

GORDON'S SCHOOL

WHISTLEBLOWING AND MANAGING ALLEGATIONS POLICY

*'The core principle that guides everything we do is **putting the interests of students first**'*

1. Introduction

Gordon's School has adopted this policy and the accompanying procedure on whistleblowing to enable you to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, a failure to comply with legal obligations, inappropriate behaviour or unethical conduct. The policy also provides, if necessary, for such concerns to be raised outside the organisation.

2. About this policy

Gordon's School is committed to conducting its business with honesty and integrity and expects all staff to maintain high standards in accordance with our Staff Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

3. Aims

Our policy on whistleblowing is intended to demonstrate that we:

- will not tolerate malpractice;
- encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that your concerns will be taken seriously and investigated, as appropriate;
- respect your confidentiality if you raise concerns and we will provide procedures to maintain your confidentiality so far as is consistent with progressing the issues effectively;
- will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- will only invoke the School's Disciplinary Procedure in the case of false, malicious, vexatious or frivolous allegations. The policy seeks to reassure you that you can raise genuine concerns without fear of reprisal, even if you turn out to be mistaken; and
- will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

4. Scope of the Policy

This procedure is separate from our adopted procedures regarding grievances. You should not use the whistleblowing procedure to raise concerns relating to your own personal circumstances, such as the way you have been treated at work. In those cases, the Grievance Procedure or Anti-Harassment and Bullying Policy should be used, as appropriate. If you are uncertain whether something is within the scope of this procedure, you should first seek advice from the HR Director.

This procedure has been implemented to enable you to express a legitimate concern regarding suspected malpractice within the School.

5. What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing, malpractice or dangers at work. 'Malpractice' is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of conduct, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment (negligence).

A **whistleblower** is a person who raises a genuine concern relating to suspected malpractice within the School. If you have any genuine concerns related to suspected malpractice affecting any of the School's activities (a whistleblowing concern), you should report it under this procedure.

If you feel unable to raise an issue with us or feel that their genuine concerns are not being addressed, you may report your concerns to other whistleblowing channels, such as:

- Protect, an independent whistleblowing charity (helpline: 020 3117 2502, email: whistle@protect-advice.org.uk , website: <https://protect-advice.org.uk/>).
- The NSPCC whistleblowing helpline (tel: 0800 028 0285 or email: help@nspcc.org.uk).

6. Confidentiality

We hope that you will feel able to voice whistleblowing concerns openly under this procedure. However, if you wish to raise a concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating the concern to know your identity, this will be discussed with you.

If there is evidence of criminal activity, the Police will be informed in all cases.

We do not encourage you to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should discuss this with the Head or HR Director and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are set out above.

7. How to Raise Concerns

We hope that in most cases you will be able to raise any concerns with your line manager. Concerns can be raised in person or in writing if preferred. It may be possible to agree a way of resolving your concern quickly and effectively. In some cases this may not be possible and the matter may need to be referred to the Head or HR Director.

However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you are at liberty to raise a whistleblowing concern with the Head or HR Director directly. If you feel unable to approach the Head or HR Director directly, then the Chair of Governors should be the first point of contact.

A meeting will be arranged with you as soon as possible to discuss your concern. You may bring a colleague or trade union representative to any meetings under this procedure. Any companion must respect the confidentiality of the disclosure and any subsequent investigation. You may be required to attend additional meetings in order to provide further information as the concerns raised are investigated.

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. You will be kept informed of the progress of the investigation and its likely timescale. Whenever possible and subject to third party rights, you will be informed of the resolution. However, sometimes the need for confidentiality may prevent us giving specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If you are not satisfied that your concern is being properly dealt with, you will have a right to raise it in confidence with the Governing Body. Alternatively, you can follow the external procedure below.

8. External Procedures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing within the School. In most cases you should not find it necessary to alert anyone externally.

However, if all internal procedures have been exhausted, you shall have a right of access to an external person/body. This may include (depending on the subject matter of the disclosure) HMRC,

the Audit Commission, the Health and Safety Executive and/or the Local Authority Designated Officer (where the disclosure relates to a child protection issue).

It will very rarely, if ever, be appropriate for you to alert the media.

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where you may be entitled to raise a concern directly with an external body where you reasonably believe:

- that exceptionally serious circumstances justify it;
- that we would conceal or destroy the relevant evidence;
- that you would be victimised by us; or
- where the Secretary of State has ordered it.

We strongly encourage you to seek advice before reporting a concern to anyone externally. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

9. Safeguarding concerns

If the concern involves a member of staff and a possible or potential child protection issue, you must inform the Head immediately. All other concerns about a child must be reported to the Designated Safeguarding Lead (DSL). Any action should follow the guidance in our Child Protection and Safeguarding Policy.

10. Malicious Accusations

False, malicious, vexatious or frivolous accusations will be dealt with under our Disciplinary Procedure.

11. Protection from Reprisal or Victimisation

It is understandable that staff are sometimes worried about possible repercussions as a result of raising a whistleblowing disclosure. We aim to encourage openness and will support you if you raise genuine concerns under this policy, even if you turn out to be mistaken.

You will not suffer a detriment or be disciplined for raising a genuine and legitimate concern, provided you do so in good faith and following the whistleblowing procedures. If you believe that you have suffered any such treatment, you should inform the Head or HR Director immediately. If the matter is not remedied, you may raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

12. Monitoring Arrangements

Confidential records will be kept of all matters raised through the Whistleblowing Policy and the Governing Body will receive reports with an assessment of the effectiveness of the policy and any emerging patterns.

13. Allegation Management

[Surrey's LADO procedure](#) will be followed where it is alleged that anyone working in the setting that provides education for children under 18 years of age, including supply staff, volunteers and contractors or another adult who works with children 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.

The last bullet point above includes behaviour that may have happened outside of the setting, that might make an individual unsuitable to work with children, this is known as transferable risk.

In dealing with allegations or concerns against an adult, staff must without delay:

Report any concerns to the Head Teacher immediately. If the concern is reported verbally then it must be followed up in writing.

If an allegation is made against the Head Teacher, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly.

There may be situations when the Head Teacher / Chair of Governors will want to involve the Police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

Once an allegation has been received by the Head Teacher / Chair of Governors they will contact the LADO (as part of their mandatory duty) on 0300123 1650 option 3 LADO or Email: LADO@surreycc.gov.uk immediately and before taking any action or investigation.

Following consultation with the LADO, and if threshold for a LADO referral has been met, a full written referral and risk assessment will be completed and sent to the LADO. Parents/carers will be informed of the allegation unless there is a good reason not to.

In liaison with the LADO, the setting will determine how to proceed and if necessary, the LADO will refer the matter to Social Care and/or the Police.

If the matter is investigated internally, the LADO will advise the setting to seek guidance in following procedures set out in part 4 of Keeping Children Safe in Education (KCSiE) (2025) and the SSCP procedures.

15. Low-level Concerns

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 setting 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 harm threshold or is otherwise not serious enough to consider a referral to the LADO.

The purpose of reporting low-level concerns is to create and embed a culture of openness, trust and transparency in which the setting’s values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

The setting creates an environment where staff are encouraged and feel confident to self-refer where they have found themselves in a situation.

Reports should be made to the DSL in a timely manner. If the DSL has any doubt as to whether the information which has been shared about the individual as a low-level concern in fact meets the harm threshold, they will consult with the LADO.

If a member of staff who raises a low-level concern does not wish to be named, then the School will respect their wishes as far as possible. However, staff should be aware that in certain circumstances this anonymity may need to be waived.

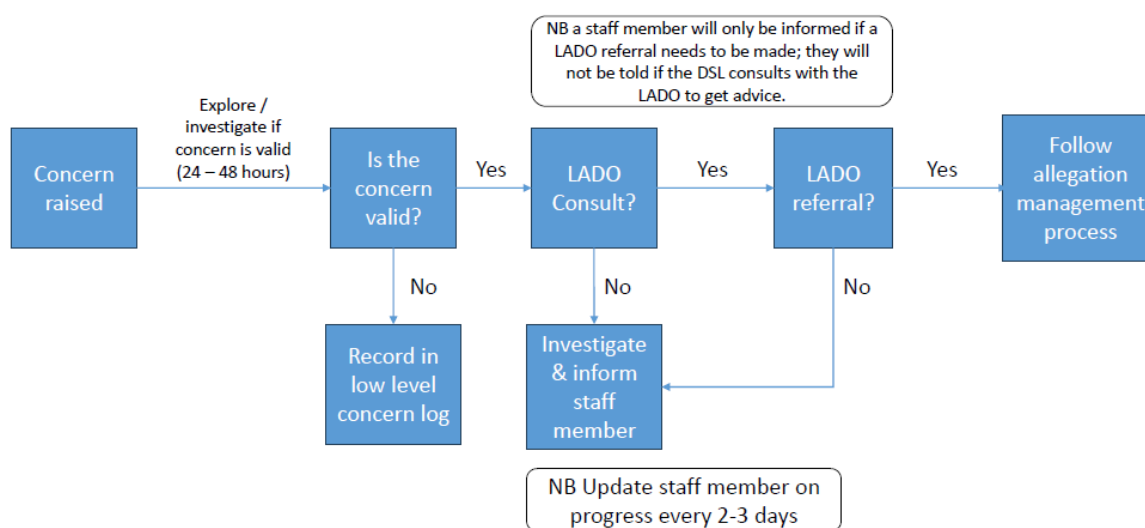
All low level concerns will be shared with the Safeguarding Group. A written record will be made of the concern and follow up action. This record will be kept securely and will only be accessed by the Safeguarding Group and the Safeguarding Governor and / or Chair of Governors as appropriate.

Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the School's Staff Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons, and staff are encouraged to self-report on the basis that:

- it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity
- it demonstrates awareness of the expected behavioural standards and self-awareness as to the member of staff's own actions or how they could be perceived; and
- crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour

Some low-level concerns may also raise issues of misconduct or poor performance. The Head Teacher will consider whether this is the case – by referring to the School's disciplinary and/or capability procedure and taking advice from the HR Director.

Low Level Concern Process



16. Associated Policies

This Policy operates in conjunction with the following:

- Staff Code of Conduct
- Child Protection and Safeguarding Policy
- Positive Handling Policy
- Searching Students Policy
- Disciplinary Procedure
- Capability Procedure

- Grievance Procedure
- Data Protection Policy

Clair Gill
Designated Safeguarding Lead

Reviewed: September 2025