Whistleblowing Policy

PACT HR Adopted

Date of review:	October 2026
Approved by Committee:	Full Governing Body
Date of Approval:	8 October 2026
Date of next review:	October 2027

Whistleblowing Policy

Version 2: 1 November 2025

Titus Salt School

Policy Details

Titus Salt School has adopted the PACT HR recommended model procedure as consulted upon and agreed by the following Trade Unions:

- ASCL*
- GMB
- NAHT`
- NASUWT
- NEU
- UNISON

* *ASCL recognises and agrees the consultation process for this policy*

Board of Trustees / Governing Body Approval

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Approved by: Full Governing Body

Approved on: Please enter date approved

Date of Implementation: 07/10/2026

Reviewer: Full Governing Body

To be reviewed on: 01/10/2027

NB. This policy/guidance will be retained for a period of 7 years from replacement.

Summary of Key Changes

1. Reference to publication for statutory instruments updated.

2. Signposting for local arrangements updated.

3. Extension of types of public disclosures which can be reported under the Whistle-blowing Policy.

4. Reference to financial management updated to ensure policy is relevant to Multi Academy Trusts and Academies.

5. Reference to Committee/School Governing Bodies has been extended to incorporate Multi Academy Trusts and Academies.

6. Policy and Procedure Sections have been separated and sub-titled for ease of application.

7. Reference to PACT HR Policy Equality Impact Assessment has been added

8. Appendices 1 to 3 are also available separately on PACT HR's website.

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1. Policy Statement

1.1 Introduction

The reporting of workplace concerns is often referred to as ‘whistleblowing’ or ‘making a disclosure in the public interest.’

Titus Sal School takes its responsibilities seriously. This includes:

- Ensuring good governance
- Using public money and resources properly
- Promoting openness, integrity, and accountability

If a worker has a concern that falls under this policy, they are encouraged to report it to Senior management or the Chair of [Insert School/Academy/Trust Name], as appropriate.

The Chair of Governors / Board of Trustees (the Responsible Officer) is responsible for making sure this policy is followed.

The Governing Body takes seriously its responsibilities for good governance, the appropriate and efficient use of public money and resources and is committed to the highest possible standards of openness, integrity and accountability. Where any worker has a concern that might fall within the scope of this document, they are encouraged to report the matter to the senior management or the Chair of Governors, as appropriate.

The Chair of Governors / Board of Trustees (‘Responsible Officer’) has overall responsibility for the implementation of this policy.

- Are employed by the School/Academy/Trust
- Provide personal services under a contract (where the school is not a client or customer)
- Are on a work experience or training placement

This policy is designed to:

- Help workers raise serious concerns
- Explain how to make a disclosure under the Public Interest Disclosure Act 1998
- Allow concerns to be raised confidentially
- Protect workers from victimisation, discrimination, or disadvantage

1.2 Equality Impact Assessment

We recommend that the School undertakes an Equality Impact Assessment on the implementation of this Policy to determine whether some groups are affected differently to others. The intended outcome of an Equality Impact Assessment is that it will reduce likelihood that of discrimination and that, where possible, it promotes equality and fairness. Please refer to the PACT HR Website for more information.

2. Whistle Blowing Procedure

2.1 Introduction

This Whistle Blowing Procedure aims to:

- Encourage employees to feel confident in raising serious concerns of illegal or improper conduct, and to question and act upon concerns about practice.
- Provide employees with a mechanism to raise those concerns and to be told of any action taken to address concerns.
- Ensure that employees have received a response to their concerns and that they are aware of how to pursue these if they feel that the internal processes have not been successful.
- Reassure employees that they will be protected from possible reprisal or victimisation if they have a reasonable belief that they have made any disclosure in good faith.

Employees should report anything that:

- makes them feel uncomfortable in terms of known standards, their experience or the standards they believe the School subscribes to
- is against the school's policies and procedures
- falls below established standards of practice, or amounts to improper conduct
- **Points A and B** below must be followed if disclosed information suggests that any member of staff has;
    - behaved in a way that has harmed, or may have harmed a child
    - possibly committed a criminal offence against children, or related to a child
    - behaved towards a child or children in a way that indicates s/he is unsuitable to work with children

Point A: The guidance contained in the Department for Education Publication Working together to safeguard children 2023: statutory guidance, Safer Recruitment in Education and Dealing with allegations of abuse against teachers and other staff, will be followed because of the specific obligations upon persons reporting concerns regarding the wellbeing of children and young people.

Point B: The local arrangements for reporting such concerns can be found on the website of the Safeguarding Children Board at Welcome to the West Yorkshire Consortium Inter Agency. Or Bradford District Safeguarding Children Partnership Consortium.

There is an expectation that concerns that fit one or more of the above criteria are reported within 24 hours. However, this does not prevent concerns being raised outside of this timeframe.The website referred to above, gives guidance and identifies who is the Senior Manager from each agency who can advise on each step of the process. These

procedures are commonly referred to as the ‘LADO’ (Local Authority Designated Officer) procedures.

2.2 Concerns not covered under a Whistleblowing Policy

This policy is not intended to deal with complaints relating to a person’s own personal circumstances as an employee; such as, matters relating to their own terms and conditions, the way they have been treated at work, or about personal differences or conflicts. In these cases, these should be referred to the School's Complaints and Grievance Procedure. Furthermore, the policy does not cover any complaints about any third party organisation or about another member of the public.

2.3 Qualifying Disclosures

The law provides protection for workers who raise legitimate concerns about specified matters or "qualifying disclosures".

A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that one of the following is being, has been or is likely to be committed:

- Any form of abuse to pupils
- Criminal offence
- Miscarriage of justice
- Risk to health and safety
- Damage to the environment
- Unauthorised use of public funds
- An act of fraud or corruption
- Failure to comply with professional and or regulatory requirements
- Negligence
- Breach of the school’s / academy’s or trusts policies, procedures or standards
- Unethical behaviour
- Unauthorised disclosure of confidential information
- A breach of any other legal obligation or concealment of any of the above

2.4 Protected Disclosures

Titus Salt School is committed to high standards and supporting its workers. If a worker shares information because they reasonably believe it’s in the public interest, it will be treated as a protected disclosure.

No worker will be penalised for raising a concern in good faith. Workers are protected from any negative treatment or deliberate exclusion by others because they’ve made a protected disclosure.

The School recognises that staff may want advice or support from a trade union representative when raising a concern. Trade union representatives who give advice or raise concerns on behalf of a member will also be protected from unfair treatment.

Harassment, victimisation, or informal pressure against anyone who raises a concern will not be tolerated. The school will take action to protect staff who speak up in the public interest.

However, if a concern is raised without reasonable belief, and is found to be frivolous, malicious, or made for personal gain, the worker may face disciplinary action.

2.5 Support and Protection for workers who raise a concern

Appropriate assistance or advice should be offered during the meeting, including a type of support the staff member may require. Appropriate health and well-being / counselling services should be considered

2.6 Confidentiality and Anonymous allegations

A concern reported under this policy will be treated confidentially. Unless the worker agrees, their identity will not be disclosed in dealing with their concern. However, workers are encouraged to put their name to allegations whenever possible. Completion of an anonymous referral may not automatically result in the commencement of the formal complaints process. However, if the submission includes identifying information such as someone's name, and the School/Academy/Trust; this will assist in the School/Academy/Trust can take appropriate action.

In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised.
- The credibility of the concern.
- The likelihood of confirming the allegation from attributable sources.

In the event of a concern disclosing alleged criminal activity, the worker may be asked to help the police or other appropriate enforcement agency. In the event of disciplinary action taken the worker may be asked to give evidence under the school's disciplinary procedure.

2.7 Untrue Allegations

If a worker reasonably believes that the claim was made in the public interest, but the claim is not confirmed following investigation, no action will be taken against the worker. However, maliciously making a false allegation is a disciplinary offence. If a claim is made frivolously, maliciously or for personal gain, then disciplinary action may be taken against the worker in the absence of any reasonable belief.

2.8 Who to Raise a Concern To

Internal Disclosures

Workers are encouraged to report any concerns they may have about any aspect of the working environment, the conduct of its staff, the governors or trustees, or any other member of staff acting on behalf of the School.

- In the first instance, the concerns should be reported to the Headteacher / Head of School / Executive Leader as applicable.

- If the concerns are in relation to the Head of School / Headteacher / Executive Headteacher then the concerns should be reported to the Chair of the Governing Body in a maintained school setting.

- In an Academy / MAT setting, if the concerns relate to the Executive Headteacher or Executive Leader, then they should be reported to the Chief Executive Officer.

- If the concerns relate to the Chief Executive Officer, they should be reported to the Chair of the Board of Trustees or as directed to do so in line with the School's Roles and Responsibility / Governance Matix.

- For Maintained Schools, any concerns regarding Members of the Governing Body, should be made as per the roles and contact details outlined in Appendix 1.

- For Standalone and MAT settings, for concerns relating to the Board of Trustees, these should be raised to the relevant Regional Schools Commissioner.

External Disclosures

Alternatively, workers may also decide that they wish to raise their concerns to prescribed persons or bodies identified by the Government within the Education Sector. All contact information for these prescribed persons or bodies is available on gov.uk website **here**

As the statutory protections for whistle-blowers only apply in certain prescribed circumstances, workers are strongly encouraged to seek advice before making an external disclosure.

If an external disclosure is made to an external body or agency, there may be a requirement for the worker to demonstrate why they thought the internal school procedure was not appropriate. As an employee of the school, disclosing concerns externally, even in good faith, without first attempting to report internally, may result in a review under the School/ Academy/ Trust disciplinary procedure.

2.9 Confidential Information

Workers must not share personal, sensitive, or confidential information with anyone who is not authorised to receive it. If you do, it could lead to disciplinary action.

If a concern is raised and leads to false information being published that harms someone's reputation, there is a risk of legal action for defamation. However, if the concern is raised in good faith and in the public interest, legal protection called "qualified privilege" may apply. This protection does not cover deliberately false statements.

If you're not in a trade union and want confidential advice before making a disclosure, you can contact the charity Protect:

Advice Line | Protect - Speak up stop harm 020 3117 2520

2.10 How to raise a concern

Workers may wish to consider discussing their concern with a colleague or trade union representative before making a disclosure and may find it easier to raise the matter if there are two (or more) who have had the same experience or concerns. However, they should each make a separate and individual disclosure and should then not discuss the matter further between themselves.

Workers have the right to invite a trade union representative, or a work colleague, to be present during any meetings or interviews in connection with the concerns that they have raised.

You can raise a concern verbally or in writing (writing is preferred). If writing, include:

- Background and history of the issue (with dates if possible)
- Why you're concerned
- Why you believe it's in the public interest to report it
- You may want to speak with a colleague or trade union representative before raising a concern. If others share your concern, each person should make their own individual report and not discuss the matter further among themselves.
  Written concerns should be addressed insert named contact details in line with section 2.8 above.

You have the right to bring a trade union representative or a colleague to any meetings or interviews related to your concern.

2.11 Responding to Concerns

When a concern is raised under this policy and referred to the Headteacher, CEO, or Chair of Governors/Trustees, they may seek advice relevant HR or legal advice. The concern may then be:

- Investigated by management, internal audit, or through the disciplinary process
- Referred to the police
- Referred to an external auditor
- Subject to an independent inquiry
- Investigated by an independent officer appointed by the school
- If the concern is raised with someone else, appropriate steps will be taken to ensure it's handled efficiently. This may include using one of the methods above or another suitable approach.

Initial Steps

To protect everyone involved, the school will first decide whether an investigation is needed and what form it should take. If the concern relates to specific issues (e.g. child protection or discrimination), it will be handled under the relevant procedures.

Some concerns may be resolved quickly without a full investigation. If urgent action is needed, it will be taken immediately.

The person handling the concern may ask to meet with the person who raised it to clarify details. A trade union representative or colleague may attend this meeting.

Response Timeline

Within 10 working days (excluding school holidays), the person handling the concern will write to the complainant to:

- Confirm the concern has been received
- Explain how it will be handled
- Give an estimated timeline for a final response
- Say whether initial enquiries have been made
- Confirm if further investigation will happen, and if not, explain why
- If full details aren't available yet, they will share as much information as possible.

Further Contact and Support

The level of contact will depend on the nature of the concern and how clear the information is. The school may ask for more details if needed.

In some cases, the concern may need to be reported to the relevant local authority's Internal Audit or the Local Authority Monitoring Officer.

If the concern involves harm to children, young people, or vulnerable individuals, it will be investigated by someone with the right experience and independence. It may also be reported to the Local Authority Designated Officer (LADO).

The School will support complainants throughout the process. If they need to give evidence in disciplinary or criminal proceedings, advice will be provided.

Outcome

The School understands that complainants want reassurance that their concern has been properly addressed. Subject to legal and data protection rules, they will be informed of the outcome of any investigation.

Please note: Details about any disciplinary action taken against another employee will not be shared.

2.12 How the matter can be taken further

This policy is intended to provide workers with a way to raise concerns internally. The School hopes staff will be satisfied with any action taken. If they are not, and feel they wish to raise the matter externally, the following are possible contact points:

- The school's external auditor
- The Audit Commission (confidential reporting for suspected fraud)
- Your trade union
- Your local Citizens Advice
- Relevant professional bodies or regulatory organisations
- A relevant voluntary organisation
- Prescribed persons or bodies
- The police

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Appendix 1: List of Contacts

Titus Salt School

Persons who may be contacted for advice on making a confidential complaint

Local Authority	City of Bradford Metropolitan District Council

Details Correct	01/11/2025

Area	**Name**	**Email**	**Contact Number**
Chief Executive	Dr Lorraine O'Donnell	Aleena.Gul@bradford.gov.uk	01274 432002
Strategic Director, Children's Services	Richard Crane (Interim)	Richard.Crane@bradford.gov.uk	01274 431078
Strategic Director, Adults Social Care, Health & Housing	Iain Macbeath	Iain.Macbeath@bradford.gov.uk	01274 432900
Strategic Director, Place	David Shepherd	David.Shepherd@bradford.gov.uk	01274 432111
Strategic Director, Corporate Resources, Finance & IT	Steven Mair	Steven.Mair@bradford.gov.uk	01274 432111
Director of Public Health	Craig Blundred	Craig.Blundred@bradford.gov.uk	01274 432410
Director of Human Resources	Claire Gierth (Interim)	Claire.Gierth@bradford.gov.uk	01274 437335
Director of Legal & Governance	Jason Field	Jason.Field@bradford.gov.uk	01274 432496
Corporate Fraud Unit		reportfraud@bradford.gov.uk	01274 437511
Reporting Benefit Fraud		reportfraud@bradford.gov.uk	01274 437511

External Bodies

Titus Salt School encourages staff to raise their concerns internally, in line with the School's Whistle-blowing Policy. For staff who wish to report their concerns outside of their school's local authority or for staff who are employed by MATs or Academies, a list of relevant external bodies to whom staff can raise concerns with is included **here.**

Appendix 2 Template Form for Whistleblowing

Making a public interest disclosure (Whistleblowing)
This form is intended for use by any individual working for the School (including contractors, agency workers and volunteers) who wish to raise an issue about alleged wrongdoing. This form should be used to report wrongdoing within the School (for example, financial irregularities or health and safety concerns), rather than to raise a personal grievance (for example, if you would like to make an allegation of bullying or harassment or are complaining that your contract of employment has been breached). If you are unsure about whether your concerns are best dealt with under the whistleblowing policy or grievance policy, please read the above policies for guidance. If, having read the whistleblowing policy, you remain unsure about which procedure to use, please consult your School Business Manager for further advice. Once you have submitted this form, the School's Whistleblowing policy will be invoked. This may result in an investigation, which will not involve anyone (for example, your line manager) you may have implicated below. In certain circumstances, you can request that your concerns be kept anonymous. Where possible, school will respect a request for anonymity but cannot guarantee that it will be able to do so. This form should be completed and delivered to your Headteacher (or appropriate persons as listed in Section 1 of the Whistleblowing Policy) in an envelope marked "confidential" or sent as an email attachment with "confidential" in the subject line.

Formal public interest disclosure (whistleblowing)	
Employee's name:	
Employee's job title:	
Employee's department / School/Academy/Trust	
Date:	

Does your public interest disclosure relate to your Line Manager?	Yes/No

Summary of disclosure:
Please set out the details of the issue that you wish to raise, providing examples where possible, particularly dates, times, locations and the identities of those involved. You may attach additional sheets if required.
Individuals involved:
Please provide the names and contact details of any people involved in your concerns, including witnesses.
Outcome requested:
Please set out how you would like to see the issue dealt with, and why and how you believe that this will resolve the issue.
Declaration:
I confirm that the above statements are true to the best of my knowledge, information and belief. I understand that, if I knowingly make false allegations, this may result in the organisation taking disciplinary action against me.

Form completed by:	
Signature:	
For completion by the school:	
Date form received by the school:	
Name of recipient and job role:	
Signature:	

Appendix 3: Equality Impact Assessment

A Microsoft Word version for completion is available on the PACT HR Website: SLA Client Information Hub.

Introduction
All Schools, Academies and Trusts need to ensure that all strategies, policies, service and functions, both current and proposed have considered equality, diversity and inclusion. Below is a recommended Equality Impact Assessment (EIA) Form for use in conjunction with PACT HR Policies. For further advice regarding the completion of this form, please contact your named PACT HR Business Partner.

Assessment

School Name:	
Policy Name:	
Name of staff member conducting assessment:	
Date of assessment:	
Reason for assessment: (what are you aiming to do?)	

Main Stakeholders/Beneficiaries: (e.g., Staff; Pupils; Governors; Trustees)

Will the proposed policy/project/ strategy etc impact on equality groups? What information / data do you have? What further information do you need? What cross-strand issues do you need to consider? Please include any actual or potential impacts on stakeholders (e.g., Staff; Pupils; Governors; Trustees)	
Race	
Sex	
Age	
Disability	
Pregnancy and Maternity	
Gender Reassignment	
Marriage and civil partnership	
Religion or Belief	
Sexual Orientation	

Improvement Plan
The Improvement Plan needs to outline actions you propose to take to mitigate actual or potential negative impacts.

Issues Identified	Action Required	Lead	Timescale	Comments

Governance, ownership and approval

Please state here who has approved the actions and outcomes of the assessment		
Name	**Job title**	**Date**

Publishing

This document will act as evidence that due regard to equality and diversity has been given. For record keeping purposes a copy will be kept on file with a copy of the policy and one with the Governing Body / Board of Trustees approval.	
Date screening completed:	
Date agreed: Governors Body / Board of Trustees	