



WHISTLEBLOWING POLICY AND PROCEDURE

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1. Introduction

Rose Hill School is dedicated to providing the utmost care for its pupils and staff. We aim to ensure that all members of the school community feel safe in the knowledge that they can voice any concerns in confidence and that they will be taken seriously and dealt with appropriately. We foster an all-inclusive culture where all pupils feel accepted regardless of their background, gender, faith or culture. (see EDI Policy)

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult position. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardize their colleague's career. All staff must remember that the welfare of the child is paramount. This policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

Rose Hill School takes responsibility for ensuring that all staff are aware of whistleblowing policy and procedures and made to feel comfortable that they can voice their concerns no matter what the circumstances.

2. Definition of 'whistleblowing'

Whistleblowing inside the workplace is defined as the reporting by workers or ex-workers of wrongdoing, such as fraud, malpractice, mismanagement, breach of health and safety law, or any other illegal or unethical act either on the part of management, the Governing Council or fellow employees. Workers may include volunteers, contractors and outside agencies or others.

3. Reporting concerns to the school

If you have a concern about another member of staff you should report it to a member of the school's Senior Leadership Team (Head, Bursar, or Deputy/Assistant Heads) and/or the Designated Safeguarding Lead. Complaints about the Head should be reported to the Chair of Governors. (See Low Level Concerns Policy)

If your concerns are low level, please make sure you inform the Head. Please refer to Low-Level Concerns Policy for further information. In all cases where you are unsure about a member of staff, you must speak with the Head.

All concerns will be listened to and taken seriously by the school. If you are in any doubt as to whether a concern is valid, you should report it and the school can decide to what extent it needs to be investigated.

4. Wider disclosure



We encourage all our staff to follow the internal procedures outlined in this policy, but understand that in some cases you may feel it is necessary to take your concerns to external agencies. Staff should only approach external agencies regarding their concerns without discussing them internally first if:

- they feel that they are being discriminated against and that there is no internal authority that can be contacted with trust
- they reasonably believe that they will be victimized if they follow internal procedures for whistleblowing
- they believe that the concern that they have raised has not been taken seriously or acted upon correctly.

We urge staff who take their concerns to external agencies to be careful not to disclose any confidential information. **Note: it is against the law to publish any information which may lead to the identification of a member of staff who is subject to an allegation.**

The authorities that may be of help to you are:

Children's Social Care Services and, in the case of an allegation made against a member of staff, the LADO (Local Area Designated Officer)

Police

NSPCC

Health & Safety Executive

Audit Commission

Relevant professional bodies or regulatory organizations, e.g. IAPS, ISI.

Department for Education

5. Confidentiality

All concerns will be treated in confidence, and the school is committed to protecting the identity of whistleblowers as far as is possible. However, in some circumstances it may not be possible to do this, for example, if it will prevent a thorough investigation taking place, if there is reason to reveal the name by law, or the whistleblower has to give evidence at any hearings.

In cases where identities are revealed for whatever reason, the school will do its best to support all parties involved and protect them from discrimination and victimization.

Confidentiality is a priority throughout any investigation, and continues to be once the investigation is over, and we urge staff to follow closely all guidelines relating to confidentiality. Any member of staff who has acted knowingly against this, or revealed confidential information unnecessarily or for vicious reasons, may face prosecution.

6. Anonymous allegations

We would encourage staff to put their name to concerns made as it will aid a more thorough investigation. However, the school will investigate all anonymous allegations seriously, following the proceedings outlined in this policy as far as is possible.

7. False allegations

Rose Hill School encourages all of its staff to voice their concerns and allegations safe in the knowledge that those who make allegations in good faith that do not prove to be true will not be reprimanded.

The school may take disciplinary action against staff who make claims that are found to be knowingly false, malicious, or for personal gain.

8. Low Level Concern & Concerns that do not meet the harm threshold

Our Governors have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold set out above. 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.
We have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children. (see Low Level Concern Policy).

Low level concerns

As part of our whole school approach to safeguarding, we ensure that we promote an open and transparent culture 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.

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable us to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported. If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, then this should be referred to the Head.

What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in the paragraph below.

This part of the guidance is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the school. This guidance should be followed where it is alleged that anyone working in the school that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

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 may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered 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;
 - engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- or,
- using inappropriate sexualised, intimidating or offensive language.

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.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold are shared responsibly and with the DSL, Head or Chair of Governors, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools from potential false allegations or misunderstandings.

For full details, and what to do next, please see our Low-Level Concerns Policy.

9. Responding to a concern

The school will investigate all allegations and concerns but the act of investigation does not indicate that the school has accepted the allegations as true.

Usually, the first course of action will be one of the following:

- an investigation by managers, internal audit, or through the disciplinary process
- an investigation under other procedures such as child/adult protection
- an investigation under procedures designed to deal with allegations made against professionals
- a referral to the police
- a referral to the external auditor or other external investigation
- an investigation under other forms of prosecution and inspection such as the protection of public health and safety
- a referral to an independent investigator.

Any concerns that fall under specific procedures will be followed up as described in their specific policy, e.g., child protection and safeguarding issues will be followed up as described in the school's child protection and safeguarding policy.

10. Whistleblowing procedures

10.1 The role of the whistleblower

Concerns will usually be dealt with in this way:

1. Staff will raise their concern with the LT either in person or in writing. If a member of the SLT is the subject of the concern, they should go straight to the Head. Staff will be dealt with in confidence and invited to an interview to discuss the allegation. Staff can go straight to the Chair of Governors with their concern, but they will be asked to explain why they did not feel comfortable taking it to a member of their leadership team.
2. The member of the LT who has heard the concern will decide upon the next course of action. If they decide that it is a genuine concern, and that it is appropriate to follow the whistleblowing procedure, they may take the matter to the Head or the Chair of the Governing Council.
3. If there is any reason why the member of staff making the complaint or raising the concern feels that they are unable to speak any member of the School or Governing Council, they should contact the relevant authority. Your union may be a helpful source of advice if you need to discuss a concern in confidence.

10.2 Role of the Leadership Team

Hold an interview

Once an allegation has been brought to their attention, the senior staff member, Head or Chair of Governors will hold an interview with the person making the allegation, in confidence.

This may come under low level concern, and procedures must be followed in Part four of Keeping Children Safe in Education, Sept 2025.

If the allegation is to be dealt with as a Safeguarding issue the "Child Protection Procedures for Managing Allegations against Staff" will be followed and the LADO must be contacted within 24 hours. In all cases the school will refer to Keeping Children Safe in Education, 'Part four: Safeguarding concerns and allegations made about staff, including supply teachers,



volunteers and contractors'.

The LADO will advise whether the school, the police or Social Services will investigate. This will take place immediately if there is concern that a child is at risk of harm, or as quickly as possible if this is not the case. If the school conducts the interview, staff will:

- get as much information about the basis of the allegation as they can, and record what is discussed
- discuss the next action points and steps that will be taken with the staff member who has raised the allegation, and ensure that they fully understand what is going to happen; if the standard whistleblowing procedure is not going to be followed, this should be explained and an alternative procedure outlined
- provide support to the whistleblower. They may be worried about their position, getting someone else into trouble, or what they suspect may be happening.

Staff may want to seek the support of their trade union when going through whistleblowing procedures. Staff are allowed to take a representative from their trade union to their interview and subsequent meetings.

Decide on a course of action

If there is cause for concern once the interview has been carried out, the leading member of staff will take the information that they have recorded to the Head (or Chair of Governors if the Head is of concern).

If it is decided that no further action will be taken this will be explained to the whistleblower within 5 days. This may be because:

- the leadership member does not feel that there is enough evidence to warrant a continued investigation and that it is unlikely that any malpractice has occurred or will occur;
- there is a belief that the whistleblower is not acting in good faith;
- the matter has already been raised and is being investigated.

The Head, if not already involved, will be informed of the concern even if no further action is to be taken.

10.3 Role of the Head and Governing Council

The person who receives the report - whether it is the Head or Governing Council - must act on the concern fully. If there is a good reason not to, this will be explained at the next Governing Council meeting and reported back to the whistleblower.

The Head or Chair of Governors will decide whether any external authorities (for example the Disclosure & Barring Service) need to be reported to on the matter, or whether it is a case for internal investigation. Instances of fraud or financial malpractice must be referred to the Charity Commission.

The decision and progress of the case will be reported back to the leadership member involved, and this will be reported by them to the whistleblower.

The outcomes of any investigations will be reported to the whistleblower in writing to their home address within 10 days of the conclusion of the investigation unless this falls within a school holiday. If the investigation is scheduled to conclude in a holiday the whistleblower will receive written confirmation of when they can expect to hear the outcome. If they do not receive any information and this time has passed, they may appeal for information through their manager or any relevant external authorities.

11. Recording, monitoring and evaluation

All staff concerned and involved with any allegation or investigation should keep good records of meetings they attend, discussions that are held, and any outcomes or action points that have been decided. The Head and the Governing Council will review and



evaluate all allegations, how they have been dealt with, and their outcomes, to prevent similar future cases, and ensure that procedures are being used correctly and are effective.

This policy will be reviewed annually and any relevant cases that have come up during the past year will be considered when it is being reviewed.

12. Outcomes

If the whistleblower is dissatisfied and feels that an allegation that they have made has not been dealt with seriously or properly, they can take the matter up with the local authority and/or IAPS. The school will try our best to deal with allegations fairly and effectively.

13. Independent advice

This policy is designed to help staff with any whistleblowing concerns and procedures, but the school understands that some staff may wish to get advice from independent external agencies.

14. Contact details

Name	Contact Number	Email
Nick Powell Chair of Governors	Via the school 01892 525591	Contact through the Clerk to the Governors: clerktothegovernors@rosehillschool.co.uk
Emma Neville Head	01892 525591	head@rosehillschool.co.uk
Mike Bryan Bursar	01892 525591	bursar@rosehillschool.co.uk
Children's Social Care Services	03000 41 61 61	Social.services@kent.gov.uk
LADO (Local Authority Designated Officer)	03000 41 08 88	GCSXsafeguardingunit@kent.gcsx.gov.uk kentchildrenslado@kent.gov.uk

If you have concerns about a member of staff and need to contact the Local Authority Designated Officer (LADO) you can do so using the following contact number 03000 41 08 88. The LADO may also be contacted by using the following email address GCSXsafeguardingunit@kent.gcsx.gov.uk or kentchildrenslado@kent.gov.uk.

Please read in conjunction with the school's Safeguarding and Child Protection Policy, Staff Code of Conduct and Handbook and Keeping Children Safe in Education, 'Part four: Allegations made against/Concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors'.

Reviewed by, Ms E Neville, September 2025