



Thameside Primary School: Whistleblowing Policy

Reviewed: June 26 (Review every 2 years)

Next review date: June 28



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Policy reviewed by:	Vicki Lucas
Key Changes:	Policy still corresponds with the most recent RBC Whistleblowing Policy for Schools issued Feb 21. RBC HR have confirmed IN June 26 that this is still the latest policy. This policy will be reviewed annually or when RBC HR issue any amendments to the Whistleblowing policy for schools (last updated February 2021). The policy remains fit for purpose with added sections: What Types of Concern Are Covered – Added data protection, cyber-security & sexual harassment Add three bullet points: • Serious breaches of data protection law, including unauthorised access, loss or misuse of personal data. • Cyber-security risks or failures that could compromise school systems or pupil/staff information. • Sexual harassment in the workplace. From 6 April 2026, disclosures relating to sexual harassment are legally recognised as protected disclosures under whistleblowing legislation. These reflect ICO expectations and the rise in cyber incidents in schools and 6 April 2026, sexual harassment protection.



Safeguards – Added explicit protection from detriment

In line with the Employment Rights Act 1996, the School will ensure that no worker suffers any form of detriment as a result of raising a whistleblowing concern. This includes (but is not limited to) changes to duties, isolation, denial of training opportunities, or negative impacts on career progression.

How to Raise a Concern – Added prescribed persons list

There are a number of **prescribed persons** that staff may contact if they believe their whistleblowing concern cannot be raised internally, or has not been addressed appropriately. For schools, the most relevant prescribed persons include:

- **Ofsted** – for concerns relating to safeguarding, leadership, management or the overall effectiveness of the school
- **Information Commissioner's Office (ICO)** – for concerns about data protection breaches or mishandling of personal information
- **Health and Safety Executive (HSE)** – for concerns relating to health and safety risks or failures
- **Local Authority Designated Officer (LADO)** – for concerns or allegations about the behaviour of staff towards children

Timescales and record-keeping – added:

The School aims to complete investigations within 20 working days where possible, or will provide an updated timescale if more time is required.

The School will maintain a confidential record of all whistleblowing concerns, actions taken and outcomes. These records will be retained in line with statutory retention schedules and may be reviewed periodically by the Governing Body to ensure the effectiveness of the policy.

The rest remains fit for purpose.



Introduction

This policy is based on the model provided by Reading Borough Council (**Whistleblowing Policy for Schools February 2021**) and has been designed to apply to staff employed in schools and much of the text relates to the relationship between the employee and the school. Staff employed in maintained schools are employees of Reading Borough Council and, therefore, there are references in the text to the relationship between the employee and the Council where this is appropriate to the operation of this procedure.

Overall responsibility for the operation and application of this procedure rests with the School Governing Body. Depending on the nature of the complaint, however, it may be felt necessary for you to raise your concerns with the Council and not a member of the School Management or Governing Body. A list of contacts can be found on page 7.

This policy is in addition to any other complaints procedures operated by the school, Council or LA, and other statutory reporting procedures that may apply to some sections.

This policy reflects the requirements of the Public Interest Disclosure Act 1998 (PIDA) and incorporates updated guidance issued by the Department for Education, the Information Commissioner's Office (ICO), and the Government's annually updated list of Prescribed Persons (2024). The School also recognises the Government's commitment to establishing an Office of the Whistleblower and will update this policy in line with any future statutory changes.

What is Whistleblowing?

Whistleblowing encourages and enables you to raise serious concerns within the School rather than overlooking a problem or blowing the whistle outside.

Whistleblowing is a worker raising a concern about wrongdoing when they have a reasonable belief that raising the concern is in the public interest. The protections are day-one rights as no qualifying period is required.

As someone who works for the School, you are often the first to realise that there may be something seriously wrong. However, you may not express your concerns because you feel that speaking up would be disloyal to your colleagues, or to the School or Council. You may also be concerned that by speaking up you may risk losing your job or damaging your career.

This policy makes it clear that you can raise a matter of concern without fear of victimisation, subsequent discrimination or disadvantage.

It is in the interest of all concerned that disclosure of wrongdoing or irregularity is dealt with properly, quickly and discreetly. This includes the interests of the School/Council, its employees, any persons who are the subject of any disclosure, as well as the person making the disclosure.

Who does it apply to?

- ALL employees of Thameside Primary School.
- Contractors working for the School, Council or LA on School premises, for example, agency staff, builders or drivers.
- Any suppliers and those providing services under a contract with either the School, Council or LA in their own premises.



- Self-employed workers.

Our Commitment

The School's Governing Body is committed to the highest possible standards of openness, honesty and accountability. In line with that commitment, you are encouraged, if you have serious concerns about any aspect of the School and/or Council's work, to come forward and voice those concerns. It is recognised that certain cases will have to proceed on a confidential basis.

The policy has the support of the recognised trade unions.

What types of concern are covered?

Types of concern may be about, for example:

- Conduct which is a criminal offence or a breach of law.
- Suspected fraud or corruption (see below for more information on fraud)
- Serious breaches of data protection law, including unauthorised access, loss or misuse of personal data.
- Cyber-security risks or failures that could compromise school systems or pupil/staff information.
- Sexual harassment in the workplace. From 6 April 2026, disclosures relating to sexual harassment are legally recognised as protected disclosures under whistleblowing legislation.
- Disclosures related to miscarriages of justice.
- Dangerous procedures or activities risking Health and Safety, including risks to the public as well as other employees.
- Discrimination or abuse on grounds of race, gender or disability.
- Damage to the environment.
- Breaches of established standards of good practice or agreed procedures.
- The inappropriate use or breaches of the school's regulated procedures.
- Action which is contrary to the Code of Conduct for employees or function or conduct of the Governing Body.
- Suspected sexual or physical or other abuse of pupils or other clients.
- Other unethical conduct, or
- Safeguarding failures.

Fraud

Thameside Primary School operates a zero-tolerance attitude to fraud and requires all staff, governors and volunteers to act honestly and with integrity at all times, and to report all reasonable suspicions of fraud.

Definition of Fraud

Definition of Fraud The term 'fraud' is often used to describe complex financial offences such as false accounting. However, in its simplest form, fraud is lying in order to secure material or financial gain. Some people will lie, or withhold information, or generally abuse their position to try to trick someone else into believing something that isn't true. Examples might include:



- Sending fake invoices for goods and services that weren't ordered or received.
- Use of the school's purchase card to make personal purchases.
- Intercepting a school cheque and amending the name of the payee and/or the amount.
- Submitting false claims for sickness or expenses.

Individuals caught committing fraud can be prosecuted under the Fraud Act 2006 if they make a false representation, fail to disclose information or abuse their position.

Training and oversight

The Headteacher, School Business Manager, Finance Officer and members of the Finance and Staffing governing committee take annual Fraud Awareness training to support with detection and prevention. The Governors also oversee the financial performance of the school, including its assets, making sure the school's money is well spent and measures are in place to prevent losses or misuse, including arrangements for preventing and detecting fraud.

The School follows the latest CIPFA Counter Fraud Standards (2022) and will update its procedures in line with any future revisions.

Safeguards

The School recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. If you believe what you are saying to be true, you should have nothing to fear because in reporting your concern you will be doing your duty to your employer and those for whom you are providing a service.

The School will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern. If appropriate, the School's harassment procedure will apply to those who carry out this unacceptable behaviour.

From 6 April 2026, sexual harassment in the workplace is included within the scope of protected disclosures. This means that any worker raising a concern about sexual harassment is legally protected from detriment, including dismissal, as a result of making that disclosure.

In line with the Employment Rights Act 1996, the School will ensure that no worker suffers any form of detriment as a result of raising a whistleblowing concern. This includes (but is not limited to) changes to duties, isolation, denial of training opportunities, or negative impacts on career progression.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary, grievance, capability or other procedures that already affect you.

Confidentiality

The School will do its best to protect your identity when you raise a concern and do not want your name to be disclosed. It must be appreciated that the investigation process may reveal the source of the information and a statement by you may be required as part of the evidence. You will be given prior notice of this and a chance to discuss the consequences if these circumstances arise.

The confidentiality of service users will not be compromised as employees have a duty in law and with their professional codes of conduct to maintain this.



All whistleblowing records will be held securely, with access strictly limited to authorised staff namely the Headteacher or the School Business Manager if this is deemed appropriate. Personal data will be processed in accordance with UK GDPR and the Data Protection Act 2018. Information will only be shared where legally required or where necessary to investigate the concern, and the whistleblower will be informed before any disclosure is made.

Support for Whistle-blowers

Trade Unions

If you are a trade union member, you are encouraged to raise and discuss matters with your union representatives before seeking to invoke the Whistleblowing Policy. Trade unions can advise you whether or not to proceed and the best way to present your disclosure.

A trade union representative may also accompany or represent you at any meetings in connection with a disclosure under this Policy.

Human Resources (HR) Department

The School's HR provider can be a place where you can discuss how to make a disclosure and lodge a matter of concern (see below). Staff and non-employees will often discuss the issues that worry them with the HR team in the first instance. Such discussions will be in confidence if that is what you prefer, but there may be some disclosures (for instance criminal acts) that cannot remain confidential. However, you will be given time and space to explore your options to take matters forward.

Employee Assistance Programme (EAP)

Employees in Reading Borough Council maintained schools can contact the EAP (provided by Workplace Options) to discuss any concern you may have about work or your personal life, that is having an impact on you being able to carry out your work.

Although they offer a confidential counselling service, they are not able to make this unconditional confidentiality. They are bound by professional codes of ethics.

What is guaranteed, however, is that any matter that you discuss with them, will be given as much support, sensitivity and confidentiality as is possible. If for any reason, (and this will be on a very rare occasion), that the EAP feels that the information they have heard cannot remain confidential, (e.g. because of any third-party involvement), then they will discuss this with you, and try to seek agreement on how to proceed with the matter.

The EAP offers free and confidential information and advice for all staff 24/7, 365 days a year. The EAP service can be accessed via the website <https://wisdom.healthassured.org/login>, the Wisdom mobile app, or by calling them on 0800 028 0199. To use the Wisdom app, or the Wisdom portal on a desktop, please enter Reading Borough Council's organisation code MHA179566. You will then be prompted to create an account, and once you have done so, you can access all the online services and well-being tools provided by Health Assured.

As well as the telephone number, there are live chat and video call facilities via the app/website if they would prefer to speak to someone through those means. The app and website also have lots of self-led tools and resources, such as articles, relaxation exercises and on-demand webinars on a variety of topics.

**The EAP is available to all staff in RBC-maintained schools.*



Staff may also seek independent advice from Protect (formerly Public Concern at Work), the UK's leading whistleblowing charity, which provides confidential advice on how to raise concerns safely. Website: [Protect \(formerly Public Concern at Work\) | The Live Well Directory for Liverpool City Region](#) or by telephone: 02031172520.

Anonymous Allegations

This policy encourages you to put your name to your allegation. Concerns expressed anonymously are much less powerful, but they will be considered (at the discretion of the School's Governing Body).

In exercising the discretion, the factors to be considered would include:

- the seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources or factual records.

Untrue Allegations

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, it is established that you have made malicious or frivolous allegations, or allegations for personal gain, disciplinary action may be taken against you. In such cases, the School's disciplinary procedure will apply.

How to raise a concern

The earlier you express concern, the easier it is for someone to take action.

Concerns may be raised verbally or in writing. You should be prepared to set out the background and history of the concern, giving names, dates and places where possible and the reason why you are particularly concerned about the situation.

If you are an employee –

As a first step, you should normally raise concerns with your immediate manager or the Headteacher. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, if you believe that management is involved, or if you feel that you have not received a satisfactory response to your concern, you should approach a Chair of the Governing Body or a member of the Governing Body.

- Report concerns **about a member of staff or volunteer** to the headteacher or the Deputy head in person immediately.
- Report concerns **about the headteacher** to the chair of governors, Paul Cowley, by contacting him on chair@thameside.reading.sch.uk

You can also refer the matter to Reading Borough Council Internal Audit by calling 0800 043 0699, emailing Whistleblowing@reading.gov.uk or by writing to Corporate Investigations Team, Civic Offices, Reading RG1 2LU. You can visit the council's whistleblowing webpage by click here <https://www.reading.gov.uk/the-council-and-democracy/council-strategies-plans-and-policies/whistleblowing/>



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- **Health and Safety Executive (HSE)** - for concerns relating to health and safety risks or failures
- **Local Authority Designated Officer (LADO)** - for concerns or allegations about the behaviour of staff towards children

If you are not an employee –

(e.g. agency staff, contractors, etc.) you can discuss your concerns with a relevant colleague or manager within the school that you are working in – in most cases this would be the Headteacher. You can also seek advice from the Council's HR Department, your own employer or the Council's Internal Audit Service (see above). **Even though you may not be an employee, you are entitled to raise your concerns with** the Chair of the Governing Body or a member of the Governing Body. The same safeguards and regards for your protection will still apply under this policy.

If your concern is a Safeguarding matter and you feel you cannot raise it in school via the normal safeguarding reporting procedures or you have raised the matter and it is not being addressed, you can use the NSPCC's whistle blowing helpline on:

Tel: 0800 028 0285 (8am to 8pm Monday to Friday; 9am to 6pm weekends)

Email: help@nspcc.org.uk

The Whistleblowing Advice Line offers free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation. If you think an organisation is putting children at risk, even if you're not certain, call NSPCC today to talk through your concerns.

Because of the difficulty of raising a concern, you may ask your trade union or other representative to raise a matter on your behalf, or ask them to accompany you to meet with your manager or other officer. You may also wish to consider speaking to a colleague who may have experienced the same concern.

How will the School respond?

Acknowledgement

Receipt of your concern will be acknowledged immediately and, within five working days of the concern being received, the School will write to you:

- indicating how the matter will be dealt with;
- giving an estimate of how long it will take to provide a final response;



- telling you whether any initial enquiries have been made;
- supplying you with information on sources of support; and
- telling you whether further investigations will take place, and if not, why not.

Action under the Whistleblowing Policy

The action taken by the School will depend on the nature of the concern. The matters raised may be followed up in one of the following ways:

- be investigated internally by the management of the School (it must be emphasised that no-one who is the subject of a complaint or concern will be involved in the handling of it), the Council's Internal Audit or through the School's disciplinary procedures;
- be referred to the Police;
- be referred to an external auditor;
- be the subject of an independent enquiry.

In order to protect individuals and the School, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures, (for example, child protection or discrimination issues) will normally be referred for consideration under the relevant procedures.

Some concerns may be resolved by agreed action between the manager, individual and those whose actions had caused concern. If urgent action is required, this will be taken before any investigation is conducted.

Timescales and record-keeping

The School aims to complete investigations within 20 working days where possible, or will provide an updated timescale if more time is required.

The School will maintain a confidential record of all whistleblowing concerns, actions taken and outcomes. These records will be retained in line with statutory retention schedules and may be reviewed periodically by the Governing Body to ensure the effectiveness of the policy.

Contact

The amount of contact between the people considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from you as part of the investigation process.

Attending Meetings

When any meeting is arranged, you have the right, if you so wish, to be accompanied and represented by a trade union representative or a person of your choice who is not involved in the area of work to which the concern relates.

The School will take steps to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, the Council will advise you about the procedure.



Outcome

The School accepts that you need to be assured that the matter has been properly addressed. Subject to legal constraints, you will receive information about the outcomes of any investigations, and the action that is to be taken. Also, if appropriate, what changes are to be made to monitor procedures to ensure that a similar concern is not raised in the future.

How the matter can be taken further

The School Governing Body hopes you will be satisfied that any matter you raise has been considered properly. If you are not satisfied, and if you feel it is right to take the matter outside the School, the following are possible contact points:

- the Local Government Ombudsman;
- the external auditor;
- relevant professional bodies or regulatory organisations (Government guidance, [*Blowing the Whistle to a prescribed person: list of prescribed people and bodies*](#), is available on the GOV.UK website);
- the police.

If you do take the matter outside the Council, you need to ensure that you do not disclose prohibited confidential information.

V Lucas, SBM