LONDON BOROUGH OF NEWHAM

WHISTLEBLOWING POLICY

FOR

SCHOOL BASED STAFF

June 2026

WE ARE NEWHAM.

The Governing Board of Ellen Wilkinson Primary School

adopted this Policy on 9th July 2026

1.0 Policy Statement

This policy applies to all employees of local community and voluntary controlled schools. The school is committed to the highest standards of openness, integrity and accountability. Malpractice is taken very seriously. In line with this commitment, all employees and other agencies who wish to make a disclosure of malpractice, in the public interest, should come forward and voice their concern (s).

1.1 The purpose of this policy is to:

- Draw employees' attention to the Public Information Disclosure Act 1998
- Meet statutory obligations and ensure compliance with relevant codes of practices
- Provide avenues for employees to raise concerns of wrongdoing and malpractice
- Ensure that employees receive a response to their concerns and disclosures
- Provide support to employees who raise concerns about wrongdoing or malpractice
- Promote accountability and integrity throughout the school
- Help to uphold the reputation of the school and maintain public confidence
- Deter malpractice

This Whistleblowing Policy is intended to encourage and enable those covered by the policy to raise serious concerns at an early stage, in the right way and to do so without fear of recrimination, victimisation, discrimination or disadvantage. All concerns/disclosures raised with the school will be treated in the strictest confidence. and every effort will be made to conceal the identity of the discloser if anonymity is requested. Whistle blowers are protected by law from suffering a detriment, bullying or harassment from another employee(s).

1.2 Employees can get further support from:

The School's Human Resources provider

ACAS website– www.acas.org.uk

Public Concern at Work– www.pcaw.co.uk

Public Interest Disclosure

It is recommended that all employees contact their respective Newham union branch or district for support. The email addresses for the current unions are provided in the following details.

Name	Union	Contact Details
Cathy Hanlon	GMB	catherine.hanlon@newham.gov.uk

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Stella Ikanik	GMB	stella.ikanik@gmbactivist.org.uk
Matthew Dobbs	Unison	Matthew.Dobbs@newham.gov.uk
Donford Vardon	Unite	donford.vardon@newham.gov.uk
Gary Wilkie	NAHT	gary.wilkie@lihtrust.uk
Louise Cuffaro	NEU	louise.cuffaro@neu.org.uk
Liam O'Hanrahan	NEU	liam.ohanrahan@neu.org.uk
Andrew Pointon	NASUWT	newhamnasuwtlocalsecretary@gmail.com
Anthony Wilson	ASCL	anthony.wilson@ncst.net

2 The Procedure

2.0 The purpose and principles of this procedure

- Enable employees, contractors working for the school, the school's partners and those supplying goods and services to the school to report any serious concerns they have about service provision and conduct of staff.
- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Employees should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially.
- Whistleblowers who report directly to the media, rather than following this policy will usually lose the whistleblowing rights covered by this policy
- No employee will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because he/she has raised a legitimate concern.
- Victimisation of an employee for raising a qualified disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this procedure the organisation's disciplinary procedure will be used, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees, contractors, school partners and those supplying goods and services to

the school should not agree to remain silent.

2.1 What is not covered:

This procedure is for disclosures about matters other than a breach of an employee's own contract of employment. If an employee is concerned that his/her own contract has been, or is likely to be, broken, he/she should use the organisation's Resolution Policy.

This policy cannot be used to deal with serious and/or sensitive matters that are covered by other school policies and procedures, for example:

- Staff complaints about their employment should be dealt with by way of the School's Grievance, Disciplinary and Bullying & Harassment Policies and Procedures.
- Customer complaints about the school's services should be dealt with via the School's Complaints Procedure. This will also include low level concerns and how to manage these low-level allegations in accordance with the school procedures
- Issues that have already been settled by means of other school procedures.
- Where a manager has concerns about a member of staff whom they manage.

In situations where other policies and procedures have been ineffective, not followed, or cannot be implemented, or if the parties responsible for such policies are involved (such as the headteacher or governing board), the appropriate course of action may be to follow the whistleblowing policy.

2.2 The Local Authority and School's Expectation:

The Local Authority and School have an obligation to its employees and pupils. It is expected that employees and other organisations that it deals with to bring to its attention any issues of concerns of malpractice, which may be in the public interest. The Local Authority and school are committed to the highest possible standards of openness, probity and accountability. For this reason, concerns/disclosures about malpractice will be taken very seriously and employees are encouraged t o raise their concerns under this procedure in the first instance.

2.3 The Local Authority's & Schools Commitment:

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The law provides protection for employees who raise legitimate concerns that is specifically "in the public interest" which might otherwise be regarded as confidential, if the disclosure falls into one of the categories outlined below:

a) A criminal offence

b) Financial misconduct.

c) A miscarriage of justice has happened, is happening, or is likely to happen.

d) An individual's health and safety have been, is likely to be, or is being jeopardised or in danger

e) The environment is, has been, or is likely to be, damaged

f) Information falling into any of the above categories has been, is being or is likely to be deliberately concealed.

2.4 Confidentiality

The school will do its best to protect whistleblower's identities when they raise a concern or make a disclosure and wish to remain anonymous. Every effort will be made to preserve confidentiality. However, if the evidence is required in Court proceedings, then it may not be possible to maintain anonymity; this may be subject to the decision of the Courts. Should there be a cause for concern with regards to a safeguarding issue or needs and the school believe that there would be a significant harm to a child, then it may require a breach of confidentiality providing that this is discussed in advance to the LADO the (Local Authority Designated Officer).

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2.5 Harassment and Victimisation

The Local Authority and School will not tolerate any harassment, victimisation or informal pressures of its employees. The Local Authority and School recognises that the decision to report a concern can be a difficult one to make. An employee who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because he/she has made a disclosure.

The Local Authority and School will initiate appropriate action to protect any employee who whistleblows.
Any investigation undertaken in response to a concern or a disclosure, will not influence, or be influenced by any disciplinary or redundancy procedures that already affects an employee.

2.6 How to raise a concern or disclosure

There are several agreed contacts for employees to raise concerns with under the Whistleblowing Policy. This enables the employee to choose the person to whom they wish to make the disclosure.

Employees who have a concern about any wrongdoing should normally raise their concerns in the first instance with their Line Manager. If however the employee feels unable to raise the matter with the line manager, the concern maybe raised with the Head Teacher or a member of the Senior Leadership Team (SLT). If the employee feels unable to raise their concern with any member of the school management team it may be raised with the:

- Chair of Governors
- LADO the (Local Authority Designated Officer
- The Head of HR at the Schools Commissioned Provider
- Director of Education

It is recommended that all employee's contact a local trade union office for advice before raising a concern or disclosure through the whistleblowing policy. Concerns may be raised orally or in writing. The employee should make it clear if they want to raise the matter in confidence.

The person with whom the concern has been raised with may hold a preliminary meeting to discuss the most appropriate route. The employee may bring a trade union representative or workplace colleague to any meeting that is arranged in connection with the concern raised,

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as long as the union representative or work place colleague is not involved in the matter and the colleague agrees to maintain confidentiality.

If concerns are being raised by School Governor they should speak to the Chair of Governors in the first instance. If the Governor feels unable to raise the matter with the Chair, the Governor should contact the Head of Governor Services at the Schools HR Provider with the concern.

Employees who whistleblow are not expected to prove beyond doubt the truth of an allegation. However, whistleblowers will need to demonstrate to the person contacted that there are reasonable grounds for the concern to be raised and that it is in the public interest.

The school hopes that this policy gives employees the reassurance needed to raise concerns internally. However, it recognises that there may be circumstances where progressing through the internal route has failed, and the employee feels the they can only properly report the concern to external bodies who have responsibilities to monitor the school's compliance to its own standards and legal obligations. A list of these external bodies can be found at Appendix 1.

2.7 What happens once a concern has been raised?

The Local Authority will acknowledge receipt of concerns raised under this policy as soon as is practicably possible and within a maximum of 5 working days regardless of if the concern was submitted in writing or verbal communication.

The Headteacher, in liaison with the Local Authority and the Schools HR provider, will appoint an Investigation Officer to undertake a preliminary investigation to determine whether a full investigation is required, and to protect both the individual (s) accused and the discloser.

This appointed person, while maintaining the confidentiality of the complainant, will ensure that any individual who is the subject of the allegation is given details of the allegations in order to respond.

Once an employee has raised a concern, the person receiving the whistleblowing allegation will be responsible for ensuring that it is investigated properly. The nature of the investigation will depend upon the concern raised.

The person receiving the whistleblowing concern is responsible for ensuring the whistleblower receives feedback on progress, subject to any issues of confidentiality that may be necessary to guarantee a successful conclusion. It may not be possible to inform the whistleblower of the precise action undertaken where this would infringe a duty of confidence owed by the school to another party.

All concerns received will be investigated as speedily and sensitively as possible. The school may involve the Local Authority's Counter Fraud Team and the LADO (Local Authority Designated Officer/Safeguarding Services/Police/or appropriate external bodies).

Every effort will be made to minimise any difficulties that the whistleblower may experience as a result of raising a concern. For instance, if the formal investigation finds that malpractice/wrongdoing has occurred, the whistleblower may be required to give evidence at a disciplinary hearing or at court. In such circumstances the school will arrange for the whistleblower to receive advice and support throughout the process as appropriate e.g. through the EAP (Employee Assistance Programme) or their union

The school would endeavor to complete any investigations as soon as is practicably possible.

2.8 Outcome of investigation

If the investigation finds that misconduct and/or gross misconduct has occurred, disciplinary action may be initiated in accordance with the school's disciplinary policy and procedures.

In all cases the school will seek the most appropriate sanction against employees that it considers guilty of malpractice. This includes instigating disciplinary action, which may include dismissal, and, inconjunction with Counter Fraud and law enforcement agencies, instituting criminal proceedings.

The Whistleblower will be informed of the completion of the investigation. The nature of any action taken will remain confidential.

Where an investigation relates to abuse against either a vulnerable adult or a child at risk which has been substantiated and relates to a safeguarding concern, the school has a duty to make a referral to the DBS (Disclosure and Barring Service) and any other relevant professional body by informing Children's Social Care/Adults Social Care in conjunction with the LADO (Local Authority Designated Officer). Any referral will be approved by the Headteacher and Local Authority and submitted by Schools HR on behalf of the school. If on conclusion of the investigation the Whistleblower reasonably believes that the appropriate action has not been taken, they should raise their concerns in the first instance with the Director of Education. The employee who is dismissed, following an allegation under this policy and procedure will have the right of appeal against dismissal, as set out in the Council's Disciplinary Policy

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2.9 Anonymous– Confidential Disclosures

Employees are encouraged as individuals to put their name to any disclosures they make. Concerns/disclosures that are expressed anonymously are much less powerful and will be subject to a decision whether to investigate at the discretion of the Headteacher/Chair of Governors and Local Authority. However, there may be instances where there are duties relating to a serious safeguarding issue or a crime, then it would need to be referred.

In exercising this discretion, the factors for consideration will include the:

- seriousness of the concern.
- credibility of the concern.
- likelihood of confirming the concern raised satisfactorily.

If a Whistleblower requests to have their identity concealed, all possible steps will be taken to comply with the request. Any employee revealing the name of the whistleblower without their express permission may be subject to the school's disciplinary policy and procedures.

2.10 Malicious Disclosures

Employees, who victimise others for blowing the whistle or who knowingly make a malicious disclosure against another employee, may be disciplined under the school's disciplinary policy and procedure and this may involve consideration from the external agency/Police and the LADO (Local Authority Designated Officer).

2.11 Monitoring the Policy– who is responsible?

The Governing Body has overall responsibility for the policy. The Head Teacher is responsible for the operation of the policy within the school and the overall maintenance of a record of concerns raised in accordance with this policy and the outcomes.

The Local Authority is responsible for the operation of the policy and records outside the school.

All staff will be advised of this policy and where to access it.

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This policy was devised in consultation with the Trade Unions and will be reviewed similarly.

2.12 How the matter can be taken further (external procedures)

This policy is intended to provide employees with a process for raising whistleblowing concerns. If after exhausting the School's Whistleblowing Policy internally or if the employee feels unable to raise this internally, the whistleblower may take the matter further to the Local Authority's HR provider or if appropriate to external bodies– See Appendix 1.

2.13 Making allegations outside the procedure

An employee making an allegation, or passing on any allegation, by any means other than under this agreed school's procedure is strongly encouraged to seek the advice of their trade union representative and/or Schools HR

2.14 GDPR/Data Protection

When an individual makes a disclosure, the school will process any personal data collected in accordance with its data protection policy, which is GDPR compliant. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with disclosure.

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Appendix 1

List of External Bodies

The Public Interest Disclosure Act 1998 provides whistleblowers with the ability to contact specific organisations and enjoy the protection of the legislation.

The Public Interest Disclosure (Prescribed Persons) Order 2014 contains the list of prescribed persons: https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed- people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies

The list is not exhaustive; it identifies organisations that are most relevant to the school and local authority environment, and the matters that they deal with.

Organisation	Matters Dealt with
Following the Audit Commission's closure on 31 March 2015, disclosures relating to local authorities (including schools) can be made to the external auditor of the relevant authority or the Comptroller and Auditor General.	
Commissioners for Her Majesty's Revenue and Customs (HMRC) HMRC Fraud Hotline Cardiff CF14 5ZN Tel: 0800 788 887 Website: www.gov.uk/government/organisations/hm-revenue-customs/contact/reporting-tax-evasion	• the administration of UK taxes • the administration of national insurance and tax credits systems • customs and border-related functions • criminal investigations
The Director of the Serious Fraud Office The Director of the Serious Fraud Office 2-4 Cockspur Street London SW1Y 5BS Website: www.sfo.gov.uk/contact-us/reporting-serious-fraud-bribery-corruption	Contact them about serious or complex fraud, including bribery and corruption, in England, Wales or Northern Ireland and civil recovery of the proceeds of unlawful conduct.

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The Environment Agency National Customer Contact Centre PO Box 544 Rotherham S60 1BY Tel: 03708 506 506 Website: www.gov.uk/environment-agency	Acts or omissions which have an actual or potential effect on the environment or the management or regulation of the environment, including those relating to pollution, abstraction of water, flooding, the flow in rivers, inland fisheries and migratory salmon or trout.
The Food Standards Agency (FSA) Food Standards Agency Floors 6 and 7 Clive House 70 Petty France London SW1H 9EX Tel: 020 7276 8829 Email: helpline@food.gov.uk Website: www.food.gov.uk	Matters which may affect the health of any member of the public in relation to the consumption of food and other matters concerning the protection of the interests of consumers in relation to food.
The Health and Safety Executive Tel: 0300 003 1647 Online form: www.hse.gov.uk/contact/concerns.htm	Matters which may affect the health or safety of any individual at work; matters which may affect the health and safety of any member of the public, arising out of or in connection with the activities of people at work.
Homes and Communities Agency Arpley House 110 Birchwood Boulevard Birchwood Warrington WA3 7QH Tel: 0300 1234 500 Email: mail@homesandcommunities.co.uk	Contact them about the conduct of the business of registered providers of social housing in England.

The Information Commissioner The Information Commissioner's Office Wycliffe House Water Lane Wilmslow SK9 5AF Tel: 0303 123 1113 Email: casework@ico.org.uk Website: www.ico.org.uk	Compliance with the requirements of legislation relating to data protection and to freedom of information.
Care Quality Commission CQC National Customer Service Centre Citygate Gallowgate Newcastle upon Tyne NE1 4PA Tel: 03000616161 Website: www.cqc.org.uk	Contact them about matters relating to the provision of health and social care.
Public Concern at Work Tel: 020 7404 6609 Fax: 020 7403 8823 Email: whistle@pcaw.org.uk Website: www.pcaw.co.uk	Public Concern at Work is an independent authority on whistleblowing. They provide free help to prospective whistle blowers, advice on whistleblowing laws and help organisations create a culture where it is safe and accepted for staff to blow the whistle.
The Local Government Ombudsman Tel: 03000610614 Website: www.lgo.org.uk	Any concerns about maladministration
Children's Commissioner for England The Office of the Children's Commissioner Sanctuary Buildings 20 Great Smith Street London SW1P 3BT Tel: 020 7783 8330 Email: info.request@childrenscom	Contact them about matters relating to the rights, welfare and interests of children in England

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missioner.gov.uk Website: www.childrenscommissioner.gov.uk	
The Comptroller and Auditor General The Comptroller and Auditor General National Audit Office 157-197 Buckingham Palace Road London SW1W 9SP Tel: 020 7798 7999 Website: www.nao.org.uk/contact-us/whistleblowing-disclosures/	Contact them about the proper conduct of public business, value for money, fraud and corruption in relation to the provision of public services.
Disclosure and Barring Service Customer Services customerservices@dbs.gsi.gov.uk Telephone: 0870 909 0811 Minicom: 0870 909 0344	

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