Cheapside Church of England Primary School

Policy: WHISTLEBLOWING POLICY 2026-27 (RAISING CONCERNS AT WORK)
MGB Ratification: 2026
Review Date: July 2027

Date of revision	Revisions made
July 2026	Change of dates, inserting Cheapside's information

Signed..... Chair of Governing Body

SCHOOL AIMS

At Cheapside Church of England Primary School, our aim is for all to 'Achieve their best, In thought, In word, In deed'.

- we facilitate opportunities so every child can flourish in a place where they feel safe, **happy and confident**.
- staff **well-being** and professional development is valued and supported in order to fulfil their roles, inspire to and experience personal **fulfilment**.
- the school aims to provide facilities that enables an **optimum learning environment**.
- the **school plays a central role within our community** and enjoys strong **links with the church, local companies and other schools.**
- we create a culture of vigilance to safeguard all children

We create an environment in which staff and others feel they are able to raise concerns in an expeditious and appropriate way, without being worried about possible victimisation and/or harassment as a result of doing so.

1. PURPOSE

1.1 Cheapside CE Primary School aspires to the highest standards of quality, probity, openness and accountability in all its activities. In line with the Public Interest Disclosure Act 1998, this Policy aims to create an environment in which employees, parents, governors and others working with the school, who have concerns about any aspect of the school's work, feel encouraged to disclose information to an appropriate person within the school.

1.2 Staff, because of their close proximity to school practices, are often the first to identify areas or issues that may be of concern. However, they may be reluctant to express these concerns because they feel that

speaking up would be disloyal to their colleagues (including supply staff), or to the school – and they may also be worried that they will be victimised or harassed as a result of their actions.

1.3 This Policy is designed to help create an environment in which staff and others feel they are able to raise concerns without fear of reprisal. By responding to and addressing concerns in the quickest possible time, the school aims to contain such matters within the school. However, staff or others must be able to take matters further if they are dissatisfied with the school's response.

2. SCOPE

The policy is designed to address situations where staff have concerns about unlawful activities. You are protected by law if you report any of the following:

- a criminal offence, e.g. fraud
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the school is breaking the law, e.g. doesn't have the right insurance
- you believe someone is covering up wrongdoing

3. HOW TO RAISE A CONCERN

3.1 You may wish to discuss your concerns in confidence with a colleague first and may find it easier to raise the matter if more than one of you has had the same experience or concerns.

3.2 At any stage of the procedure, you may be accompanied by a friend, colleague, or a representative from your Trade Union or professional association.

3.3 Staff should, if possible, raise a concern in the first instance with the Headteacher or Chair of Governors (Amelia Robinson c/o Clerk to the Governors l.leitch@cheapsideschool.org.uk). Similarly, non-employees, e.g., supply teachers, volunteers or parents of pupils, should raise a concern in the first instance with the Headteacher or Chair of Governors. If in doubt or if the complaint is about the Headteacher, a concern may be submitted to the school office in an envelope marked private for the Clerk to the Governing Body who will then ensure that it is directed to the appropriate person.

3.4 In some cases, the nature or sensitivity of the concern means that this may not always be appropriate. If a person feels they cannot raise their concern within the School, they are able to go directly to the LADO (Local Authority Designated Officer) – 020 8891 7370 or 07774 332675 lado@achievingforchildren.org.uk . They may also do so if, having raised the concern within the school, they feel there has not been an appropriate response.

3.5 For all concerns in respect of any suspected financial irregularity, the Local Authority (RBWM) Head of Finance and Head of Audit and Review must be notified immediately.

4. PROCEDURE

4.1 Concerns are better raised in writing but can be made orally, either by telephone or personal conversation; in either case it is essential to give as much information as possible so that reasonable grounds for the concern can be demonstrated.

4.2 The earlier the concern is raised, the greater the opportunity for the School and Local Authority to take remedial action.

4.3 Advice and guidance on how matters of concern may be raised and pursued can be obtained from the Local Authority, Head of Human Resources.

5. HOW THE SCHOOL AND LOCAL AUTHORITY WILL RESPOND

5.1 Once a concern is raised, the School/Local Authority will respond with an investigation by management. Further courses of action will vary, depending on the issue.

5.2 The Headteacher or Chair of Governors will make initial enquiries. There will be consultation, with the Headteacher, Chair of Governors, and the LADO, to help decide if an investigation is required and if so, what form it should take. This includes concerns raised about supply staff.

5.3 An Investigation Officer will then be appointed.

5.4 As soon as possible and in any case within 10 working days of a concern being raised, the person handling the matter, e.g., the Headteacher, Chair of the school Governing Body, Head of Human Resources, LADO, will write to the individual raising the concern acknowledging that it has been raised and indicating how, as far as possible, it will be dealt with. The individual will be kept informed of progress and will receive a full and final response, subject to any legal restraints.

5.5 In relation to allegations of fraud and corruption in respect of the Governors and the Strategic Director of Children's Services, the Chief Executive will lead the process and will appoint an appropriate Investigating Officer, in liaison with the school. For cases involving Governors, the outcome of the investigation will be reported to the Local Authority governance service.

5.6 Any decision to refer a matter to the Police will be taken by the Headteacher or Chair of the Governing Body, in consultation with involved Local Authority members. The Local Authority will normally wish the Police to be made aware of, and investigate independently, those offenders where financial impropriety is discovered.

5.7 Depending on the nature of the allegation, the Investigating Officer will normally work closely with the School and the Strategic Director of Children's Services to ensure that all allegations are thoroughly investigated and reported upon.

5.8 The Investigating Officer will:

- deal promptly with the matter
- record all evidence received
- ensure that all evidence is sound and adequately supported
- ensure security of all evidence collected
- contact other agencies such as Police
- notify the Council's Insurance and Risk Manager, if applicable, who in turn will notify the RBWM insurers
- assist management to implement Council disciplinary procedures, where appropriate.

The processes outlined above will also apply to Governors.

5.9 The Local Authorities' disciplinary procedures will be used to facilitate a thorough investigation of any allegations of improper behaviour by employees.

6. SAFEGUARDS

Harassment or Victimisation

6.1 The school and local authority recognises that it can be difficult to report a concern, not least because of the fear of reprisal from those responsible for the potential malpractice. The School or Local Authority will not tolerate harassment or victimisation of the person who has raised the issue and will take serious disciplinary action against individuals who perpetrate such harassment.

Confidentiality

6.2 Wherever practical and possible, the School and Local Authority will protect the identity of those raising a concern if they do not wish their name to be disclosed. It must be appreciated, however, that the process of investigation may reveal the source of information and a statement may also be required as part of the

evidence. Advice and support will be provided where this is the case and disclosure of your identify will not be done without your consent unless legally required to do so.

6.3 Anyone may approach the Local Authority confidentially if they so wish and as long as their allegation appears to have been raised honestly and in good faith, their wish for confidentiality will be supported.

6.4 This approach is further supported by decisions of the courts, who have recognised in certain circumstances the identity of persons who have made allegations or given information to the public and other bodies should not be revealed (in the course of legal proceedings, for example). They recognise that disclosure could discourage others from making allegations or giving information to the proper authorities.

Anonymous Allegations

6.5 Individuals raising concerns are strongly encouraged to put their name to any allegation. Concerns expressed anonymously are much less powerful and will only be considered if the Headteacher or Chair of Governors agrees that the allegation demonstrates sufficient cause to take the matter further.

Untrue Allegations

6.6 If someone makes an allegation in good faith and it is not confirmed by an investigation, no action will be taken against the person who has made the report. If, however, an individual makes an allegation, which is subsequently shown to be unfounded, malicious or vexatious, serious disciplinary action is likely to be taken against them.

7. HOW THE MATTER CAN BE TAKEN FURTHER

7.1 This policy is intended to provide all School employees and others with an effective process for raising concerns within RBWM. The Local Authority hopes that those using this process will be satisfied with the way their concerns are treated and any investigations that may be carried out. However, if they are not satisfied and feel they want to take the matter outside the Local Authority, then either the Head of Human Resources or the Monitoring Officer will provide advice as to other options.

8. REPORTING LOW LEVEL STAFF CONCERNS ABOUT A STAFF MEMBER'S BEHAVIOUR (refer to para 424 – 426 in KCSIE)

At Cheapside we promote a culture of openness and transparency in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.
All staff are aware of expected behaviours.

What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with our school's staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Low-level concerns may arise in several ways and from a number of sources. For example:

- suspicion;
- complaint; or
- disclosure made by a child, parent or other adult within or outside of the organisation;
- or as a result of vetting checks undertaken.

It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation

Behaviour which indicates than an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

Low-Level Concern

Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with an organisation's Code of Conduct, and/or;
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Appropriate Conduct

- Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.

The procedure for reporting low-level concerns about a staff's behaviour at Cheapside are as follows:

- discuss the concern with your line manager
- complete the Reporting a Low-Level Concern form (Appendix 1) and hand to a DSL
- DSL/School Leader will take appropriate action

9 RESPONSIBILITY OF OFFICERS / MONITORING OFFICER

The Headteacher and Chair of the School Governing Board have overall responsibility for the maintenance and operation of this policy.

The Headteacher should be notified of all concerns raised through this policy. All concerns raised and the outcomes (in a form which respects the individual's confidentiality) will be maintained by the school.

On request, an annual report on this policy will be presented to the Full Governing Board.

CONTACTS	
Governor Services	01628 796 960
Director of Children's Services (AfC) Kevin McDaniel	01628 796477 07909 656 184
Head of Human Resources	01628 685 810
Head of Finance (Financial issues)	0782 4478 100
Chief Executive of RBWM- Duncan Sharkey	01628 796 205
EXTERNAL	
External Audit (KPMG)	020 7311 1000
Audit Commission (Whistleblowing Line)	020 7798 7999
Public Concern at Work www.pcaw.co.uk	020 3117 2520
Your Local Union Representative	

10. PUBLICITY

10.1 This policy is available to school staff and those who frequent the school so that all internal and external parties related to the school are aware of its existence in the event they have a legitimate concern or complaint.

10.2 This policy has been updated according to RBWM policy and guidelines. It will be reviewed on an annual basis or when there are changes in the law as advised by RBWM.

Reporting Low Level Staff Behaviour Concerns

Record of actions taken as a result of the reported concern:

Your name:		**Clarity around Allegation vs Low-Level Concerns vs Appropriate Conduct** **Allegation:** Behaviour which indicates that an adult who works with children has: • Behaved in a way that has harmed a child, or may have harmed a child • Possibly committed a criminal offence against or related to a child • Behaved towards a child or children in a way that indicates that may pose a risk of harm to children **Low-Level Concern:** Any concern – no matter how small, even if no bigger than a 'nagging doubt'- that an adult may have acted in a manner which: • Is inconsistent with Cheapside's Staff Code of Conduct and/or • Relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about an adult's suitability to work with children. **Appropriate Conduct:** • Behaviour which is entirely consistent with Cheapside's Staff Code of Conduct and the law.
Staff member you are reporting:		
Line Manager/DSL/DDSL you are reporting to:		
Date of Concern		
Time of concern		

What behaviour is concerning you?

Sign_____

DATE	**ACTION**	INITIAL