

Whistleblowing Policy and Procedure

2026–2027

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Policy owner	Headteacher
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Chair of Governors	
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Safe • Kind • Responsible

1. Statement of intent

Ainslie Wood Primary School is committed to the highest standards of openness, integrity, accountability and safeguarding. We want staff and others working with the school to feel able to speak up when they reasonably believe that serious wrongdoing, unsafe practice or a failure to act is taking place.

Concerns raised under this policy will be taken seriously and considered fairly. We will take reasonable steps to protect the confidentiality of a person raising a concern and will not tolerate victimisation, harassment or other detrimental treatment because a worker has raised a genuine concern in the public interest.

A person does not need to prove that wrongdoing has occurred before raising a concern. A reasonable belief that wrongdoing has occurred, is occurring or is likely to occur is sufficient to raise the matter. Concerns raised in good faith will not result in disciplinary action simply because they are not substantiated.

2. Policy aims

This policy aims to:

- encourage staff and workers to raise suspected wrongdoing as soon as possible;
- provide clear and accessible routes for raising concerns, including where the concern relates to senior leaders;
- ensure concerns are considered promptly, consistently and fairly;
- protect confidentiality as far as reasonably possible and explain the limits of confidentiality;
- make clear that victimisation of a whistleblower is unacceptable;
- explain the legal protection that may apply to qualifying protected disclosures;
- distinguish whistleblowing from personal grievances, complaints and safeguarding allegations; and
- explain how concerns may be escalated externally where appropriate.

This policy applies to employees and other workers providing services to the school, including agency workers, contractors, consultants and temporary staff. Volunteers and governors are also encouraged to use the routes in this policy to raise serious concerns, although statutory whistleblowing protection does not apply to every category of person in the same way.

This policy does not form part of any employee's contract of employment and may be amended following review and approval by the Governing Body.

3. Legal and statutory framework

This policy has been prepared with regard to current statutory and government guidance, including:

- Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998;
- Keeping Children Safe in Education 2026;
- Working Together to Safeguard Children;
- Department for Business and Trade whistleblowing guidance for employers and workers;
- the current list of prescribed persons and bodies for protected disclosures; and
- London Borough of Waltham Forest guidance and model procedures for maintained schools.

Ainslie Wood is a maintained community school. The Governing Body is responsible for agreeing and establishing the school's whistleblowing procedure.

4. What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing at work where the person raising the concern reasonably believes that the disclosure is in the public interest. In law, this may amount to a 'protected disclosure' where the relevant statutory conditions are met.

Examples include, but are not limited to:

- a criminal offence, including fraud, bribery or corruption;
- a failure to comply with a legal obligation or statutory requirement;
- a miscarriage of justice;
- danger to the health or safety of any individual;
- serious safeguarding failures or unsafe practice;
- damage to the environment;
- serious financial mismanagement or breach of financial procedures; and
- deliberately concealing or covering up any of the above.

5. What is not normally whistleblowing?

A concern that relates only to an individual employee's own employment situation will usually be dealt with under the school's Grievance Procedure. This may include concerns such as an individual employment dispute, bullying or harassment that affects the employee personally.

Complaints from parents, carers or members of the public should normally be raised through the school's Complaints Procedure.

Where a concern relates to the conduct of a member of staff or volunteer towards a child, the school's safeguarding and allegations procedures must also be followed. Whistleblowing may be appropriate where, for example, unsafe safeguarding practice is being ignored, a concern has not been acted upon, or a member of staff believes that leadership has failed to respond appropriately.

6. Raising a whistleblowing concern

When to raise a concern

Raise a concern as soon as reasonably possible if you believe that wrongdoing has occurred, is occurring or is likely to occur. You do not need to investigate the matter yourself or obtain proof before speaking up.

Who to report to

- In most circumstances, raise the concern with the Headteacher, Julie Crouch.
- If the concern relates to the Headteacher, or you reasonably believe the Headteacher may be involved, raise it with the Chair of Governors, Bruce Roberts.
- If the concern relates to the Chair of Governors, or it would not be appropriate to use the internal routes above, advice may be sought from the London Borough of Waltham Forest, a relevant prescribed person/body, Protect, a trade union or legal adviser.
- Where there is an immediate risk of harm to a child, follow the school's safeguarding procedures without delay. If a child is in immediate danger, contact the police on 999.

Concerns for the Chair of Governors may be submitted via the school office in an envelope or email clearly marked 'Private and Confidential – for the Chair of Governors'. Where using the school office would itself compromise confidentiality or be inappropriate, staff should use an external route described in section 10.

How to raise the concern

Concerns should preferably be raised in writing, but a concern will not be disregarded because it is raised verbally. Provide as much information as you reasonably can, including what happened, relevant dates and places, who may be involved, why you are concerned and whether you have any personal interest in the matter.

Anonymous concerns will be considered, but anonymity can make investigation and feedback more difficult. A person who wishes their identity to be kept confidential should say so at the outset. The school will take reasonable steps to maintain confidentiality but cannot promise absolute confidentiality where disclosure is required by law, safeguarding duties or a fair investigation.

7. How the school will respond

Initial consideration

The person receiving the concern ('the recipient') will acknowledge it and arrange to speak with the whistleblower within a reasonable timeframe. The whistleblower may be accompanied by a trade union or professional association representative or workplace colleague where appropriate.

The recipient will:

- listen to and record the concern carefully;
- clarify the information available and what outcome or action the whistleblower believes may be needed;
- consider whether the matter falls under this policy or should be managed under another procedure;
- consider any immediate safeguarding, health and safety, legal, financial or evidence-preservation action required;
- explain how confidentiality will be handled;
- confirm that victimisation or detrimental treatment for raising a genuine concern will not be tolerated; and
- decide whether further investigation or referral is required.

Investigation

Where further investigation is required, the recipient will appoint an appropriate person to investigate. This may be a senior leader, governor, local authority officer or an independent external investigator, depending on the nature and seriousness of the concern and any potential conflict of interest.

The matter may also need to be referred to an external body such as the Local Authority Designated Officer (LADO), children's social care, police, auditors or another regulator. Any safeguarding allegation about a person who works with children will be managed in accordance with Keeping Children Safe in Education and Waltham Forest allegations procedures.

The whistleblower will be told, as far as reasonably possible, how the concern will be handled and when they can expect a further update. Exact timescales will depend on the complexity and seriousness of the matter.

Outcome and feedback

At the conclusion of the process, the investigating person will record the findings, any recommendations and any action or external referral required. The whistleblower will be informed that the matter has concluded and, where possible, given appropriate feedback. The school may be unable to share detailed information about disciplinary, safeguarding or other confidential matters.

The school will consider whether any wider policy, training, safeguarding, governance or organisational learning is required following the concern.

8. Protection from detriment and victimisation

Workers who make a qualifying protected disclosure through an appropriate route are protected by law from dismissal or detrimental treatment because they have blown the whistle. Ainslie Wood will not tolerate retaliation, harassment, bullying, disadvantage or victimisation of a person because they have raised a genuine concern.

Any member of staff who believes they have been subjected to detrimental treatment because they raised a concern should report this promptly to the Headteacher or, where the concern involves the Headteacher, to the Chair of Governors.

9. Deliberately false or malicious allegations

A concern raised honestly or on reasonable grounds will not lead to disciplinary action merely because it is mistaken or is not substantiated.

If an investigation establishes that a member of staff knowingly made a deliberately false or malicious allegation, the school may consider action under its disciplinary procedures. The fact that a concern is unsubstantiated does not, by itself, mean that it was malicious.

10. Escalating concerns and external advice

Ainslie Wood encourages concerns to be raised internally where it is safe and appropriate to do so. However, a worker may seek independent advice or make a disclosure to an appropriate external body, particularly where they believe the internal route is inappropriate, the concern has not been addressed, or they reasonably fear detrimental treatment.

Useful external routes include:

- NSPCC Whistleblowing Advice Line: 0800 028 0285 or help@nspcc.org.uk – for concerns about how child protection or safeguarding issues are being handled;
- Protect (independent whistleblowing charity): confidential advice for workers considering how to raise a concern;
- London Borough of Waltham Forest: for local authority advice and, where relevant, whistleblowing or safeguarding routes;
- Waltham Forest LADO: for concerns about the conduct of a person who works with children where the relevant threshold may be met;
- Department for Education / Secretary of State for Education: a prescribed person for specified education matters, including maintained schools; and
- other prescribed persons or regulators whose remit covers the particular wrongdoing.

A disclosure to an external body is only legally protected in certain circumstances. Staff considering external disclosure are encouraged to seek advice from Protect, their trade union or a legal adviser and to check the current government list of prescribed persons and bodies.

Ofsted has specific prescribed-person functions for certain education matters. Staff should not assume that every concern about a maintained school falls within Ofsted's prescribed remit; the correct external body depends on the nature of the concern.

11. Safeguarding-specific concerns

Keeping Children Safe in Education 2026 makes clear that staff should feel able to raise concerns about poor or unsafe safeguarding practice and potential failures in the school's safeguarding arrangements. Concerns should normally be raised with the school's senior leadership team.

If a staff member feels unable to raise a safeguarding concern internally, or believes that a genuine safeguarding concern is not being addressed, the NSPCC Whistleblowing Advice Line is available. Waltham Forest also advises that anyone may contact the LADO team to discuss concerns about a person who works with children.

This whistleblowing policy does not replace the requirement to act immediately where a child may be at risk. Staff must follow the Safeguarding and Child Protection Policy and report concerns without delay.

12. Records, confidentiality and data protection

Records of whistleblowing concerns and investigations will be kept securely, with access limited to those who need the information for legitimate purposes. Information will be handled in accordance with data protection law, safeguarding requirements and applicable retention arrangements.

The school will balance the whistleblower's wish for confidentiality with its duties to investigate fairly, safeguard children and comply with the law. Information identifying the whistleblower will not be disclosed unnecessarily.

13. Monitoring, approval and review

The Governing Body is responsible for approving and overseeing this policy. The Headteacher is responsible for ensuring that staff know how to access and use it and that concerns are handled appropriately.

This policy will be reviewed annually, or sooner if there is a significant change in legislation, statutory guidance, local authority procedure or school arrangements.

Approved by the Governing Body: September 2026

Next review: September 2027