

## The Croft Preparatory School

### Whistleblowing Policy

Whole School Policy, including Early Years Foundation Stage

Policy Reviewed (PM)	15 January 2026
Peer Review Completed	N/A
Ratified by SLT	20 January 2026
Next Review Date	January 2029

The legal responsibility for ensuring that the Croft Preparatory School adheres to all relevant statutory regulations, as issued by the DfE, lies with the Proprietors. At their discretion, the Proprietors may delegate the monitoring of the efficacy with which the school discharges its statutory duties to the Board and Governing Committee.

Notwithstanding the above delegation, the Proprietors retains ultimate responsibility for how the statutory functions are executed.

## GENERAL INFORMATION FOR WHISTLEBLOWING

### About this Policy

We are committed to conducting our business with honesty and integrity and expects all staff to maintain high standards in accordance with our Code of Conduct/Behaviour Policy. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

### Aims

Our policy on whistleblowing is intended to demonstrate that we:-

- will not tolerate malpractice;
- encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that your concerns will be taken seriously and investigated, as appropriate;
- respect your confidentiality if you raise concerns and we will provide procedures to maintain your confidentiality so far as is consistent with progressing the issues effectively;
- will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;



- will only invoke the School's Disciplinary Procedure in the case of false, malicious, vexatious or frivolous allegations. The policy seeks to reassure you that you can raise genuine concerns without fear of reprisal, even if you turn out to be mistaken; and
- will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

## Scope of this Policy

This procedure is separate from our adopted procedures regarding grievances. You should not use the whistleblowing procedure to raise concerns relating to your own personal circumstances, such as the way you have been treated at work. In those cases, the Grievance Procedure, Anti-Harassment and Bullying Policy or Prevention of Sexual Harassment Policy should be used, as appropriate. If you are uncertain whether something is within the scope of this procedure, you should first seek advice from the Head or the HR Manager.

This procedure has been implemented to enable you to express a legitimate concern regarding suspected malpractice within the School.

## What is Whistleblowing?

**Whistleblowing** is the disclosure of information which relates to suspected wrongdoing, malpractice or dangers at work. 'Malpractice' is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of ethics, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment (negligence).

A **whistleblower** is a person who raises a genuine concern relating to suspected malpractice within the School. If you have any genuine concerns related to suspected malpractice affecting any of the School's activities (a whistleblowing concern), you should report it under this procedure.

If you feel unable to raise an issue with us or feel that genuine concerns are not being addressed, you may report your concerns to other whistleblowing channels, such as:

- **Protect**, an independent whistleblowing charity (helpline: 020 3117 2502, email: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk), website: <https://protect-advice.org.uk/>).
- The NSPCC whistleblowing helpline (tel: 0800 028 0285 or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)).

## Confidentiality

We hope that you will feel able to voice whistleblowing concerns openly under this procedure. However, if you wish to raise a concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating the concern to know your identity, this will be discussed with you.

If there is evidence of criminal activity, the Police will be informed in all cases.

We do not encourage you to make disclosures anonymously. However, proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should discuss this with the Headmaster or HR Manager and



appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from [Protect](#), the independent whistleblowing charity, who offer a confidential helpline. Their contact details are set out above.

## RAISING A WHISTLEBLOWING CONCERN INTERNALLY

### Raising a Concern Internally

If a member of staff has a concern about malpractice, they should, wherever possible, raise the matter with the Headmaster, in the first instance, in complete confidence. If the concern is connected to a Child Protection issue, staff must follow the school's Child Protection and Safeguarding Policy.

If the individual feels unable to raise the concern with the Headmaster due to the seriousness and sensitivity of the issues involved, or if they believe that he may be involved, they should speak to the Chair of the Governing Committee.

Concerns may be raised verbally and/or in writing. If a member of staff wishes to make a written report, they are advised to include in their letter the background and history (giving relevant dates) and give the reason why they are particularly concerned about the matter. They may also wish to seek advice from their trade union, if applicable, at this stage.

If the member of staff is personally involved in the matter being raised, they must declare this at the outset. They may invite their trade union, a member of staff from Human Resources or a work colleague to be present during any meetings or interviews (which may be arranged away from the normal workplace if so wished) in connection with the concerns raised.

A meeting will be arranged with you as soon as possible to discuss your concern. You may bring a colleague or trade union representative to any meetings under this procedure. Any companion must respect the confidentiality of the disclosure and any subsequent investigation. You may be required to attend additional meetings in order to provide further information as the concerns raised are investigated.

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. You will be kept informed of the progress of the investigation and its likely timescale. Whenever possible and subject to third party rights, you will be informed of the resolution. However, sometimes the need for confidentiality may prevent us giving specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If you are not satisfied that your concern is being properly dealt with, you will have a right to raise it in confidence with the Governing Committee. Alternatively, you can follow the external procedure below.

### External Referral Following a Concern Raised Internally

Where appropriate, the Headmaster or Proprietors will refer the matter to the relevant professional body or authority, for example, if the concern is about any financial loss or irregularity, this may be raised with the Auditor.



If a member of staff has followed the process described above and still has concerns or feels that they are unable to discuss the matter with any of the individuals above, they may wish to raise the matter with the ISC or ISI directly. If the concern is related to Child Protection, they may wish to raise it with the Local Authority Designated Officer (LADO).

## RAISING A WHISTLEBLOWING CONCERN EXTERNALLY

### External Procedures

It is hoped that this policy gives staff the confidence to raise any concerns with the Headmaster or Proprietors. If this is not the case, however, it is preferable that the concern is raised with the proper external regulator rather than not at all.

Where a member of staff acts in good faith and genuinely and reasonably believes that the malpractice falls within the remit of a regulator, and that the information disclosed is substantially true, the following prescribed regulators may be contacted (depending on the subject matter of the disclosure):

- The Audit Commission or External Auditor for concerns associated with conduct of business, value for money, fraud or corruption;
- The Environment Agency for environmental dangers;
- The Health and Safety Executive for health and safety dangers;
- The Information Commissioner's Office (ICO) or
- The Local Authority Designated Officer (where the disclosure relates to a child protection issue).

It will very rarely, if ever, be appropriate for you to alert the media.

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where you may be entitled to raise a concern directly with an external body where you reasonably believe:

- that exceptionally serious circumstances justify it;
- that we would conceal or destroy the relevant evidence;
- that you would be victimised by us; or
- where the Secretary of State has ordered it.

We strongly encourage you to seek advice before reporting a concern to anyone externally. The independent whistleblowing charity, [Protect](#), operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

## MALICIOUS ACCUSATIONS

False, malicious, vexatious or frivolous accusations will be dealt with under our Disciplinary Procedure.



## PROTECTION FROM REPRISAL OR VICTIMISATION

It is understandable that staff are sometimes worried about possible repercussions as a result of a raising a whistleblowing disclosure. We aim to encourage openness and will support you if you raise genuine concerns under this policy, even if you turn out to be mistaken.

You will not suffer a detriment or be disciplined for raising a genuine and legitimate concern, provided you do so in good faith and following the whistleblowing procedures. If you believe that you have suffered any such treatment, you should inform the Headmaster or HR Manager immediately. If the matter is not remedied, you may raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

