

# Examinations – Whistleblowing Policy



## King Henry VIII 3-19 School Ysgol 3-19 Brenin Harri'r VIII

We believe in the limitless capacity for everyone to achieve great things.

Effective from: November 2025

Approved by Governors (Resources Committee): November 2025

Next Review Due: November 2026

## **INTRODUCTION - What is Whistleblowing?**

In this policy 'Whistleblowing' means the reporting by employees of suspected misconduct, illegal acts or failure to act, within the School.

The School expects the highest standards of conduct from all employees, and encourage employees and others with serious concerns about any aspect of the School's work force to come forward and voice those concerns in a safe environment. This policy enables employees to raise concerns at an early stage and in the correct way.

If you are considering raising a concern you should read this policy first. It explains:

- The types of issues/disclosures that can be raised
- How the person raising a concern will be protected from victimisation and harassment
- How to raise a concern
- What the School will do

Whistleblowing is defined as:

The disclosure by an employee of confidential information which relates to some danger, or illegal or unethical conduct connected with the work place, be it of the employer or his/her fellow employees.'

## **AIM OF THE POLICY**

The School is committed to achieving the highest possible standards of service and the highest possible ethical standards in all of its practices and will treat whistleblowing as a serious matter. In line with the School's commitment to openness, probity and accountability, employees are encouraged to raise concerns which will be taken seriously, investigated and appropriate action taken in response.

In its application, this policy seeks to ensure that there is no discrimination against employees either directly or indirectly on grounds prohibited by the Equality Act 2010 which covers age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation This policy is inclusive of partners of the opposite or same sex.

The policy is designed to ensure that you raise your concerns about wrongdoing or malpractice within the School without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

The policy aims to:

- Encourage you to feel confident in raising serious concerns at the earliest opportunity
- Provide avenues for you to raise those concerns and receive feedback on any action taken
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- Provide reassurance that you will be protected from possible reprisals or victimisation if you have made disclosure in good faith

This policy also covers whistleblowing relating to alleged:

- unlawful conduct
- failure to comply with a statutory or legal obligation

- potential maladministration, misconduct or malpractice
- health and safety issues including risks to pupils and members of staff
- abuse of authority
- mistreatment of any person
- action that has caused or is likely to cause physical danger to any person or risk serious damage to School property
- sexual, physical or emotional abuse of members of staff or pupils
- unfair discrimination or favouritism
- behaviour which is discriminatory towards someone with a protected characteristic under the Equality Act 2010.
- racist incidents or acts, or racial harassment or intimidation
- attempt to prevent disclosure of any of the issues listed

## RELEVANT LEGISLATION

The School recognises its responsibilities under the following legislation:

- Employment Rights Act 1999
- The Equality Act 2010
- GDPR

The policy should be read in conjunction with the School's:

- Codes of Conduct for employees
- Disciplinary Policy
- Equality Policy
- Complaints Policy

If an employee is the subject of disciplinary or redundancy procedures they will not be halted as result of whistleblowing.

## POLICY SCOPE

This policy is intended to enable those who become aware of wrongdoing in the School affecting some other person, to report their concerns at the earliest opportunity so that they can be properly investigated. The Whistleblowing Policy is not intended to replace existing procedures:

- If your concern relates to your own treatment as an employee, you should raise it under the existing complaints procedures.
- Complaints about school matters are dealt with under a separate procedure called the School's Complaints Policy

## WHO CAN RAISE A CONCERN UNDER THIS POLICY?

The policy applies to all:

- Employees of King Henry VIII 3-19 School
- Those providing services under a contract or other agreement with the School
- Voluntary workers working with the School

## **SAFEGUARDING WHISTLEBLOWERS**

If you raise a genuine concern under this policy you will not be at risk of losing your job, or suffer any form of retribution, victimisation or detriment as a result. It won't matter if you are mistaken provided you genuinely believe that you are acting in the public interest. Of course we cannot extend this assurance to an individual who maliciously raises a matter they know to be untrue.

## **HARASSMENT AND VICTIMISATION**

The School is committed to good practice and high standards and to being supportive of you as an employee/worker.

The School recognises that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer, your colleagues.

The School will not tolerate any harassment or victimisation of a whistle-blower (including informal pressures) and will take appropriate action to protect you when you raise a concern, and will treat such harassment and victimisation as a serious disciplinary offence, a breach of contract.

## **CONFIDENTIALITY**

Whilst a qualifying disclosure is expected to have substance, it is not expected that the employee raising the disclosure will need to prove it is true. It is the responsibility of the Designated Officer.

All disclosures will be treated in confidence and every effort will be made not to reveal your identity if that is your wish, unless disclosure is required by law.

In some circumstances, for example in disciplinary processes, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

The School will not place employees under pressure to give their name and will give due consideration to proceeding with investigating the concern on the basis of an anonymous allegation.

## **ANONYMOUS ALLEGATIONS**

This policy encourages you to put your name to your allegation whenever possible - anonymous concerns are much less powerful and it will be much more difficult to provide feedback to you. Nonetheless anonymous concerns will be considered under this whistleblowing policy especially concerns raised relating to the welfare of children.

In relation to determining whether an anonymous allegation will be taken forward the School will take the following factors into account:

- the seriousness of the issue raised
- the credibility of the concern
- the likelihood of confirming the allegation from attributable sources, and obtaining information provided.

The provisions of the GDPR must be observed during the process, particularly in disclosure, use and processing of personal information.

## **UNTRUE ALLEGATIONS**

If an allegation is made which it is believed to be untrue and it is not confirmed by further enquiry or by an investigation, no action will be taken against the person who raised the initial concern. If, however, the enquiry/investigation shows that untrue concerns were malicious and/or vexatious or made frivolously or made for personal gain, then the School will consider taking appropriate action which could include disciplinary action.

## **SUPPORT FOR YOU**

The School have a duty of care to their employees. Support for the individuals involved in this process is key to fulfilling this duty. Any concern that is raised will be taken seriously.

For those individuals who raise concerns and for those individuals who may have concerns raised about them, the School will do all it can to help you throughout the process. Support for employees will include the offer of access to counselling and medical advice and support. Individuals will be advised to contact their Trade Union representative, or a work place colleague (not involved in the area of work to which the concern relates) for additional support. Individuals will also be offered an additional point of contact for support during the process.

Any meetings that may be required as part of the process can be arranged away from the workplace if necessary and individuals have the right to be accompanied by their trade union representative or work based colleague.

Unless there are legal reasons why this cannot be done, you and the person against whom allegations are made will be kept informed of the progress and outcome of any investigation by the Designated Officer.

## **PROCEDURE FOR MAKING A WHISTLEBLOWING ALLEGATION**

If possible the concern should be put in writing for the avoidance of doubt. It should set out:

- the background and history of the concern;
- give names, dates and places where possible,
- an explanation of the reason for the concerns.

If you feel unable to put the matter in writing you can still raise your concern verbally. Also if you feel that you cannot express your concerns with the Council / School Governing Body, you can also ask your Trade Union representative or work based colleague to raise the matter on your behalf and/or to support you in raising the concern.

If the concern needs to have Police or other statutory authority involvement, the whistleblowing process will be halted until the statutory authorities have completed their investigations and confirmed that it is appropriate to continue with the whistleblowing process. This must take place even if the statutory authorities take the decision not to pursue a criminal investigation.

## **WHAT THE SCHOOL WILL DO**

A key principle for the School will be to be fair to all employees, initial enquiries will be made by the Designated Officer / person appointed to decide whether an investigation is appropriate and if so what form it should take.

The concern raised may require the following:

- enquiry internally in School
- need to be passed to the Police if it relates to alleged criminal activity

- need to be referred through established child protection procedures

At this stage concerns / allegations are neither considered founded or unfounded pending the investigation if deemed necessary.

## **HOW THE MATTER CAN BE TAKEN FURTHER**

This policy is intended to provide you with a route within the School to raise concerns. However, if you do not wish to raise concerns internally or if the concern has not been dealt with satisfactorily, the following are possible contact points. If you take the matter outside the School, you should ensure that you do not disclose confidential information unless that disclosure is privileged and relevant to the concern raised. Anyone proposing external disclosure should seek independent legal advice.

## **REVIEW OF THE POLICY**

The effectiveness of the policy will be monitored in the following ways:

- The policy will be the responsibility of the Safeguarding Officer, to review ensuring legal compliance and best practice
- The Safeguarding Officer will be responsible for reporting on whistleblowing incidents and number of cases. The report will include a summary of the concerns raised. The report will not include any employee names.
- Periodic internal audits of the effectiveness of the whistleblowing arrangements will be undertaken, including
  - Record of the number and types of concerns and the outcome of investigations
  - Feedback from individuals who have used the arrangements including staff awareness, trust and confidence in the arrangements
  - Any complaints of victimisation
  - Any complaints of failures to maintain confidentiality
  - Any relevant litigation

The outcomes from the monitoring of the policy will be reported to the Head Teacher.