



Whistleblowing Policy

Introduction

Elmley Dray CIC and Elmley Dray School (“the School”) are committed to the highest standards of openness, accountability and integrity. We want all employees, volunteers, contractors and other stakeholders to know that they can raise concerns in confidence about wrongdoing, malpractice or risks within the School without fear of reprisal.

This Whistleblowing Policy is designed to provide clear guidance on how concerns can be raised and handled, in accordance with the Public Interest Disclosure Act 1998, DfE guidance for schools, and relevant safeguarding legislation.

Purpose

The School expects all individuals involved with the School to raise serious concerns they may have about any aspect of the School’s work, including conduct that may be unlawful, unsafe, unethical, abusive, or damaging to the School’s reputation or individuals’ wellbeing.

This policy aims to:

1. Encourage confidence in raising serious concerns at the earliest possible stage.
2. Provide a clear and accessible procedure for raising and managing concerns.
3. Ensure concerns are taken seriously and investigated appropriately.
4. Reassure individuals that they will be protected from retaliation if they raise a concern in good faith.
5. Ensure feedback is provided, where appropriate, to the person raising the concern.

Scope

This policy applies to all:

- Employees and volunteers of the School
- Agency and contract staff

- Contractors and suppliers
- Individuals working with or providing services to the School
- Governors/Directors

This policy covers concerns that fall outside standard grievance, complaints or disciplinary procedures, and should be used only when an individual feels unable to raise the matter via those existing routes.

Examples of concerns covered by this policy include, but are not limited to:

- Actual or suspected unlawful acts (criminal or civil)
- Child protection or safeguarding concerns
- Breach of statutory codes, policies or financial procedures
- Fraud, corruption, bribery or dishonesty
- Abuse of power, misuse of School resources
- Health, safety or environmental risks
- Discrimination, harassment, or failure to comply with professional standards
- Any other serious wrongdoing that could undermine the School's reputation or operations

This policy is not intended for challenging legitimate business decisions already made by the School, or for matters already addressed through other formal procedures.

Principles and Protection

Legal Protection

Under the Public Interest Disclosure Act 1998, individuals making a protected disclosure are safeguarded from dismissal, victimisation or any detriment, provided they follow the procedures in this policy.

Confidentiality

We will treat all whistleblowing disclosures sensitively and confidentially. The identity of the person raising a concern will not be disclosed without their consent unless required by law or necessary for investigation.

Support

We recognise that raising a concern can be stressful. Those raising concerns may seek support.

No Retaliation

The School will not tolerate any retaliation or adverse treatment against anyone raising a concern in good faith. Any such conduct will be subject to disciplinary action.

Malicious or False Allegations

Allegations made maliciously, in bad faith or for personal gain may result in disciplinary action.

Raising a Concern

Internal Reporting

1. First Contact (Normal Circumstances):
Concerns should normally be raised with the Headteacher, either verbally or in writing, as soon as possible.
2. Where the Concern Involves the Headteacher:
Concerns should be raised with the Chair of Governors/Directors.
3. Where the Concern Involves a Governor:
Concerns should be raised with the Chair of Governors.
4. Where the Concern Involves the Chair of Governors:
Concerns should be raised with the Director
5. Where the Concern Involves a Director, or where staff reasonably believe the matter is not being handled appropriately:
Concerns should be raised with an independent external body, such as:
 - Local Authority Designated Officer (LADO) (for safeguarding or conduct concerns)
 - Ofsted Whistleblowing
 - Department for Education

Information to Provide

When raising a concern, include:

- The nature of the concern and relevant facts
- Dates, locations, and individuals involved (if known)
- Any evidence available
- Whether anonymity is preferred

Meeting

A preliminary meeting will take place to clarify the concern and determine next steps. Notes will be taken and a written summary provided to the individual reporting the concern.

You may bring a colleague or union representative to support you.

Investigation Process

1. Initial Assessment
 - The relevant decision-maker will assess the concern within 10 working days.
 - Decide whether an internal or external investigation is required.
2. Referral to External Agencies

- Where concerns relate to child safeguarding, criminal conduct, or serious risk, the matter may be referred to external statutory bodies (e.g., LADO, Police, Ofsted, Local Authority).

3. Investigation
 - Investigations will be conducted promptly, impartially and confidentially.
 - An investigator (internal or external) may be appointed.
4. Feedback
 - Wherever possible, the person raising the concern will be informed of progress and outcome, while maintaining confidentiality.
5. Records
 - Records of concerns and outcomes will be maintained securely.

Confidential and Anonymous Concerns

Confidential concerns will be handled with every effort to protect identity. Anonymous concerns may be considered, but anonymity may limit the School's ability to investigate thoroughly.

Decisions on investigating anonymous concerns will be made based on:

- Seriousness of the issue
- Credibility
- Likelihood of verifying information independently

External Reporting

If a concern has not been addressed appropriately internally, individuals may report to an external body, including:

- Local Authority Designated Officer (LADO)
- Ofsted
- Department for Education
- Relevant regulatory or law enforcement body

Confidentiality and Data Protection

Information collected under this policy will be handled in line with the School's Data Protection Policy, and in compliance with the UK GDPR and Data Protection Act 2018.

Monitoring and Reporting

The Headteacher will provide regular, anonymised reports to Governors/Directors on whistleblowing activity, actions taken and outcomes.

Review

This policy will be reviewed annually, or more frequently if required by changes in legislation, regulation or practice.

Useful Contacts

Role	Contact
Headteacher	emily.hollis@elmleydrayschool.co.uk
Chair of Governors	ian.wyles@elmleydrayschool.co.uk
Director	hayley.furnell@elmleydrayschool.co.uk
Public Concern at Work	whistle@pcaw.org.uk 020 7404 6609
Ofsted Whistleblowing	whistleblowing@ofsted.gov.uk
LADO Education Safeguarding Advisory Service (LESAS)	lesasenquiries@kent.gov.uk Local Authority Designated Officer (LADO) - Kent Safeguarding Children Multi-Agency Partnership

Version control - Approval and review

Version No.	Approved By	Approval Date	Main Change	Review Period
1	Hayley Furnell	September 2024	Initial policy approved	Annually
2.0	Hayley Furnell	January 2026	Updated and made independent of staff handbook	Annually



Reviewed by Hayley Furnell, Director,
on behalf of the Elmley Dray School

Dated: January 2026
Next review: January 2027