safety Executive or other appropriate prescribed bodies.

Individuals may also seek independent advice through the NSPCC Whistleblowing Advice Line when concerns relate to safeguarding children.

The School recognises that lawful protected disclosures to prescribed bodies are expressly safeguarded by whistleblowing legislation.

Modern Slavery

The School is committed to preventing modern slavery, human trafficking and exploitation. Any concern relating to modern slavery should be raised immediately and may be reported through this policy.

Where there is reason to believe that a criminal offence involving modern slavery may have occurred, the Police should be contacted without delay. Individuals may also seek advice through the Modern Slavery Helpline.

Confidentiality and Data Protection

Whistleblowing concerns will be handled sensitively and confidentially wherever possible.

Information will be shared only with those who need to know in order to investigate concerns, fulfil safeguarding duties or comply with legal obligations.

However, there may be circumstances where confidentiality cannot be guaranteed, including where a child may be at risk of harm, criminal activity is suspected, legal proceedings require disclosure or regulatory obligations apply.

All records relating to whistleblowing concerns will be managed in accordance with data protection legislation and the School's records management procedures.

Training and Awareness

The School recognises that whistleblowing arrangements are only effective if individuals understand them. All staff will therefore be made aware of this policy through induction, safeguarding training and periodic refresher training.

Training will emphasise the importance of speaking up, understanding reporting routes, recognising safeguarding concerns and understanding the legal protections available to those who raise concerns appropriately.

Volunteers, contractors and other adults working on behalf of the School will also be informed of relevant reporting procedures where appropriate.

Record Keeping

The School will maintain secure and confidential records of whistleblowing disclosures, investigations, outcomes and actions taken. These records support good governance, safeguarding oversight and regulatory compliance.

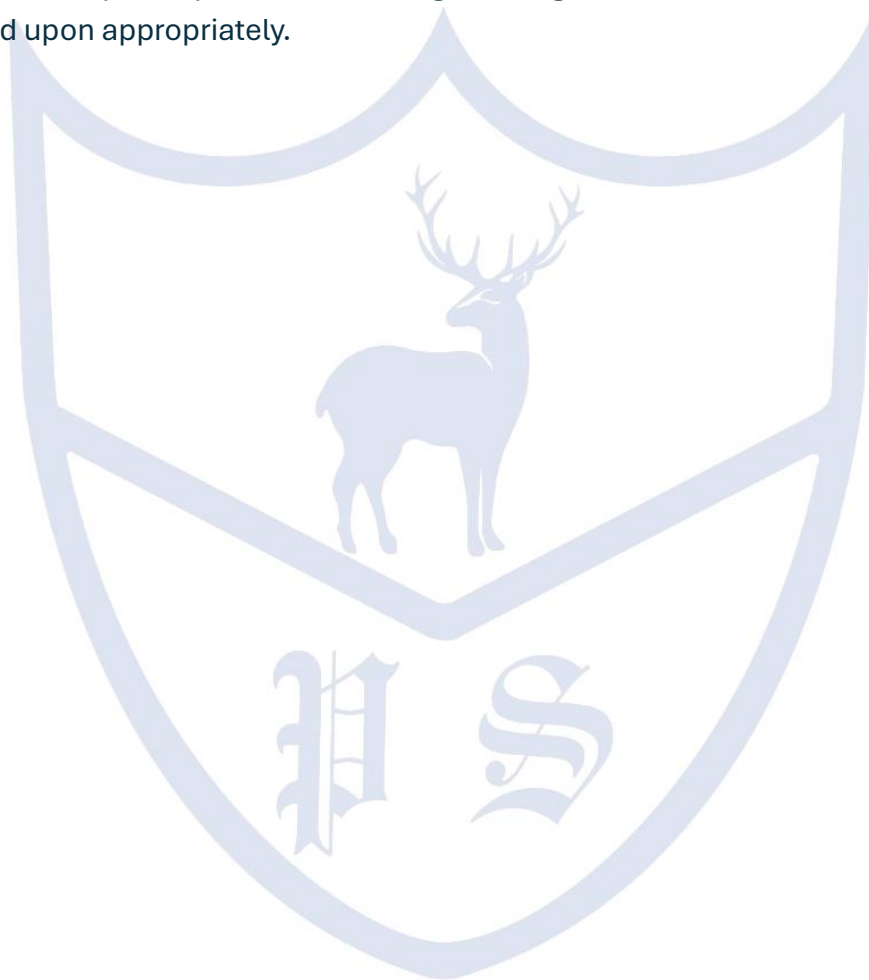
Records will be retained securely, access will be restricted to authorised personnel and any lessons arising from investigations will be used to improve policies, procedures and practice.

Monitoring and Review

The Governing Body and Senior Leadership Team will monitor the operation of this policy to ensure that whistleblowing concerns are handled effectively, fairly and in accordance with statutory requirements.

Monitoring may include review of the number and nature of concerns raised, timescales for response, themes emerging from disclosures and any actions taken to improve systems, safeguarding practice or organisational culture.

This policy will be reviewed annually and whenever changes in legislation, regulatory requirements, safeguarding guidance or inspection expectations require amendment. Through maintaining a culture of transparency, integrity and accountability, **Park School** seeks to ensure that every member of its community feels able to speak up when something is wrong and confident that concerns will be taken seriously and acted upon appropriately.



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