Mawnan C of E VA Primary School

Whistleblowing Policy

Policy owner	**Headteacher: Jilly Pridmore**
Whistleblowing governor	Tamsin Schoten
Designated safeguarding lead	Jilly Pridmore; Deputy DSL: Jen Law
Approval date	
Next review	September 2027, or sooner following a significant change
Related policies	Child Protection and Safeguarding; Low-Level Concerns; Staff Code of Conduct; Allegations Against Staff; Grievance; Complaints; Data Protection; Online Safety; Health and Safety

At a glance: speak up – we are listening

If you see or suspect wrongdoing, unsafe practice or a safeguarding failure, speak up promptly. You do not need to investigate or prove your concern. We will listen, assess risk, protect children and others, handle information carefully and take appropriate action.

Immediate danger	**Call 999. For a child at risk, follow the Child Protection and Safeguarding Policy and contact the DSL/DDSL or children's social care without delay.**
Usually report to	Jilly Pridmore, Headteacher, verbally or in writing.
If the Headteacher is involved or you cannot approach her	Chair of Governors; alternatively Tamsin Schouten, Whistleblowing Governor, where appropriate. Confirm current contact details via the school office/governance clerk.
If the Chair is involved	Whistleblowing Governor if independent, or the local authority's appropriate governance/HR or safeguarding route.
If internal reporting is unsafe or ineffective	Seek independent advice or contact an appropriate external body, including NSPCC for safeguarding failures. You need not exhaust internal routes before an appropriate external disclosure.
What happens next	Prompt safety assessment; acknowledgement normally within 10 working days; impartial consideration, updates where possible, confidential records and learning.

1. Introduction and commitment

The governing body is committed to openness, integrity and accountability. We expect everyone working with or for Mawnan to raise concerns about wrongdoing, unsafe practice or failures to safeguard children. Speaking up is a contribution to children's welfare and the school's improvement, not disloyalty.

We will foster a culture in which staff can question practice and raise concerns without fear of ridicule, victimisation or retaliation. Concerns will be assessed fairly and proportionately, including when a person is genuinely mistaken. Safeguarding is everyone's responsibility and we maintain an attitude that "it could happen here".

This policy complements, and does not replace, the school's child protection procedures, staff allegations and low-level concerns processes, grievance and complaints procedures. A concern will be routed to the appropriate procedure without requiring the person raising it to start again.

2. Purpose and scope

This policy sets out how to raise, receive, assess, investigate, escalate, record and learn from concerns. It applies as an organisational reporting route to employees, agency and supply staff, trainee teachers, governors, volunteers, contractors and service providers working with or for the school. Statutory whistleblowing rights depend on a person's legal status and the legal conditions; this policy does not imply that every person has identical statutory protection.

The policy may be used for concerns about the school's practices or people acting on its behalf, including those providing contracted services. The school will liaise with an individual's employer or commissioning body where appropriate, while prioritising safeguarding and confidentiality.

3. What can be reported?

Whistleblowing concerns may include information which a person reasonably believes tends to show a past, present or likely future:

- criminal offence, fraud, bribery or financial mismanagement;
- failure to comply with a legal obligation or a miscarriage of justice;
- danger to the health or safety of any person, including safeguarding failures or unsafe premises;
- damage to the environment;
- deliberate concealment of any of the above.

The school also welcomes reports of serious unethical practice, breaches of school policy, unsafe culture, concealment of safeguarding concerns, inappropriate use of confidential information, and misuse of digital or AI systems, including fabricated records, AI-generated harmful imagery or sharing children's personal information with unapproved tools. These concerns will be assessed under the most appropriate policy; not every breach automatically qualifies as a legally protected disclosure.

4. Whistleblowing, safeguarding concerns and grievances

A personal employment grievance (for example a dispute solely about your own contract) will normally follow the Grievance Procedure. A concern affecting others or the public interest may also qualify for whistleblowing protection even where the person raising it is personally affected. The school will not dismiss a disclosure solely because it overlaps with a grievance.

Any concern about a child must be reported without delay to the DSL (Jilly Pridmore) or DDSL (Jen Law) under the Child Protection and Safeguarding Policy. If a child is in immediate danger, call 999. If the DSL/DDSL is unavailable, staff must take appropriate action through children's social care or the police; do not wait for an internal response.

Concerns about the conduct of an adult, however small, must be reported through the school's allegations/low-level concerns procedures. Allegations potentially meeting the harm threshold must be referred to the appropriate case manager, who should seek LADO advice in accordance with the safeguarding policy before investigating or notifying the adult. If the concern is about the Headteacher, report to the Chair of Governors; if about the Chair, use an independent governor or the local authority/LADO as appropriate. Whistleblowing remains available where safeguarding practice is unsafe or concerns are suppressed.

5. How to raise a concern

Raise the concern as soon as possible, verbally or in writing, with the Headteacher. If the Headteacher is implicated, you feel unable to approach her, or the response is inappropriate, contact the Chair of Governors or the Whistleblowing Governor. If both are implicated or no independent internal route is suitable, seek advice from the local authority or an appropriate external body. The school must ensure that current direct contact details are available to staff separately from this policy.

Share what you know: dates, places, people involved, what you observed or were told, why you are concerned and any documents you already legitimately hold. Distinguish facts from suspicions. You do not need proof, must not conduct your own investigation, access records without authority, confront those involved or delay reporting while collecting evidence.

You may ask for a private meeting and seek advice or support from a trade union representative, professional association, colleague or Protect. The school will permit a companion at meetings under this procedure wherever practicable, without implying a statutory right to accompaniment at every meeting.

6. Immediate response and triage

The recipient will promptly assess immediate risks to children, adults, evidence and ongoing operations; take urgent protective action; identify any conflict of interest; decide whether the matter falls under safeguarding, LADO, police, HR, finance, health and safety or another process; and arrange an independent decision-maker where needed. A whistleblowing enquiry must not compromise a police or LADO-led process.

A written acknowledgement will normally be sent within 10 working days, where contact details are available. It will explain the route being taken, likely next steps, an indicative timescale and available support. Urgent safeguarding action must occur immediately and must never wait for this acknowledgement.

7. Fair and proportionate investigation

The appointed case manager will decide whether an investigation is needed and, where appropriate, appoint an investigator without a conflict of interest. Terms of reference will identify the issues, scope, evidence sources, responsibilities and reporting arrangements. An external investigator may be commissioned where independence or specialist expertise is required.

Evidence will be gathered lawfully and securely; accounts will be recorded accurately; relevant individuals will have a fair opportunity to respond at an appropriate stage; and decisions, rationale, findings and actions will be documented. Timing of informing the person complained about will be guided by safeguarding, LADO/police advice, evidence preservation and fairness—not an automatic requirement to notify them immediately.

The person raising the concern will receive appropriate progress updates and, where possible, a summary of the outcome. Privacy, safeguarding and employment obligations may prevent disclosure of witness information, disciplinary details or the full report. Where a concern is not substantiated, this does not by itself mean it was raised improperly.

8. Protection, support and confidentiality

The school will not tolerate retaliation, threats, bullying, detrimental treatment or attempts to silence anyone who raises a concern. Report suspected retaliation to the Chair of Governors or an independent reporting contact; it will be considered separately and may lead to disciplinary or other appropriate action.

The Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998 and subsequent legislation, provides protection for workers who make protected disclosures when statutory conditions are met. A reasonable belief that specified wrongdoing is occurring or likely and that disclosure is in the public interest is central; a requirement to act "in good faith" is not a general prerequisite for protection. The school will support genuine concerns even where they do not meet the statutory definition.

We will protect the identity of the person raising a concern as far as reasonably possible, but cannot guarantee absolute confidentiality or anonymity: disclosure may be necessary for safeguarding, a fair investigation or legal obligations. Information will be shared only with those who need it. Confidentiality clauses cannot lawfully prevent protected disclosures.

Anonymous concerns will be considered and assessed according to seriousness, available information and the possibility of checking facts; anonymity may limit follow-up or feedback. A deliberately fabricated allegation may be addressed under appropriate procedures, but an honestly raised concern that is not upheld will not lead to disciplinary action merely because it was mistaken.

9. External reporting and escalation

Staff may seek confidential advice and may make disclosures to an appropriate prescribed person where legal conditions are met. Internal reporting is encouraged where safe and effective but is not a prerequisite to all lawful external reporting. Different legal tests apply to disclosures to employers, prescribed persons and wider third parties; obtain independent advice if unsure.

For concerns about safeguarding failures that cannot safely be raised internally, contact the NSPCC Whistleblowing Advice Line: 0800 028 0285; help@nspcc.org.uk. For immediate danger call 999; for a child needing protection use the school's current local authority children's social care referral arrangements. Ofsted and the Department for Education may be appropriate for matters within their respective remits. Use the current GOV.UK prescribed-person list to identify the correct body. Do not publish children's or staff members' confidential information on social media.

10. Records, information governance and oversight

The case manager will maintain a restricted-access register recording the date, nature, recipient, immediate risk assessment, confidentiality request, route taken, investigator, milestones, outcome, feedback, closure and actions. Case files will be held separately from general staff-accessible systems, retained under the school's approved retention schedule and relevant legal/safeguarding requirements, and shared only on a need-to-know basis.

The Whistleblowing Governor will receive appropriate anonymised or suitably restricted oversight information at least annually and sooner for serious matters, without participating in a case where there is a conflict of interest. The governing body will monitor themes, delays, retaliation risks, actions and whether staff understand how to speak up.

11. Learning, training and review

Following closure, the school will consider whether policies, training, supervision, safeguarding arrangements, technology controls or governance need to change. Actions will have an owner and review date. Lessons will be shared appropriately without identifying individuals unnecessarily.

The policy will be explained at induction, available to employees and other adults working with the school, referenced in safeguarding training and staff sign-off, and reviewed annually or following significant changes. All staff must read KCSIE 2026 Part One in full and follow school safeguarding procedures.

Appendix A — reporting route: quick reference

1. Identify and act	**Immediate danger: 999. Child safeguarding: DSL/DDSL or children's social care without delay.**
2. Speak up	Normally Headteacher. If implicated or inappropriate: Chair of Governors or independent Whistleblowing Governor.
3. Escalate	If internal routes are unsafe/ineffective: relevant local authority route, NSPCC, prescribed person or independent advice.
4. Record and protect	Write down factual details; do not investigate; protect personal information.
5. Follow through	Expect acknowledgement, proportionate handling, updates where possible and action to prevent recurrence.

Appendix B — confidential monitoring record (restricted access)

Case identifier / date	_____
Concern and category	_____
Recipient / conflict check	_____
Immediate safety action	_____

Confidentiality / anonymity request	_____
Referral / investigator / terms	_____
Key actions and dates	_____
Outcome / rationale	_____
Feedback / retaliation check	_____
Lessons / action owner / due date	_____
Closure / retention review	_____

Appendix C — useful contacts and authoritative guidance

- NSPCC Whistleblowing Advice Line: 0800 028 0285 | help@nspcc.org.uk | https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/
- Protect (independent whistleblowing advice): 020 3117 2520 | https://protect-advice.org.uk/
- Ofsted whistleblowing: 0300 123 3155 | whistleblowing@ofsted.gov.uk (check remit before reporting)
- GOV.UK prescribed persons: https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2
- GOV.UK KCSIE 2026: https://www.gov.uk/government/publications/keeping-children-safe-in-education--2
- GOV.UK whistleblowing for employees: https://www.gov.uk/whistleblowing
- Acas whistleblowing guidance: https://www.acas.org.uk/whistleblowing-at-work
- Cornwall LADO and children's social care: use current details in Mawnan's Child Protection and Safeguarding Policy; verify before publishing this policy.
- School contact directory: insert verified direct contact details for Chair of Governors, Ruth Grimmer and the local authority reporting route before approval.