

HANDEL HOUSE SCHOOL
Northolme, Gainsborough, Lincs. DN21 2JB
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HANDEL HOUSE SCHOOL
SAFEGUARDING CHILDREN – WHISTLEBLOWING
POLICY AND PROCEDURES

This policy which applies to the whole school including the Early Years Foundation Stage (EYFS) is available on the school website and upon request from the school office.

Legal Status:

This policy should be read in conjunction with the current version of Keeping Children Safe in Education (KCSIE 2025), Working Together to Safeguard Children, and the Independent School Standards.

The key piece of whistleblowing legislation is the Public Interest Disclosure Act 1998 (PIDA) which applies to almost all workers and employees who ordinarily work in Great Britain. The situations covered include criminal offences, risks to health and safety, failure to comply with a legal obligation, a miscarriage of justice and environmental damage. Employees and workers who make a 'protected disclosure' are protected from being treated badly or being dismissed.

For a disclosure to be protected it must be made to an appropriate body. For example, disclosing a health and safety issue to the Health and Safety Executive is likely to be protected, but not if the concern was disclosed to the media.

Applies to:

- Whole school, inclusive of the Early Years Foundation Stage

To be read with:

- Safeguarding - Child Protection Policy
- Health, Safety and Welfare Policy
- Safeguarding – Safer Recruitment Policy and Procedures
- Anti-bullying Policy
- Behaviour, Discipline, and Sanctions Policy
- Equality and Diversity Policy and Implications
- Low-Level Concerns Policy
- Complaints Procedure

Available from:

- The School Office and website

Monitoring and Review:

This policy will be subject to continuous monitoring, refinement and audit annually by the Headteacher/Proprietor and the School Advisory Board to ensure compliance with current legislation, safeguarding requirements and best practice guidance, or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.

Signed:
Mr Mark Raisborough
Headteacher

Date: June 2026

This policy was last reviewed and agreed by the Headteacher/Proprietor of the school in June 2026 and ratified by the School's Advisory Board and will next be reviewed no later than August 2027 or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.

WHISTLEBLOWING POLICY

PREAMBLE

Whistleblowing is recognised as an important safeguard for children and for the integrity of the school. Handel House School is therefore committed to the highest possible standards of openness, probity and accountability. In line with that commitment employees and others with serious concerns about malpractice or wrongdoing in the School's work are encouraged to come forward and voice those concerns without fear of victimisation. Whatever the source, the Headteacher/Proprietor is committed to listening to the concerns, taking them seriously and ensuring that they are dealt with promptly and fairly.

Staff should normally raise concerns to the Headteacher/Proprietor. Where the concern relates to the Headteacher/Proprietor, concerns should be reported directly to the nominated School Advisory Board member - Mr Michael Betts (Contact details available upon request)

The Second Report of the Committee on Standards in Public Life: Local Public Spending Bodies published by The Nolan Committee used the term "whistleblowing" to mean the confidential raising of problems or concerns within an organisation by a member of staff. This is not "leaking" information but refers to matters of impropriety e.g. a breach of law, school procedures or ethics. Nor is whistleblowing the raising of a grievance within the school (which would be dealt with under the staff grievance procedures).

In accordance with the above report, the School's policy on whistleblowing is intended to demonstrate that Handel House School:

- Will not tolerate malpractice
- Respects the confidentiality of staff raising concerns and will provide procedures to maintain the confidentiality so far as is consistent with progressing the issues effectively
- Will provide the opportunity to raise concerns outside the normal line management structure where this is appropriate.
- Will provide a clear simple procedure for raising concerns that is accessible to all members of staff

Those external to Handel House School are encouraged to raise any concerns they have about the way in which the School operates through the School's Complaints Procedure. Employees are often the first to realise that there may be something seriously wrong with an organisation. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the organisation. They may also fear harassment or victimisation. Employees are encouraged to raise their concerns within Handel House School by applying the approach described in this document, rather than overlooking a problem or blowing the whistle outside the organisation.

Handel House School provides immunity from retribution or disciplinary action against such staff where the individual reasonably believes the information disclosed tends to show wrongdoing and that the disclosure is made in the public interest. At all levels, including newly appointed and ancillary, staff have been given briefing or training on responding to suspicions or allegations of abuse and know what action they should take in response to such suspicions or allegations.

The policy aims

The purpose of this policy is to:

- Promote a culture of openness, transparency and accountability
- Encourage early reporting of concerns
- Ensure concerns are investigated fairly, proportionately and without delay

INTRODUCTION

The staff and the Headteacher/Proprietor of Handel House School seek to run all aspects of school business and activity with full regard for high standards of conduct and integrity. If members of school staff, supply staff, parents, proprietors or the school community at large become aware of activities which give cause for concern, Handel House School has this whistleblowing policy; this acts as a framework to allow concerns to be raised confidentially and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion, under the school's disciplinary procedure.

Handel House School is committed to tackling fraud and other forms of malpractice and treats these issues seriously. Handel House School recognises that some concerns may be extremely sensitive and has therefore developed a system which allows for the confidential raising of concerns within the school environment but also has recourse to an external party outside the management structure of the school.

POLICY

The Headteacher/Proprietor and employees have a responsibility to carry out their duties to the highest standards of openness, probity and accountability and to come forward when they have serious concerns about malpractice or wrongdoing in the work of Handel House School. In accordance with Keeping Children Safe in Education, all staff should feel able to raise concerns about poor or unsafe safeguarding practice and potential failures within the School's safeguarding arrangements. Concerns about safeguarding should be raised immediately and maybe referred directly to external agencies where appropriate.

This policy aims to:

- Provide avenues for employees to raise concerns and receive feedback on any action taken;
- Allow employees to take the matter further if they are dissatisfied with Handel House School's response;
- Reassure employees that they will be protected from reprisals of victimisation for whistleblowing in good faith;
- There are existing procedures in place (e.g. grievance, harassment and bullying) which make provision for employees to lodge a concern relating to their own employment. This whistleblowing policy is intended to complement those procedures by covering concerns that appear to fall outside their scope. Individuals with serious concerns about malpractice or wrongdoing should contact the Headteacher/Proprietor. If the concern involves the Headteacher/Proprietor, or if the employee reasonably believes that the matter cannot be raised with the Headteacher/Proprietor, the concern should instead be raised with a member of the School Advisory Board, who will ensure that appropriate action is taken and that any investigation is conducted impartially.

Concerns about malpractice or wrongdoing may include:

- any unlawful act, whether criminal or a breach of civil law, including corruption or fraud;
- breach or failure to comply with the School's standing orders or policies;
- breach or failure to comply with established standards or practice, including statutory codes or practice and standards promoted by professional bodies;
- any form of improper conduct;
- actions likely to cause physical danger to any person or to give rise to a risk of significant damage to property;
- failure to take reasonable steps to report and rectify any situation which is likely to give rise to a significant, avoidable cost or loss of income to the School or would seriously prejudice the Proprietor or the School;
- manipulation of accounting records and finances;
- inappropriate use of school assets or funds;
- decision-making for personal gain;
- any criminal activity;
- damage to the environment of the school;
- dangerous practices;
- abuse of position;
- serious breaches of school procedures which may advantage a particular party (for example tampering with tender documentation, failure to register a personal interest);

- sexual or physical abuse of pupils or others whether physical or verbal;
- other unethical conduct;
- indecent or violent behaviour towards any person;
- harassment or bullying of a pupil or member of staff;
- serious neglect of duties (including unauthorised absence from work);
- serious breach of the School's policies and procedures;
- any act which might give rise to a serious complaint against the School by any pupil, parent, employee, supplier, contractor or visitor;
- abuse of power or authority for any unauthorised or ulterior purpose.
- inappropriate behaviour of another member of staff towards a pupil
- an issue about a safeguarding concern previously raised that is not being progressed by the DSL or DDSL as it should be.

The above is not a comprehensive list but is intended to illustrate the range of issues, which might be raised under this policy.

Concerns regarding the conduct of adults which do not meet the harm threshold should be managed in accordance with the School's Low-Level Concerns Policy

The Headteacher/Proprietor provides guidance to employees on the standards it expects from its employees through the policies agreed by the Proprietor such as:

- Health and Safety Policy
- Equal Opportunities Policy
- Harassment and Bullying Policies
- No Smoking Policy
- Security Guidelines Departmental Codes of Practice and through the procedures, agreed with the relevant recognised trade unions and professional associations, for addressing poor standards which include:
 - ❖ Disciplinary Procedure
 - ❖ Grievance Procedure
 - ❖ Capability Procedure

WHEN MIGHT THE WHISTLEBLOWING POLICY APPLY?

Individuals are encouraged to come forward where the individual reasonably believes the information disclosed tends to show wrongdoing and that the disclosure is made in the public interest with genuine concerns knowing they will be taken seriously. A whistleblower should ask a few questions before taking action:

- Is it, or do you believe it to be, illegal?
- Is it, or do you believe it to be, against codes of practice issued by the school, regulatory authorities or a professional body?
- Does it contradict what the employee has been taught, or should have been taught?
- Is it about an individual's behaviour or is it about general working practices?
- Has the whistle blower witnessed the incident?

If any individual raises malicious unfounded concerns or attempts to make mischief, this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances. All allegations should be capable of being dealt with through the disciplinary procedure and will be considered appropriately. Where the alleged activity or behaviour cannot be dealt with under the scope of other procedures then consideration should be given to using this whistleblowing policy.

PROCEDURE

This procedure is to enable employees to express legitimate concern regarding suspected malpractice in the School. Malpractice is not easily defined. However, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, criminal activities, failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health and safety or the environment. This procedure is separate from the

School's procedures regarding grievances and therefore this procedure must not be used by employees to raise grievances about their personal employment situation.

Concern identified → Report to Headteacher/Proprietor → (If concern involves Headteacher/Proprietor) School Advisory Board → Investigation → Outcome → Escalate externally if necessary

HOW TO RAISE A CONCERN – GENERAL

A member of staff will be at liberty to express their concern to the Headteacher. Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The member of staff making the allegation will be kept informed of the progress and, whenever possible, subject to third-party rights, will be informed of the resolution.

Employees are encouraged to set out in writing the background and history of the concern, giving names, dates and places where possible and the reason why they are particularly concerned about the situation. If employees do not feel able to put their concern in writing the matter can be raised by telephone or by way of a meeting with the appropriate person. In any event, employees should try to make an immediate note of relevant details, e.g. what was said in a telephone or other conversation.

Employees are encouraged to express their concerns at the earliest opportunity. The earlier a concern is raised, the easier it is normally to take action. When raising concerns employees must declare any personal interest they have in the matter. Although employees are not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for a concern. However, they should not attempt to investigate a concern or accuse individuals directly. Employees may invite their trade union or professional association to raise the matter on their behalf.

A member of staff who is not satisfied that their concern is being properly dealt with, or whose concern relates to the Headteacher/Proprietor, will have the right to raise the matter in confidence with a member of the School Advisory Board.

HOW TO RAISE A CONCERN - MAIN STEPS

As a first step an employee should normally raise concerns with the Headteacher/Proprietor

If the concern relates to the Headteacher/Proprietor, or if the employee feels unable to raise the matter with the Headteacher/Proprietor, they should approach:

- a nominated member of the School Advisory Board - Mr Michael Betts

In some circumstances, confidential informal advice from the employee's trade union or professional association may help an employee who is unsure of how best to pursue a concern about malpractice.

HOW THE SCHOOL WILL RESPOND

The individual(s) in receipt of the information or allegation (the investigating officer(s)) will carry out a preliminary investigation on a sensitive and confidential basis. This will seek to establish the facts of the matter and assess whether the concern has foundation and can or should be resolved internally. The initial assessment may identify the need to involve third parties to provide further information, advice or assistance, for example involvement of other members of school staff, the school's external auditors, legal or personnel advisors, the police or the regulatory bodies.

The action taken by Handel House School will depend on the nature of the concern. The matters raised may:

- be investigated internally;
- be referred to the Police;
- be referred to an external auditor;
- form the subject of an independent enquiry.

In order to protect individuals and Handel House School, 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 (e.g. pupil protection or discrimination issues or financial irregularities), will normally be

referred for consideration under those procedures. Some concerns may be resolved by action agreed between the employee raising the concern and the person to whom it is reported without the need for investigation. The person with whom the concern is raised will write personally to the employee who has raised the concern as promptly as possible. While timescales will vary depending on complexity, Handel House School will provide regular updates where an investigation extends beyond 20 working days.

- Acknowledging that the concern has been received;
- Indicating how they propose to deal with the matter;
- Giving an estimate of how long it will take to provide a response.

Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer(s), possibly in conjunction with the Headteacher/Proprietor or nominated Advisory Board Member, will consider how best to report the findings and what corrective action needs to be considered. This may include some form of disciplinary action and/or third party referral such as the police.

Employees raising a concern will be informed of the final outcome of any investigation. In some circumstances, however, it may not be possible to reveal the full details where this relates to personal issues involving a third party.

If the whistleblower is dissatisfied with the conduct of the investigation or resolution of the matter or has genuine concerns that the matter has not been handled appropriately, the concerns may be raised with the Headteacher, Advisory Board or another member of staff.

EXTERNAL PROCEDURES

Concerns relating to the Headteacher/Proprietor

Where a whistleblowing concern involves the Headteacher/Proprietor, staff should report the matter directly to a member of the School Advisory Board. The School Advisory Board member receiving the concern will determine the most appropriate course of action, including whether an independent investigation is required and whether referral should be made to external agencies such as the Local Authority Designated Officer (LADO), the Department for Education (DfE), the Independent Schools Inspectorate (ISI), the Police or other relevant regulatory bodies.

Concerns relating to an employee

Where all internal procedures have been exhausted, an employee shall have a right of access to the Headteacher who will act in an independent capacity in light of the allegations raised.

An employee may be entitled to raise a concern directly with an external body, for example, HSE (03000031747), LADO (01522554674 or LSCP_LADO@lincolnshire.gov.uk), ISI (02076000100), DfE (03700002288), Police, Disclosure and Barring Service (where referral duties arise - 03000200190), Teaching Regulation Agency (02075935393), where the employee reasonably believes:

- That exceptionally serious circumstances justify it;
- That the School would conceal or destroy the relevant evidence;
- That the employee would be victimised by the School; or
- Where the Secretary of State has ordered it.

Staff may also contact the NSPCC Whistleblowing Advice Line

- Telephone: 0800 028 0285
- Email: help@nspcc.org.uk

This service is available for staff who do not feel able to raise concerns internally.

HARASSMENT OR VICTIMISATION

The Proprietor/Headteacher recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal by those responsible for the malpractice. The Proprietor/Headteacher will not

tolerate harassment or victimisation and will take action to protect employees when they raise concerns in good faith. This does not mean that if an employee is already the subject of procedures such as discipline, capability or redundancy, that those procedures will be halted as a result of a concern being raised under the provisions of this policy.

If an employee makes an allegation where the individual believes the information disclosed tends to show wrongdoing, but it is not confirmed by the investigation, no action will be taken against the employee. If, however, an employee knowingly makes malicious and false allegations, disciplinary action may be taken against the employee. Disciplinary action will be taken against an employee if they try to stop another employee from raising a concern or if an employee is responsible for any act of recrimination against an employee who raises a concern. Where an employee may have been party themselves to an act of possible gross misconduct on which they are now "blowing the whistle" this could be considered in mitigation. They are not, however, exempt from disciplinary action. Disciplinary action may be taken against employees if they contact the media (newspapers, TV, radio etc.) with concerns about conduct at work without first following the steps set out in this policy.

CONFIDENTIALITY

Employees who wish to raise a concern under this procedure are entitled to have the matter treated confidentially and the employee's name will not be disclosed to the alleged perpetrator of malpractice without the employee's prior consent. It may be appropriate to preserve confidentiality that concerns are raised orally rather than in writing where possible. It must be appreciated, however, that the investigation process may reveal the source of the information and a statement by the employee may be required as part of the evidence. All employees have a duty not to disclose or make public any professional or trade secret or confidential information they come across in their work. If there is any evidence of criminal activity, then the police will be informed in all cases. This whistleblowing policy does not affect the contract of employment or any confidentiality agreement.

Protection of Whistle blowers

A member of staff who makes a disclosure where they reasonably believe the information disclosed tends to show wrongdoing pursuant to this policy will not be dismissed or subjected to any detriment as a result of such action. (Detriment includes unwarranted disciplinary action and victimisation.) If you believe that you are being subjected to a detriment as a result of making a disclosure under this policy, you should inform the Headteacher immediately. Members of staff who victimise or retaliate against those who have made a disclosure under this policy will be subject to disciplinary action. No employee will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing they do so in good faith and in accordance with the Whistleblowing procedures.

Grievances

A member of staff who feels they have been or are being unfairly treated by Handel House School may bring a grievance under Handel House School's Grievance Procedure. If you do not have a copy of the grievance procedure you may obtain one from the Office.

ANONYMOUS ALLEGATIONS

Employees are strongly encouraged to put their names to their allegations. Anonymous concerns will be considered. Whilst anonymous concerns may be more difficult to investigate, they will be assessed according to the seriousness of the allegation, the credibility of the information provided and the likelihood of obtaining corroborating evidence.

UNTRUE ALLEGATIONS

If a member of staff makes an allegation where they reasonably believe wrongdoing has taken place, but it is not confirmed by the investigation, no action will be taken against them. However, false, malicious, vexatious or frivolous accusations will be dealt with under the School's Disciplinary Procedure.

MONITORING

All concerns raised under this policy will be retained in accordance with the school's Data Retention Policy and UK GDPR requirements, in the strictest confidence. Where the concern is about the Headteacher/Proprietor, the record will be maintained by a nominated member of the School Advisory Board rather than by the

Headteacher/Proprietor. The purpose of this record is to ensure that a central record is kept which can be cross-referenced with other concerns raised in order to monitor any patterns and to assist in monitoring and reviewing the policy.

CONCLUSION

Existing good practice within Handel House School in terms of its systems of internal control, both financial and non-financial, and the external regulatory environment in which the school operates, ensures that cases of suspected fraud or impropriety rarely occur. This whistleblowing policy is provided as a reference document to establish a framework within which issues can be raised confidentially internally and if necessary outside the management structure of the school. This document is a public commitment that concerns are taken seriously and will be actioned. Any actions arising from allegations/investigation must be in accord with the school's disciplinary procedure, which should cover all of the potential areas of concern.

Guidance on terminology used in this policy

Harassment: A person is harassed when they are subjected to unwanted physical or verbal conduct which has the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them

Bullying: A person is bullied when they are subjected to offensive, intimidating, malicious or insulting behaviour which through the abuse or misuse of power makes them feel vulnerable, upset, humiliated or threatened.

Such behaviour may include:

- a staff member shouting at, being sarcastic towards, ridiculing or demeaning a pupil or colleague;
- making physical or psychological threats;
- overbearing supervision;
- making inappropriately derogatory remarks about a pupil or colleague;
- persistent unfair assessment of a pupil or colleague's work;
- Unfairly excluding pupils from classes, projects or events.

Bullying does not include reasonable and constructive criticism of a pupil or colleague's work or behaviour.