

Rose Education Provision



Whistleblowing Policy

August 2025

Introduction

All employers are recommended to develop a clear and accessible Whistleblowing Policy under the Public Interest Disclosure Act 1998.

'Whistleblowing' has been described as "providing a safe alternative to silence" (Public Concern at Work). It is the mechanism for staff to voice their concerns without fear of repercussion, even if the concern later proves to be unfounded. When a concern is raised via this route, this is known as making a 'disclosure'. It is this disclosure of information which relates to and raising of legitimate concerns about specified matters or "qualifying disclosures" of suspected wrong doing or dangers at work.

Qualifying disclosures may include:

- Criminal activity
- Miscarriages of Justice
- Dangerous breaches of health and safety
- Damage to the environment
- Failure to comply with any legal or professional obligations and or regulatory requirements
- Bribery
- Financial fraud or mismanagement
- Allowing breaches of other unethical behaviour or concealments of any of the above

This Whistleblowing Policy explains how to raise a concern and outlines the protection and support available to staff. The existence of this Policy does not in any way lessen the school's commitment to promoting a general climate of openness and co-operation where there is opportunity for discussion about difficulties, concerns and problems with management. Rather it is in place for occasions when a member of staff feels unable to raise a concern through this route, or when this would not be appropriate.

This Policy covers and protects employees, agency workers, trainees and contractors' staff.

Whistleblowing generally involves a concern about a danger or illegality that affects others, such as members of the public or the employer. Although on occasion there may be some overlap between a whistleblowing concern and a grievance, for example, a health and safety matter where the risk affects you and others, concerns about a situation affecting you personally should generally be raised via the Grievance Procedure.

Types of Disclosures

Although this is not an exhaustive list, whistle-blowing disclosures tend to involve one or more of the following:

- Deficiencies in the care, or abuse, of children or young people;
- A criminal act that has been, is being, or is likely to be committed, including damage to the environment, unauthorised use of public funds and possible fraud and/or corruption;
- Someone has failed, is failing, or is likely to fail, to comply with legal obligations;
- Health and safety risks, including risks to the public, children/young people and other employees;
- Inappropriate or improper conduct;
- Serious failure to comply with appropriate professional standards;
- Breach of local procedures or statutory codes of practice;
- Other unethical conduct.

Reasons for Whistleblowing:

- We all have an individual responsibility for raising concerns about unacceptable practice or behaviour;

- We could prevent the problem worsening or widening;
- We may be able to protect or reduce risks to others;
- To prevent becoming implicated yourself.

What stops people from Whistleblowing?

- Starting a chain of events which spirals;
- Disrupting the work;
- Fear of getting it wrong;
- Fear of repercussions or damaging careers;
- Fear of not being believed.

How to raise a concern

- As a member of staff you are recommended to approach your Union/Professional Association for advice and support, which may include inviting them to raise the concern on your behalf.
- Approach your head of school, or the school's designated Safeguarding Lead (if the concern is child protection related). If you would feel more comfortable you can ask to meet with them away from the school premises. They will consider whether the issue can be resolved informally.
- You should be making the disclosure in good faith. The Public Interest Disclosure Act 1998 defines 'good faith' in the context of Whistleblowing as "the reasonable belief that the allegation is substantially true and that it is not made for personal gain".
- Voice your concerns, suspicions or uneasiness as soon as you can: the earlier a concern is expressed the easier and sooner action can be taken. Try to pinpoint exactly what practice is concerning you and why.
- Put your concerns in writing (using the form provided at [Appendix 2](#)), outlining the background and history, giving names, dates and places.
- If your concern is about your head of school or you feel you need to formally raise it with someone outside the school, contact LADO (Local Authority Designated Officer) **0116 454 2440**
- If you feel you need to take your concern to a Regulatory body (for example, Ofsted), or to a relevant external organisation/individual (including an elected member/Member of Parliament), please see the contact details at [Appendix 3](#). The conditions for making a disclosure to a Regulatory Body/External Organisation are:
 - You reasonably believe you would suffer detriment if you made the disclosure to the Head of school
 - You reasonably believe the evidence is likely to be concealed or destroyed;
or
 - You have already made the disclosure to the Head of School and you are dissatisfied with the response.
- You are not expected to prove the truth of an allegation but will need to demonstrate sufficient grounds for the concern.
- You may invite your Union/Professional Association representative or a work colleague to be present during any meetings/interviews in connection with the concerns you have raised. Should your Union/Professional Association representative raise the concern on your behalf, they will be automatically afforded the same protection from detriment (see "How are you protected?")
- As far as is within your control, make sure you get a satisfactory response - don't let matters rest.
- Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that already affect you.

- **Be aware that malicious or vexatious allegations may be considered as a disciplinary offence.** The Concise Oxford Dictionary (Tenth Edition) defines ‘malicious’ as “characterised by malice; intending to do harm” and ‘vexatious’ as “Law (of an action) brought without sufficient grounds for winning, purely to cause annoyance to the defendant”. Such allegations can cause serious difficulties for innocent individuals. The Public Interest Disclosure Act 1998 does not exclude the possibility of workers being sued by individuals for defamation in connection with any disclosures they make.

This process is summarised as a Flowchart at [Appendix 1](#).

What happens next?

- Preliminary inquiries may be made to help decide how best to respond in the public interest. Depending on the nature of the issue raised, the response may be one or more of the following:
 - management investigation;
 - internal audit investigation;
 - disciplinary investigation;
 - referral to the police;
 - an independent investigation;
 - amend procedures;
 - no action due to lack of sufficient evidence.
- You should be given information on how the matter is likely to be dealt with within 10 working days of making the disclosure (so far as legally possible and subject to rights of confidentiality).
- You will be informed of the outcome of the investigation and any action that has been taken to resolve the matter (so far as legally possible and subject to rights of confidentiality).
- If you are dissatisfied with the response, you may take the matter further with the Chair of Governors or the persons/organisations identified at [Appendix 3](#).

How are you protected?

- The Head of School as your employer, has a responsibility to protect you from any detriment as a result of making a disclosure in good faith, particularly from disciplinary action, dismissal, harassment or victimisation. Fulfilling that responsibility includes treating the disclosure confidentially, one aspect of which may involve protecting your identity. Any victimisation or harassment either in an attempt to deter an individual from making a disclosure, or following a disclosure, will be considered gross misconduct and may lead to dismissal.
- No disciplinary action will be taken against you if the concern proves to be unfounded and was raised in good faith.
- If you want your identity to remain confidential, this will be observed as far as possible. Should it not be possible to resolve a concern without revealing your identity (for example, because your evidence is needed in court or in a subsequent internal disciplinary hearing), a discussion will be held with you about whether the matter should be taken forward and, if so, how this will be done and how best to protect your interests.
- Anonymous disclosures will be considered to the extent that it is reasonable and practicable to do so, although the need to confirm or follow up evidence may make this difficult.
- The decision to Whistleblow can be difficult and stressful: advice and support is available from your line manager/Principal and/or your Union/Professional Association. In addition, support is available from the Local Authority’s Counselling Service Provider.
- It is your right to remain in your current post. Your employer, the Governing Body will work with the management team to make every possible effort to ensure that this takes place.

If you feel unable to remain in your role during the investigation, every effort will be made to transfer you to an appropriate alternative.

Where can I go for further advice?

Your Union/Professional Association. In addition, the independent charity Public Concern at Work (PCaW) provides advice to individuals on whistleblowing in the public interest on a strictly confidential basis (www.pcaw.co.uk / 0207 4046609).

Author:	Miss Sheree Curtis (Head of School)		
Date:	August 2025		
Signed:	S. Curtis	Review Date:	August 2026

APPENDIX 1 - THE WHISTLEBLOWING PROCESS

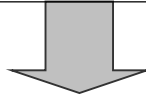
Stage 1- Making a disclosure

Approach your Head of School. You can do this verbally or in writing.

- If the disclosure is about the Head of School contact LADO (Local Authority Designated Officer) **0116 454 2440**

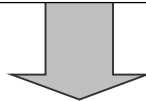
You will be asked to make a written or verbal statement. In such cases, a brief summary of the interview will be made and agreed by both parties.

Please see the Whistleblowing Policy for details of further contacts should you feel unable to discuss your concerns with the above parties (or feel that the response from these parties is insufficient).



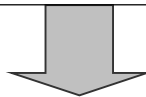
Stage 2 – Initial Response to the Disclosure

Consideration will be given as to what action will be taken as a result of the disclosure. You will be notified of the intended response and the reasons for it.



Stage 3 – Launch a Management Investigation

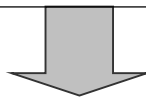
Where an Investigation is deemed necessary, a senior manager will be appointed as an investigating officer.



Stage 4 – Deciding whether further action is necessary

On the strength of the information provided by the investigation, further action may be necessary:

- If there is a case to be answered by any individual, the recognised procedure will be followed;
- Where there is no case to answer, but the concern was raised in good faith and in accordance with the Whistleblowing policy, the school will ensure as far as is reasonably practicable that you suffer no reprisals or victimisation;
- Where it is established that the allegations were malicious/vexatious or you have not acted in accordance with the Whistleblowing policy, disciplinary action may be taken.



Stage 5 - Confirmation of the Outcome

You will be informed of the outcome of the investigation and any appropriate action taken to resolve the matter, subject to any confidentiality clause and/or legal constraints. If you are dissatisfied with this response you may take the matter further with the prescribed persons or organisations identified in the Whistleblowing Policy.

APPENDIX 2 - WHISTLE BLOWING POLICY - REPORTING FORM

Referral Form to be completed by Individual identifying a concern under the Public Interest Disclosure Act 1998

DETAILS OF PERSON RAISING CONCERNS AND ISSUE RAISED

Nature of Concern:

Background (please provide dates where possible) :

Who is involved?

Reasons for the concern:

Name :

Date (dd/mm/yy) : / /

Contact No.

Time (mm:hh) : :

Meeting Date (dd/mm/yy): / / Time (mm:hh): :

INVESTIGATION OF CONCERN

Concern Received By:	:
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Action :

Signature:..... Time: (mm:hh): :

Signature:.....

Time: (mm:hh):

ADDITIONAL INFORMATION

Comments/Additional information:

APPENDIX 3 - LIST OF PRESCRIBED PERSONS FOR EXTERNAL PUBLIC INTEREST DISCLOSURES

The Local Authority Designated Officer (LADO) in Leicestershire is responsible for managing allegations against individuals who work with children. If you have concerns about an adult working with children, you can contact the LADO at 0116 454 2440 or email Lado-allegations-referrals@leicester.gov.uk. The LADO service responds to allegations against staff and volunteers, ensuring that appropriate actions are taken. For more information about the LADO's role and responsibilities, you can visit the Leicestershire County Council website. If you need immediate assistance, you can also contact the Children's Duty Team at 01572 758

Ofsted

Can deal with referrals re: concerns about any service for children and young people.

Piccadilly Gate
Store Street
Manchester
M1 2WD

Tel: 0300 123 4666
Email: CIE@ofsted.gov.uk

Charity Commissioners for England and Wales

Can deal with referrals re: the proper administration of charities, or funds given or held for charitable purposes.

Head of Operations
Harmsworth House
13-15 Bouverie Street
London
EC4Y 8DP

Tel: 0300 066 9197

Her Majesty's Commissioners of Customs and Excise

Can deal with referrals re: Value Added Tax, insurance premium tax, excise duties and landfill tax. The import and export of prohibited or restricted goods.

HM Customs and Excise
Crown House
Birch Street
Wolverhampton
WV1 4JX

Tel: 0300 200 3700

The Certification Officer

Can deal with referrals re: fraud, and other irregularities relating to the financial affairs of trade unions and employers' associations.

Certification Office
Lower Ground Floor
Fleetbank House
2-6 Salisbury Square
London
EC4Y 8JX

Tel: 0330 109 3602
Email: info@certoffice.org

Her Majesty's Commissioners of the Inland Revenue

Can deal with referrals re: Income Tax, Corporation Tax, Capital Gains Tax, Petroleum Revenue Tax, Inheritance Tax, Stamp Duties, National Insurance Contributions, Statutory Maternity Pay, Statutory Sick Pay, Tax Credits, Child Benefits, Collection of Student Loans and the enforcement of the National Minimum Wage.

Howard House
Castle Meadow Rd
Nottingham
NG2 1AB

Tel: 0115 974 1000

Comptroller and Auditor General of the National Audit Office

Can deal with referrals re: the proper conduct of public business, value for money, fraud and corruption in relation to the provision of centrally funded public services

The Comptroller and Auditor
General National Audit Office
157-197 Buckingham Palace Road
Victoria
London
SW1W 9SP

Tel: 020 7798 7999

Director General of Electricity Supply

Can deal with referrals re: the generation, transmission, distribution and supply of electricity and activities ancillary to these matters

Office of Electricity Regulation
5th Floor
11 Belgrave Rd
London
SW1V 1RB

Tel: 020 7630 2200

Director General of Gas Supply

Deals with referrals re: the transportation, shipping and supply of gas through pipes and activities ancillary to these matters.

Office of Gas Supply
9 Millbank
London
SW1P 3GE

Tel: 020 7901 7000

Director General of Telecommunications

Can deal with referrals re: provision/use of telecommunication systems/services & apparatus.

Office of Telecommunications
Baldock Radio Station
Royston Road
Baldock
SG7 6SH

Tel: 01462 428500

Director General of Water Services

Can deal with referrals re: the supply of water and the provision of sewerage services.

Office of Water Services Centre
Centre City Tower
7 Hill Street
Birmingham
B5 4UA

Tel: 0121 644 7500

Serious Fraud Office

Can deal with referrals re: serious or complex fraud.

The Director of the Serious Fraud Office
2-4 Cockspur Street
London
SW1Y 5BS

Tel: 020 7239 7272

The Environment Agency

Can deal with referrals re: acts/omissions which have an actual or potential effect on the environment or the management or regulation of the environment, including pollution, abstraction of water, flooding, the flow of rivers, inland fisheries and migratory salmon or trout.

National Customer Contact Centre
PO Box 544
Rotherham
S60 1BY

Tel: 0800 807060 (24 hour line)

Food Standards Agency

Can deal with referrals re: 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

Personnel and Establishments Division
Food Standards Agency
2C Aviation House
125 Kingsway
London
WC2B 6NH

Tel: 020 7276 8787

Financial Conduct Authority (FCA)

Can deal with referrals re: matters concerning the sale of goods or the supply of services, which adversely affect the interests of consumers or competition affecting markets in the UK, the carrying on of investment or insurance business, the operation of: banks and building societies, deposit-taking businesses, wholesale money market regimes, friendly societies, benevolent societies, working men's clubs, specially authorised societies and industrial and provident societies, the functioning of financial markets, investment exchanges and clearing houses. Money laundering, financial crime, and other serious financial misconduct in connection with activities regulated by the FCA.

FCA Head Office
12 Endeavour Square
London
E20 1JN

Tel: 0800 111 6768

Health and Care Professions Council (HCPC)

Can deal with referrals re: matters relating to the registration of social care workers under the Care Standards Act 2000.

Park House
184 Kennington Park Road
London
SE11 4BU

Tel: 0300 500 6184

Website: www.hcpc-uk.org

Health and Safety Executive (HSE)

Can deal with referrals re: 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 persons at work

Health and Safety Executive
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS

Tel: 0300 003 1647
Website: www.hse.gov.uk

Housing Corporation

Can deal with referrals re: registration and operation of registered social landlords, including their administration of public and private funds and management of their housing stock.

The Enquiries and Complaints Team
Housing Corporation
1 Park Lane
Leeds
LS3 1EP

Tel: 0845 230 7000
Email: enquiries@housingcorp.gsx.gov.uk
Website: www.housingcorp.gov.uk

Information Commissioner

Can deal with referrals re: compliance with the requirements of legislation relating to data protection and freedom of information*

(*Data protection legislation regulates the processing of information relating to individuals, including the obtaining, holding, use or disclosure of such information)

(*Freedom of information legislation provides for the disclosure by public authorities of the information that they hold)

The Office of the Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113
Website: <https://ico.org.uk>

Leicestershire Constabulary

Can deal with referrals re: information about any crime.

Force Headquarters
St Johns
Enderby
Leicester
LE19 2BX

Tel: 0116 222 2222

Care Quality Commission

Can deal with referrals re: matters relating to the provision of regulated care services, as defined in the Care Standards Act 2000

Care Quality Commission
151 Buckingham Palace Road
London
SW1W 9SZ

Tel: 03000 616161
Website: <https://cqc.org.uk>