Twin Oaks Primary School Whistleblowing Policy

The school where everyone is valued and all succeed.

Governing Body with Responsibility	Full Governing Body
Agreed by Governors on	8th June 2026
Chair's Signature	Samantha Hoyer
Staff Member Responsible for Review	Headteacher
Date for Review	June 2028

Contents

1. Aims 2
2. Legislation 2
3. Definition of whistle-blowing 2
4. Procedure for staff to raise a whistle-blowing concern 3
5. School procedure for responding to a whistle-blowing concern 3
6. Malicious or vexatious allegations 5
7. Escalating concerns 5
8. Approval 5
9. Links with other policies 5

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1. Aims

This policy aims to:

- Encourage individuals affected to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated, and that their confidentiality will be respected
- Let all staff in the school know how to raise concerns about potential wrongdoing in or by the school.
- Set clear procedures for how the school will respond to such concerns, ensuring that staff know that concerns raised by whistle-blowers will be responded to properly and fairly
- Let all staff know the protection available to them if they raise a whistle-blowing concern
- Assure staff that they will not be victimised for raising a legitimate concern through the steps set out in the policy, even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue – see section 6 below)
- Ensure staff know that they are protected by law and that a non-disclosure agreement, confidentiality clause or 'gagging clause' in a settlement agreement or employment contract cannot stop them from making a protected disclosure in the public interest

This policy does not form part of any employee's contract of employment and may be amended at any time.

This policy applies to all employees of the school. Other workers, including consultants, contractors, agency staff and those on work placements, are also encouraged to use it.

2. Legislation

This policy has been written in line with government guidance on whistle-blowing. We have also taken into account the Public Interest Disclosure Act 1998.

3. Definition of whistle-blowing

Whistle-blowing covers concerns made that report wrongdoing that is "in the public interest". Examples of whistle-blowing include (but are not limited to):

- Criminal offences, such as fraud or corruption
- Pupils' or staff health and safety being put in danger

- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Sexual harassment (in effect from 6 April 2026)
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment

A whistle-blower is a person who raises a genuine concern relating to the above. These concerns should be reported under this policy.

Not all concerns about the school count as whistle-blowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistle-blowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance.

If a complaint involves personal circumstances alongside wider concerns (e.g. pupil health and safety), the staff member must consult with the headteacher to decide the most appropriate reporting procedure.

When staff have a concern, they should consider whether it would be better to follow our staff grievance or complaints procedures.

Protect (formerly Public Concern at Work) has:

- Further guidance on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure
- A free and confidential advice line

4. Procedure for staff to raise a whistle-blowing concern

4.1 When to raise a concern

Staff should consider the examples in section 3 when deciding whether their concern is of a whistle-blowing nature. Consider whether the incident(s) was illegal, breached statutory or school procedures, put people in danger or was an attempt to cover any such activity up.

4.2 Who to report to

School-based staff should report their concern to the headteacher. If the concern is about the headteacher, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the Chair of Governors. The chair can be contacted via the clerk mleite@twinoaks.lewisham.sch.uk

4.3 How to raise the concern

Concerns should be made in writing wherever possible. They should include the names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter.

Staff are encouraged to give their name when reporting an allegation, to help the school take the investigation further. However, a complainant's right to anonymity will be respected.

A proper investigation may be more difficult or impossible if further information cannot be obtained from the staff member. This will also make it more difficult to establish whether any allegations are credible.

Staff who are concerned about possible reprisals if their identity is revealed can consult with the Local Authority by using the Council's reporting line whistleblowing@lewisham.gov.uk or the 24-hour Freephone hotline at 0800 0850119.

5. School procedure for responding to a whistle-blowing concern

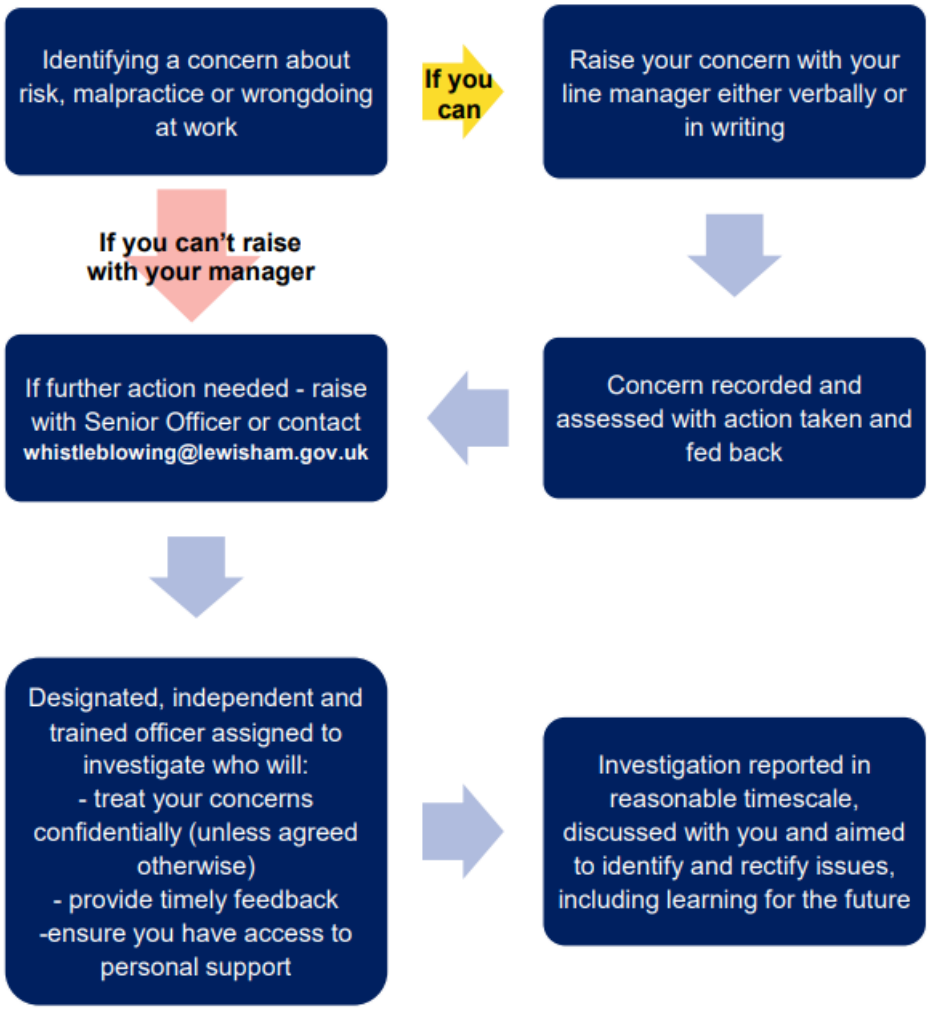
5.1 Investigating the concern

When a concern is received by the headteacher – referred to from here as the 'recipient' – they will:

- Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative
- Get as much detail as possible about the concern at this meeting and record the information. If it becomes apparent that the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure
- Reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken (see section 6 of this policy)
- Establish whether there is sufficient cause for concern to warrant further investigation. If there is, the school will follow the procedures set put in Lewisham's Whistleblowing and speaking up policy

  https://lewisham.gov.uk/mayorandcouncil/complaints-and-feedback/whistleblowing

Process Flowchart



If a staff member is not satisfied with the way in which their concern has been handled, they can raise their concerns with the Chair of governors, or the local authority via the Director of Law, Governance, and Elections or the Chief Executive. The chair of governors can be contacted via the clerk mleite@twinoaks.lewisham.sch.uk

6. Malicious or vexatious allegations

Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made with the reasonable belief that the disclosure is in the public interest and meets the definition of whistle-blowing as listed in section 3, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern.

If, however, an allegation is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the person making the allegation.

7. Escalating concerns

The school encourages staff to raise their concerns internally, in line with section 4 of this policy, but recognises that staff may feel the need to report concerns to the local authority. A list of contact's is in the Lewisham Whistleblowing and speaking up policy here https://lewisham.gov.uk/mayorandcouncil/complaints-and-feedback/whistleblowing

It is advised that staff seek advice before reporting a concern to an external body. The Protect advice line, linked to in section 3 of this policy, can help staff when deciding whether to raise the concern to an external party.

8. Approval

This policy will be reviewed every 2 years by the Full Governing body.

9. Links with other policies

This policy links with our policies on:

- Staff grievance policy
- Complaints procedure
- Safeguarding policy
- Disciplinary policy