



Old Basford School

CONFIDENTIAL REPORTING CODE (WHISTLE BLOWING PROCEDURE)

DOCUMENT ORIGINS			
Organisation	Old Basford School	Version date	Autumn Term 2025
Owner	Laura Duffin	Approved by (If applicable)	Governing Body
Next review date	Autumn Term 2026	Approval date	14 th October 2025

DOCUMENT VERSION HISTORY		
Revision date	Author of changes	Summary of changes
Autumn Term 2025	Laura Duffin	Reviewed against latest NCC people management policy and by Nicola Sokala, SAAF HR Consultant. Changes made include; additional information within the introduction referring KCSIE 2025, reporting procedures re: concerns about the headteacher
Autumn Term 2024	Laura Duffin	No changes made
Autumn Term 2023	Laura Duffin	No changes made
Autumn Term 2022	Laura Duffin	No changes made

1. Introduction

This procedure identifies the kind of complaints covered by the Whistle Blowing Procedure. It outlines who complaints should be raised with and their responsibilities. The procedure also aims to reassure those raising a complaint that they will not suffer detriment.

KCSIE 2025 states what school or college staff should do if they have concerns about safeguarding practices within the school or college:

- 72. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or college's safeguarding provision and know that such concerns will be taken seriously by the senior leadership team.
- 73. Appropriate whistleblowing procedures should be put in place for such concerns to be raised with the school or college's senior leadership team.
- 74. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them

- Making an online referral to Local Authority Designated Officer (LADO)
<https://www.nottinghamcity.gov.uk/information-for-residents/children-and-families/safeguarding/safeguarding-children-partnership/lado/>

Email LADO@nottinghamcity.gov.uk

- general advice on whistleblowing can be found at <https://www.gov.uk/whistleblowing>
- the NSPCC Whistleblowing Advice Line is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – and the line is available from 08:00 to 20:00 Monday to Friday, and 09:00 to 18:00 at weekends. The email address is help@nspcc.org.uk

It is the clear responsibility of all members of staff and volunteers to act on any concerns or information that give them concern about the safety and wellbeing of a child or children arising from circumstances or events out of school. Equally it is the responsibility of all members of staff and volunteers to act on any concerns or information that give them concern about the safety and wellbeing of a child or children within the school or within the care of the school.

Such a concern in a safeguarding context may be related to:

- the conduct or behaviour of a member of staff or volunteer towards an individual child or children.
- information that suggests a member of staff or volunteer is unsuitable to work with children.
- belief that the Designated Safeguarding Lead (DSL), senior leaders or governors have failed to take appropriate action in response to safeguarding concerns raised

This policy aims to:

- encourage individuals affected to report suspected concerns and 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 Old Basford School know how to raise concerns about potential wrongdoing
- set clear procedures for how Old Basford School will respond to such concerns
- let all staff know the protection available to them if they raise a whistleblowing 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)

2. Preamble

- 2.1 Employees are often the first to realise that there may be something seriously wrong within the Academy. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Academy. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice. This code encourages employees to raise such concerns using the internal mechanisms set out below.
- 2.2 The Academy is committed to the highest possible standards of openness, probity and accountability. We expect employees, and others that we deal with, who have serious concerns about any aspects of the Academy's work to come forward and voice those concerns.
- 2.3 This Procedure makes it clear that employees can raise concerns without fear of victimisation, subsequent discrimination or disadvantage. The Academy is committed to support employees who make a disclosure. The Whistle Blowing Procedure is intended to encourage and enable employees to raise serious concerns within the Academy rather than overlooking a problem or 'blowing the whistle' outside.
- 2.4 The Procedure applies to all employees and those contractors working for the Academy-on-Academy premises, for example, agency staff, builders, drivers etc. It also covers suppliers and those providing services under a contract with the Academy in their own premises.
- 2.5 This procedure should be used to raise serious concerns within the Academy, which are in the public interest where an individual genuinely feels there is evidence of malpractice, impropriety or wrongdoing within the Academy or by others acting on behalf of the Academy. This procedure is not intended to replace existing complaint procedures or normal work communication channels for routine issues that may arise from day-to-day business. Other complaints procedures should be considered before making a whistle blowing complaint. The Whistle Blowing policy is not an appeal mechanism for other procedures.
- 2.6 This code is a policy of the local authority, approved by representatives of the recognised trade unions and has been agreed by the governing body of this school. This Procedure does not form a collective agreement and does not form part of employees' contracts of employment.

3. Aims and scope of this procedure

3.1 The Whistle Blowing Procedure aims to:

- Encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice
- Provide avenues for you to raise those concerns and receive feedback on any action taken
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- Provide protection from possible reprisals or victimisation, where the person making the disclosure believes that the information available tends to show malpractice and the disclosure is made to the appropriate person or body.

3.2 There are existing procedures in place to enable you to lodge a grievance relating to your own employment or raise other concerns. The Whistle Blowing Procedure is intended to cover major concerns that fall outside the scope of other procedures or where a procedure exists but you believe management may be involved or are not taking an issue raised seriously. Issues that could be covered by the Whistle Blowing Procedure include, but not limited to:

- Conduct which is an offence or a breach of law (Criminal offences and failures to comply with legal obligations)
- Disclosures related to miscarriages of justice
- Health and safety risks, including risks to the public as well as other employees
- Damage to the environment

- The unauthorised use of public funds
- Possible fraud and corruption
- Sexual or physical abuse of clients
- Other unethical conduct
- Institutional racism, or;
- Action to conceal any of the above.

3.3 Thus, any serious concerns that you have about any aspect of service provision or the conduct of members of the Academy or others acting on behalf of the Academy can be reported under the Whistle Blowing Procedure. This may be about something that:

- Makes you feel uncomfortable in terms of known standards, your experience or the standards you believe the Academy subscribes to; or
- Is against the Academy's Standing Orders and policies; or
- Falls below established standards of practice; or
- Amounts to improper conduct.

3.4 Where other procedures exist, they should be considered before making a whistle blowing complaint. For example:

- Complaints about your employment - these should be dealt with through our Grievance Procedure.
- Concerns about the sexual or physical abuse of children – such concerns should be referred through the Child Protection Procedure.
- Customer complaints about our services - these are dealt with through our Complaints Procedure.

Obviously, as with any other citizen, you may also report apparent criminality to the police in parallel with any of the above procedures. If the police do become involved in an investigation their requirements of the academy are likely to take precedence over the above procedures and this whistleblowing procedure.

4. Safeguards and support

4.1 The Academy is committed to the highest standards of openness, probity and accountability. The Academy aims to promote a culture in which employees feel they can raise genuine concerns without fear of subsequent victimisation, discrimination or disadvantage.

4.2 The Academy will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect and support you.

4.3 Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that already affect you.

4.4 Subject to any legal constraints the person to whom you made the complaint or their nominated representative will keep you informed of progress in relation to your complaint, the investigation etc.

5. Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. However, you should appreciate that the investigation process may reveal the source of information and a statement by you may be required as part of the evidence. At the appropriate time, you may need to come forward as a witness.

6. Anonymous allegations

6.1 This procedure encourages you to put your name to your allegation whenever possible. We very much hope that the assurances we give in this policy will encourage you to disclose your identity to those who need to know it.

6.2 Concerns expressed anonymously are less powerful and much more difficult to investigate but will be considered at the discretion of the Governing Body.

6.3 In exercising this discretion, the factors to be taken into account would include:

- The seriousness of the issues raised;
- The credibility of the concern;
- The likelihood of confirming the allegation from attributable sources;
- The level of detail given to allow the complaint to be investigated.

7. Untrue allegations

If you make an allegation, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

8. How to raise a concern

8.1 The earlier you express the concern and the higher the level of detail the easier it is to take action.

8.2 As a first step, you should normally raise concerns with your immediate manager or the headteacher. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example:

- If you believe that management is involved or the issue is sufficiently serious, you should approach the Governing Body of the academy;
- If your concern relates to matters involving the Headteacher you should raise your concern with the Chair of Governors;
- If your concern relates to matters involving the Governing Body you should raise your concern with the Monitoring Officer (Head Teacher);
- In the case of concerns relating to the Local Authority you should raise your concerns with the Monitoring Officer (Head Teacher).

8.3 Line Managers and the Governing Body receiving complaints (including school related matters) must inform the Monitoring Officer (Head Teacher) so that the complaint can be recorded.

8.4 If you wish to raise a concern relating to something in the Monitoring Officer's area of work then this should be addressed to the Chair of Governors.

8.5 If you wish to raise a concern about a third party, e.g. a contractor, you should either raise it with the Governing Body or the third party themselves.

8.6 Concerns may be raised verbally but are best raised in writing. When making a written disclosure the following format is suggested:

- Your name and contact details
- The background and history of the concern (giving relevant dates, names, places etc);
- The reason why you are particularly concerned about the situation.
- Explain what evidence exists or how evidence of the complaint can be obtained.
- Provide details of who you have spoken to so far about your concerns.
- The fact that you are raising this concern as a Whistle blowing complaint.

8.7 When raising a concern, you will not be expected to provide proof beyond reasonable doubt of an allegation, but you will need to be able to demonstrate that there are reasonable grounds for the concerns raised. Where possible notes should be kept of what you have seen, heard or felt. Notes should be dated and copies of all relevant information kept.

- 8.8 You may wish to obtain advice/guidance on how to pursue matters of concern or generally on the whistle blowing process. Advice can be obtained from the monitoring officer (headteacher) or Governing Body.
- 8.9 You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns but do be mindful of confidentiality issues.
- 8.10 You may invite your trade union, professional/association representative or a work colleague to be present during any meetings or interviews in connection with the concerns you have raised.
- 8.11 You need to be aware that your colleagues are bound by the same obligations as you relating to confidential information. If you share confidential information with union reps, professional associations or others with a view to using this procedure you will need to be careful that the confidential information is not used inappropriately. The Public Interest Disclosure Act gives protection only where certain information is disclosed in the course of obtaining legal advice. Therefore, when seeking such advice, you should ensure that confidential information is not passed on to third parties. Check with the monitoring officer (headteacher) about this issue.

9. Whistle blowing complaints received by managers

- 9.1 When receiving complaints, managers should always consider the possibility that they might be presented with a whistle blowing issue and should remember that whistle blowing complaints have to be dealt with via a separate process.
- 9.2 Line managers who are made aware of possible whistle blowing complaints must in the first place seek advice from the Monitoring Officer so that the complaint can be considered and a decision made on how to proceed.
- 9.3 All whistle blowing complaints will be recorded and monitored by the Monitoring Officer.

10. How the Academy will respond

- 10.1 Line managers receiving complaints or who are made aware of such complaints must inform the Monitoring officer so that the complaint can be recorded:
- 10.2 Within ten working days of a concern being raised, the person receiving the complaint (i.e. your line manager or the Monitoring Officer or their designated representative) will write to you:
- Acknowledging that the concern has been received
 - Indicating how we propose to deal with the matter
 - Giving an estimate of how long it will take to provide a final response
 - Telling you whether any initial enquiries have been made
 - Supplying you with information on colleague support mechanisms, and
 - Telling you whether further investigations will take place and if not, why not.
- 10.3 Where appropriate, the matters raised may:
- Be investigated by management, an appropriately trained investigator, internal audit, or through another appropriate procedure
 - Be referred to the police
 - Be referred to the external auditor
 - Form the subject of an independent inquiry.
- 10.4 In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle, which the Academy will have in mind, is the public interest but will balance this with its duty of care to its employees. Concerns or allegations that fall within

the scope of other specific procedures (for example, child protection or discrimination issues) will normally be referred for consideration under those procedures.

10.5 Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.

10.6 The amount of contact between the officers considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the Academy will seek further information from you and throughout any investigation will try to keep you informed of what is happening, subject to any legal constraints.

10.7 Where any meeting is arranged, off-site if you so wish, you can be accompanied by a union or professional association representative or work colleague.

10.8 The Academy will take steps to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings the Academy will arrange for you to receive advice about the procedure.

10.9 The Academy accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints your line manager or the Monitoring Officer or their designated representative will inform you of the outcome of any investigation at the end of the case.

11. The Responsible Officer

The Monitoring Officer (currently the Head Teacher) has overall responsibility for the maintenance and operation of this procedure and will inform the governing body of any recommended changes. The Monitoring Officer maintains a record of concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report on an annual basis to the Governing Body

12. How the matter can be taken further

12.1 If you are unsure about whether or not to follow the Academy's Whistle Blowing Policy, or you want further independent advice, you may contact Protect (formally called Public Concern at Work). This is a charity, completely independent of the Academy, which specialises in providing free and confidential legal advice on how to raise a concern about serious malpractice at work. Protect will also help to advise you on whether a circumstance can be properly reported to an additional outside body such as the Police.

Protect can be contacted as follows - Telephone: 020 3117 2520; Fax: 020 7403 8823; Email whistle@protect-advice.org.uk; Website: <https://protect-advice.org.uk>

12.2 In certain circumstances the Public Interest Disclosure Act 1998 (PIDA) provides protection to employees who make disclosures outside the organisation. We hope you will be satisfied with any action we take. If you are not and want to take the matter outside the Academy you could contact:

- Your Trade Union
- Your local Citizens Advice Bureau
- Relevant professional bodies or regulatory organisations
- A relevant voluntary organisation
- The Police

12.3 In addition, an employee may consider a disclosure to other external bodies but only if certain strict conditions are met.

12.4 Under the 1998 act, employees making "protected disclosures" are protected from detrimental action, unfair dismissal and redundancy, and can complain to any employment tribunal.

- 12.5 The Procedure additionally covers any conduct not included above which is of an unethical nature. In these circumstances the Academy undertakes to provide the same protection as set out in paragraph 4 above. However, you would not necessarily be protected by PIDA and you may want to take separate advice on that, for example by contacting Protect.
- 12.6 If you do take the matter outside the Academy, you should ensure that you do not disclose confidential information. Check with the Monitoring Officer or the Chair of Governors.



Whistleblowing Procedure Flowchart

(A copy of the OBS Whistleblowing Policy can be obtained from the staff share area in:
Z Drive\Policies\SCHOOL POLICIES\OBS WHISTLEBLOWING POLICY or from our school website
www.oldbasford.co.uk under key information\policies)

Worried that something is wrong or dangerous happening at OBS e.g. safety risks, malpractice, fraud or wrongdoing?



Stage 1

Raise your concern with your line manager – either verbally or in writing.

(if you believe management is involved or is sufficiently serious – inform the governing body)

(if your concern relates to matters involving the governing body – inform the head teacher)

(if your concerns relate to matters involving the local authority – inform the head teacher)



Once a concern is reported the person receiving the complaint will write to you within 10 working days detailing how your concern will be dealt with, proposed timeline for any further investigations



The reported concern will be assessed and appropriate action considered (e.g. investigated by management or independent body, refer to police etc). The aim will be to provide feedback or resolution at each stage. This may take longer depending on complexity and level of information provided.