BJS Federation of Schools

Whistleblowing Policy

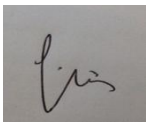
Policy Adopted by Executive Headteacher: Summer 2022

Policy Due for Review: As updated by the LA



Signed

Ms A. Parker, Executive Headteacher

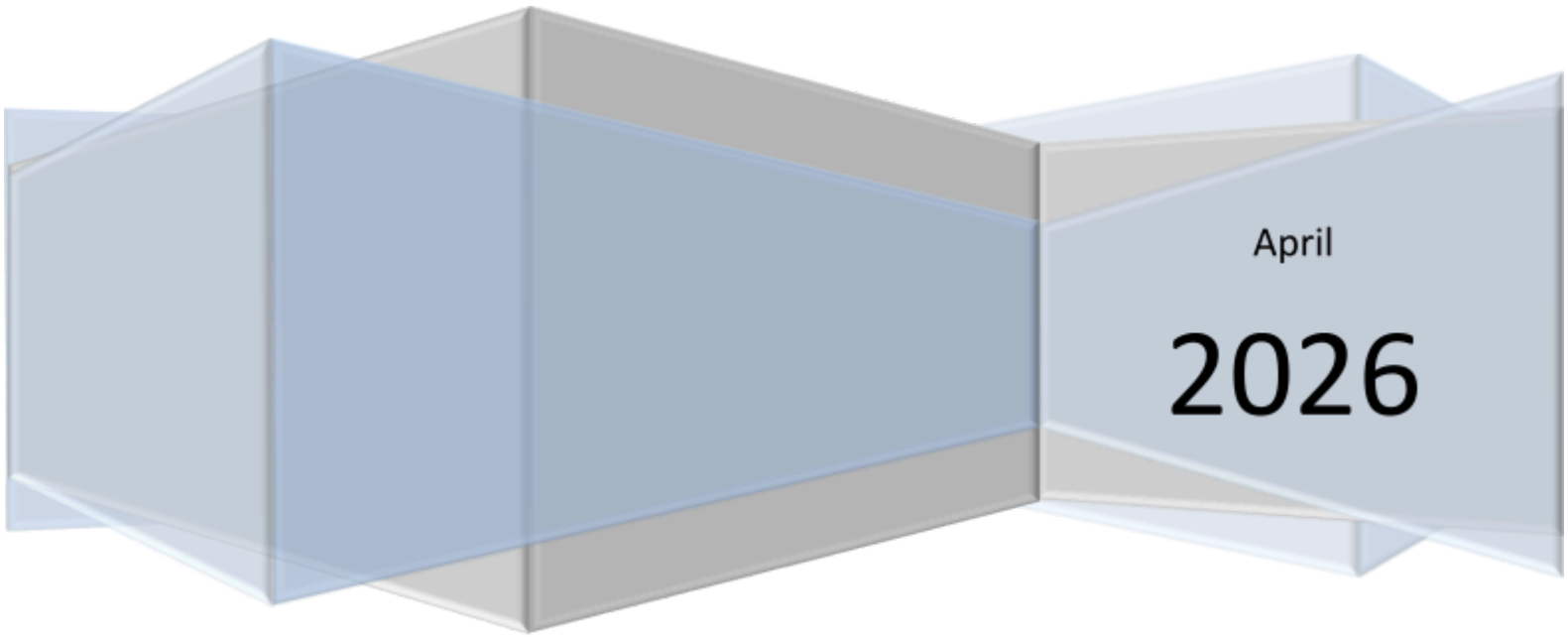


Signed

Mrs F. Morris, Chair of Full Governing Board

Date	Revision/Amendment Details & Reason	Author
Spring 22	New version of policy	Lambeth Council
Spring 26	New version of policy	Lambeth Council

Whistleblowing Policy And Procedure



Lambeth Schools HR

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1. Introduction

1.1 Introduction

Lambeth Council (the Council) and the School recognise that their employees are well positioned to know when something wrong is taking place within the Council / School or is a serious cause for concern. They may not express their concerns however, because they feel that speaking up would be disloyal to their colleagues or to the Council / School. They may also fear harassment or victimisation.

Whistleblowing is the act of reporting suspected wrongdoing, illegal activity, or serious risk within the organisation that is in the public interest, so it can be investigated and addressed appropriately. Whistle blowing is not about complaints about your own employment (these should normally be raised under the appropriate HR procedure).

1.2 Policy Statement

The Council / School is committed to the highest possible standards of openness, probity, and accountability. In line with that commitment the Council / School encourages its employees and others with serious concerns about any aspect of the Council/School's work to come forward and voice their concerns.

This Whistleblowing Policy (the Policy) has been developed in accordance with the Public Interest Disclosure Act 1998 and the Employment Rights Act 2025 effective from October 2026, individuals making a protected disclosure under this policy are legally protected against:

- Dismissal or unfair treatment
- Victimisation or retaliation
- Breaches of confidentiality

The Policy provides a framework for employees to raise concerns, that are in the public interest[1], 'in-house' and without fear of victimisation, subsequent discrimination, ordisadvantage.

This Policy aims to:

- encourage staff to feel confident about raising concerns and to question and act on those concerns.
- provide a way for staff to raise concerns and receive appropriate feedback on any action taken.
- confirm that all concerns raised will be examined and the Council / School will assess what action should be taken.
- reassure staff that they will be protected from reprisals or victimisation for whistleblowing in the public interest in accordance with this procedure; and
- provide ways for staff to take the matter further if dissatisfied with the Council / School's response.

[1] See Employment Rights Act 1996 S43A to 43L Employment Rights Act 1996.

2. Application and scope of the Policy

2.1 This Policy applies to all employees and those contractors working for the Council / School. Employees include staff working for the Council / School on a temporary basis, casual or sessional workers and trainees. The Policy also applies to agency workers and suppliers and those providing services under a contract with the Council / School in their own premises.

2.2 This Policy is in addition to and distinct from the Council / School's Complaints Procedure that provides a facility to those not employed by the Council / School (e.g., service users, advocates, family members and members of the public) to raise any concern.

2.3 This Policy is not intended to cover concerns that can be progressed under existing Human Resources procedures. There are existing procedures in place to enable employees to lodge a grievance relating to their own employment.

2.4 Some Council departments may have separate procedures specifically relating to departmental functions. For example, Education and Social Care have adopted multi-agency child protection procedures in addition to procedures for the protection of vulnerable adults. All acts of whistleblowing can be raised under this Whistleblowing procedure and employees shall have the full protection of this Policy. Where the matter for investigation is covered by separate procedures, however, these will be applied where appropriate.

2.5 This Policy is intended to cover serious concerns that may fall outside the scope of other procedures, and include the following:

- A criminal offence has been committed or is likely to be committed;
- A miscarriage of justice
- Conduct that endangers the health and safety of other employees and/or members of the public
- Safeguarding of children and young people and vulnerable adults
- Conduct that involves damage to the environment (e.g., pollution)
- The unauthorised use of public funds (e.g., expenditure on improper use)
- Possible bribery, fraud, and corruption in relation to the providing or receiving of Council/School services
- Any conduct that is contrary to the Council's Standing Orders or Policies (e.g. a breach of Council, School or statutory codes of practice)

2.6 The above does not represent an exhaustive list of areas covered by this Policy. Any serious concerns that employees may have about any aspect of service provision or the conduct of officers or Members of the Council or others acting on behalf of the Council / School can be reported under this Procedure.

3. Safeguards against harassment or victimisation.

3.1 The Council / School is committed to good practice and high standards and wants to be supportive of all its employees.

3.2 Whistle-blowers raising matters of serious concern internally are protected from harassment, victimisation, disciplinary action or dismissal or any other disadvantage at work because of raising the concern (even if their disclosure or any wrongdoing or malpractice is not substantiated after investigation), provided they raise/disclose issues in the reasonable belief that they are doing so in the public interest.

3.3 A person would not be protected from disciplinary action if, for example, they raised a concern they knew to be false or malicious.

3.4 The Council / School will not tolerate harassment or victimisation and will act as is necessary to protect employees when they raise concerns in the public interest under this Policy**.**

4. How to Raise Your Concerns.

4.1 As a first step, you should raise any concern you have with your line manager or their manager, verbally or in writing. If you do not feel comfortable with this you should contact one of the following, depending on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice or wrongdoing:

- The Headteacher or Chair of Governors and not inform multiple governors as they may be needed to carry out any investigations or be involved in subsequent procedures.
- Paul Rock, Assistant Director of Internal Audit and Counter Fraud, is the main point of contact for staff wishing to report an incident using the whistleblowing procedure. You can email Paul at prock@lambeth.gov.uk or call on 07874 883096.

4.2 If staff have any safeguarding concerns, including modern slavery, in relation to residents or service users these should be addressed urgently as follows:

- For any concerns relating to children please email helpandprotection@lambeth.gov.uk
- For any concerns relating to adults please email either djennings1@lambeth.gov.uk or kbuck@lambeth.gov.uk
- For all safeguarding concerns please call Kate Buck on 0207 926 5881

4.3 You can also contact one of the following to raise a concern:

- Email raiseaconcern@lambeth.gov.uk
- Corporate Director of Finance (section 151 officer), Zena Cooke on 020 7926 6943, email: zcooke@lambeth.gov.uk
- The Counter Fraud Team by email to Investigations@lambeth.gov.uk or by phone on 0207 926 1111 (fraud hotline)
- A Corporate Director, Director, Assistant Director or Head of Service
- Anybody who has a whistleblowing concern about any local authority's Children's safeguarding services or practice can use Ofsted's Whistleblowing Hotline: 0300 1233155, email address: whistleblowing@ofsted.gov.uk , or write to the Ofsted whistleblowing team at: WBHL, Ofsted, Piccadilly Gate, Store Street, Manchester. M1 2WD (Where a concern relates to immediate risk of harm, safeguarding procedures must be followed without delay.)

5. How Will the Council/School Respond?

5.1 The Council / School's response will depend on the nature of the concern that has been raised. In all instances the Council / School will:

- record and acknowledge your concern and refer the matter for investigation within three working days of receiving the referral.
- respect your confidentiality; your identity will not usually be disclosed to anyone without your consent.
- assess your concerns to determine further action.
- let you know that enquiries have been made.
- tell you whether further investigations will be made and if not, why; and
- inform you of the outcome of the inquiry.

5.2 Depending on the nature of the issue raised, the Council / School may:

- request more information or evidence from you.
- investigate through an investigation or audit.
- undertake disciplinary action.
- launch an independent enquiry; or
- refer the matter to the police.

6. Anonymous Allegations

6.1 Allegations made anonymously cannot be subject to the protections afforded by this Procedure as the protections are specifically designed to protect those persons, who fall within the scope of this Policy, making allegations. Anonymity will be respected as far as possible, and identity is shared where necessary and lawful.

6.2 Anonymous allegations will, however, be considered by the Council / School if it decides to exercise its discretion.

6.3 In exercising this discretion, the Council / School will take account of all relevant factors which will include:

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

7. Rights and Responsibilities of Employees

7.1 All employees are required to report any issue of concern regarding the provision of services or management of those services as soon as they arise to avoid any unnecessary delay. In most cases, this will be done through the usual line management arrangements.

7.2 To gain protection under this Procedure, the employee must reasonably believe that the disclosure is made in the public interest. Employees are not otherwise required to 'prove' the truth of any allegation. Whistle-blowers will, however, need to demonstrate that there are reasonable grounds for the concern, and will be expected to co-operate with any investigation that takes place.

7.3 When any meeting or interview is arranged, employees may, if they so wish, be accompanied by a trade union official or a workplace colleague.

8. Can I take the matter further if I am not satisfied?

This Procedure is intended to provide employees with an avenue to raise concerns within the Council / School. There may be circumstances where an employee considers that they need to raise the matter externally. This may be because, for example, there is a need to involve the appropriate external regulatory body, or the employee considers that the matter has not been properly addressed.

8.1 If employees feel it is right to take the matter outside the Council / School, the following may be appropriate:

- the National Audit Office's Public Interest Disclosure Line: 020 7798 7999
- the independent charity Protect: 020 3117 2520; whistle@protect-advice.org.uk
- a Local Councillor
- a recognised trade union
- the Whistleblowing Helpline for NHS and Social Care on 08000 724725
- the Care Quality Commission on 03000 616161; enquiries@cqc.org.uk

8.2 If taking a concern outside the Council / School, employees should not disclose any confidential information unless they are doing so in accordance with the Whistleblowing Policy.

8.3 In circumstances where an employee decides to raise the matter externally, they will only be protected under this Policy, and under employment law, where the disclosure is made in accordance with Section 43of the Employment Rights Act as amended by the Enterprise and Regulatory Reform Act 2013. This means that the disclosure must fall under one of the categories listed in Section 43 (above)and must be made in one of the following ways:

a. While obtaining legal advice

b. To a prescribed regulatory body provided the disclosure is made in the reasonable belief that it is in the public interest, and the employee reasonably believes the prescribed body is responsible for the matter of concern and that the information and allegation/s are substantially true.

See https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2

c. To other third parties (including the media) where the employee makes the disclosure:

- In the reasonable belief that it is in the public interest and that the information and allegations are substantially true, and
- Does not make the disclosure for personal gain, and
- Has already raised the matter with the Council / School or prescribed regulator,

unless the employee reasonably believes that they will suffer a detriment, or there is no prescribed regulator and they reasonably believe that evidence will be

concealed or destroyed if they make the initial disclosure to the Council / School, and
In all the circumstances it is reasonable to make the disclosure.

d. The disclosure is of an exceptionally serious nature, and the Whistle-blower makes the disclosure:
   - In the reasonable belief that it is in the public interest and, that the information and allegations are substantially true, and
   - Does not make the disclosure for personal gain, and
   - In all the circumstances it is reasonable to make the disclosure.

When considering whether it is reasonable for the worker to make the disclosure, regard will be had particularly to the identity of the person to whom the disclosure is made.

9. Responsible Officer

9.1 The Assistant Director of Internal Audit and Counter Fraud is responsible for the supervision and co-ordination of all counter fraud matters, including the maintenance and operation of this Procedure. A record of all concerns raised, and the outcomes will be maintained and reported periodically to Corporate Committee, which has responsibility for oversight on such matters.

10. Revisions to this Policy.

10.1 Where the School/Council wishes to amend this policy, it will consult with the relevant trade unions with a view to reaching agreement over the proposed amendment(s). This policy may be amended by agreement with the relevant trade unions at any time. Where agreement has not been reached with the relevant trade unions arising from consultations, the School/Council reserves the right to implement its proposed amendment(s) by giving one month's notice to employees of its proposal(s).

This Policy is approved and signed by:



Interim Director, Education & Learning

Name: Sophie Garner

Date: April 2026

Agreed on behalf of all School Trade Unions

Date: April 2026

Chair of Governors of School or Federation .....

Name:

Date:

This policy will be reviewed **bi-annually** or sooner if legal or organisational changes occur.

Appendix 1 – Version Details.

	Summary of changes from LBL May 2025 version
Feb 2026	Definition of Whistle Blowing added
Sections	**Updated to align with Council's Policy**
1.2 & 2.5	Paragraphs updated
4.1, 4.2 & 4.3	Updated contact details
6.1	Sentence added - Anonymity will be respected as far as possible and identity is shared where necessary and lawful
8, 8.3, 8.4 & 9	Paragraphs amended
Policy approval	The policy has been updated to reflect a change of signatory.
	Version date: Draft version 6 April 2022
Section	**Summary of changes from 2008 version.**
All	Updated to align with Council's policy
Section 5	Clarifying position in relation to confidentiality
All	Updated some statutory references
	Formatting changes
	Minor changes