



FARNEY CLOSE SCHOOL

WHISTLEBLOWING POLICY AND PROCEDURE

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Last Reviewed	July 2026
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Approval Level	☐ Governing Body ☒ Principal to Determine
Signed	
Role	Principal
Date Approved	07/09/26

Safeguarding statement

Farney Close School acknowledges its duty of care to safeguard, protect and promote the welfare of children and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and best practice. This knowledge has informed the writing and review of this policy.

Policy

Introduction

From time to time, we all have concerns about what is happening at work. Usually, these concerns are easily resolved. However, sometimes it can be difficult to know what to do, particularly if this is having a negative impact on you or if you become aware of unsafe, illegal, unethical or negligent conduct.

Farney Close School is committed to achieving the highest possible standards of service, safeguarding, accountability and ethics. This Whistleblowing Policy has been developed so that you know how to raise a concern in the right way at an early stage and so that, when you follow these guidelines, your concern is dealt with properly and appropriately, and you feel supported and protected where applicable.

This procedure is not a substitute for normal line management processes but an addition to them. It is not a substitute or alternative for existing procedures such as Grievance, Disciplinary, Safeguarding and Child Protection. Where a concern is about a child being at risk of harm, safeguarding procedures must be followed immediately and this policy must not delay urgent action.

This policy should be used for concerns where the interests of others, pupils, staff, visitors, the school or the wider public interest may be at risk. If you are in doubt, it is better to speak up so the issue can be addressed.

Aims of Policy

- To encourage staff and workers to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected as far as possible.
- To provide staff and workers with clear guidance as to how to raise concerns.
- To reassure staff and workers that they should be able to raise genuine concerns without fear of reprisals, even if those concerns turn out to be mistaken.
- To support the School safeguarding culture, particularly given the vulnerability of children and young people with special educational needs and disabilities.
- To ensure that concerns are recorded, managed and retained in line with UK GDPR, the Data Protection Act 2018 and the School records retention arrangements.

This policy does not form part of an employee's contract of employment and is not intended to have contractual effect. It provides guidance for all individuals working in the School, including employees, workers, agency staff, volunteers, governors, consultants, contractors and students on placement. The School will follow this procedure wherever reasonably practicable, but may adapt the process where necessary due to safeguarding, legal, regulatory, operational or confidentiality requirements. The School reserves the right to amend its content at any time, subject to the appropriate approval process.

a. What is Whistleblowing

Whistleblowing is the disclosure of information which relates to suspected wrongdoing, malpractice or dangers at work. Legally, this may be known as making a protected disclosure where a worker reasonably believes that the information tends to show wrongdoing and that disclosure is in the public interest.

A concern may fall within one of the following categories, but if it does not, or if you are not sure, and you have a genuine concern, you should seek advice from the Principal, Designated Safeguarding Lead, Chair of Governors or Governor with responsibility for Whistleblowing/Safeguarding before you report it under this policy.

- Criminal activity.
- Danger to health and safety.
- Failure to comply with any legal or professional obligation or regulatory requirement.
- Safeguarding failures, child protection concerns, abuse, neglect, exploitation or unsafe practice.
- Inappropriate conduct by staff, volunteers, contractors, governors or senior leaders.
- Unsafe care, unsafe supervision, inappropriate restraint or restrictive practice.
- Damage to the environment.
- Financial fraud or mismanagement.
- Breach of a code of practice or internal policy.
- Unauthorised or unlawful disclosure, use or loss of confidential or personal information.
- Conduct likely to damage the School's reputation or undermine safeguarding culture.
- An attempt to conceal or cover up any of the above.

b. Protection and Support

Staff and workers must not suffer any detrimental treatment as a result of raising a genuine concern. This includes dismissal, disciplinary action, threats, bullying, harassment, discrimination, reduction in hours, denial of training or promotion opportunities, or other unfavourable treatment connected with raising a concern.

- If a member of staff believes they have suffered such treatment, they should inform the Principal immediately. If the concern involves the Principal, they should inform the Chair of Governors or Governor with responsibility for Whistleblowing/Safeguarding.
- If the matter is not remedied, the member of staff may raise it formally using the School's Grievance Policy or seek independent advice.
- Staff must not threaten, victimise or retaliate against whistleblowers in any way. Anyone involved in such conduct may be subject to disciplinary action.
- All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger, safeguarding concern or wrongdoing.

SEND-specific safeguarding note

Children and young people with SEND may be particularly vulnerable to abuse, neglect, exploitation, communication barriers, unsafe care or poor professional practice. Staff are expected to report concerns immediately where any pupil may be placed at risk.

c. Confidentiality

Whilst we hope that staff will feel able to voice whistleblowing concerns openly under this policy, we recognise that there may be circumstances where a member of staff may wish to raise a concern confidentially. The School will endeavour to protect your identity and will not disclose it without first discussing it with you wherever possible.

There may be cases where it is not possible to protect your identity, for example where your evidence is needed as part of a child protection investigation, regulatory referral, police investigation, disciplinary process or court proceedings. If this is the case, then we will inform you how we are going to proceed, unless doing so compromises safeguarding, legal or regulatory action.

The School does not encourage anonymous disclosures because proper investigation may be more difficult or impossible if the School cannot obtain further information. However, anonymous concerns will still be considered and assessed according to seriousness, credibility, risk and available information. Whistleblowers who are concerned about possible reprisals should contact the Principal, Chair of Governors or Governor with responsibility for Whistleblowing/Safeguarding so that appropriate measures can be considered.

d. Data Protection and Record Keeping

The School will process personal data obtained through whistleblowing disclosures in accordance with UK GDPR, the Data Protection Act 2018 and the School's Data Protection Policy. Information will be used only where necessary to assess and investigate concerns, meet safeguarding duties, comply with legal or regulatory obligations, protect individuals from harm, manage employment processes and maintain appropriate records.

- Records will be stored securely and access will be restricted to those who need the information.
- Information will be shared only where necessary and lawful, including for safeguarding, legal, regulatory, disciplinary or law enforcement purposes.
- Records will be retained only for as long as necessary and in accordance with the School's records retention schedule.
- Subject access requests will be handled carefully and may require redaction or application of exemptions to protect whistleblowers, witnesses, children, investigations and third-party rights.

Procedure

a. How to Raise a Concern

You can raise concerns under this policy orally or in writing. If you would like to raise your concern in confidence, please let us know so that appropriate arrangements can be made. You do not need to prove your concern before reporting it, but you should provide as much information as you reasonably can, including dates, people involved, locations, supporting documents and whether any child or adult is at immediate risk.

Step 1

If you are concerned about something at work, we hope you will feel able to raise it first with your line manager, unless this is inappropriate due to the nature of the concern.

Step 2

If you feel unable to raise the matter with your line manager, for whatever reason, please take it to the Principal. If the concern relates to safeguarding, you may also raise it directly with the Designated Safeguarding Lead or Deputy DSL in accordance with the School's Safeguarding and Child Protection Policy.

Step 3

If any of the above staff are the subject of your concern, or if you believe the concern has not been handled appropriately, please refer it to the Chair of Governors or the Governor with responsibility for Whistleblowing/Safeguarding.

Step 4

Where internal reporting is inappropriate, unsuccessful, compromised, or where there is an immediate safeguarding risk, you may report to an appropriate external body, including the LADO, children's social care, police, Ofsted, NSPCC, DfE, ICO or another prescribed person as appropriate.

Once you have reported your concern, the person that you reported it to will take advice where necessary to assess what action to take. Where practicable, the School will acknowledge receipt of the concern within five working days. A written summary of your concern may be prepared and you will be invited to confirm its accuracy. A refusal or inability to sign will not prevent the School from considering or investigating the concern.

The School will tell you, where appropriate and lawful, how it proposes to deal with the situation and the expected next steps or timescale. Any action taken will depend upon the nature, urgency and seriousness of the concern. The matter may be passed to the most relevant person or body to investigate and report back.

We will try to handle any matter you raise with us fairly and properly. We will give you as much feedback as we can, however, we may not be able to tell you the precise action we take where this would infringe a duty of confidence, safeguarding

requirement, legal obligation, data protection requirement or the rights of another person.

If you wish, you may ask for a meeting to raise concerns. If you are a member of a union, you can seek advice and support at any stage. You may also bring a work colleague or trade union representative to a meeting where reasonable and appropriate.

We will not tolerate the victimisation, harassment, bullying, discrimination or disadvantage of anyone raising a genuine concern. Equally, the School will not tolerate anyone who knowingly or maliciously raises a concern they know to be untrue.

Workers may be protected under the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998, when they make a protected disclosure. Whilst the School encourages staff to use this policy wherever appropriate, legal protection may also apply to qualifying disclosures made through other lawful channels.

b. Safeguarding Concerns

Nothing in this policy should delay immediate action to protect a child. Any concern that a child is suffering, or is likely to suffer, harm must be reported immediately in accordance with the School's Safeguarding and Child Protection Policy.

Whistleblowing may be used where safeguarding concerns are not being taken seriously, where concerns involve senior leaders, where there are concerns about unsafe organisational practice or safeguarding culture, or where the normal safeguarding procedure is compromised.

Where appropriate, safeguarding concerns may be reported to the Designated Safeguarding Lead, Deputy DSL, Chair of Governors, Governor responsible for Safeguarding, Local Authority Designated Officer, children's social care, police, Ofsted, DfE or the NSPCC Whistleblowing Advice Line.

c. External Reporting

This policy should reassure you that it is safe and accepted to raise genuine concerns internally. However, we recognise that there are circumstances where you can properly report matters to outside bodies, such as regulatory bodies, prescribed persons, safeguarding agencies or the police. You should consider seeking independent advice if you are unsure.

- Protect, independent whistleblowing charity: 020 3117 2520 or whistle@protect-advice.org.uk
- NSPCC Whistleblowing Advice Line: 0800 028 0285 or help@nspcc.org.uk.
- Your trade union or professional association, if you are a member.
- Local Authority Designated Officer, children's social care, police, Ofsted, Department for Education, Information Commissioner's Office or Health and Safety Executive where appropriate to the concern.

You should take care not to divulge confidential information unnecessarily. However, confidentiality duties do not prevent lawful disclosures made to protect children, prevent serious harm, comply with legal duties or make a protected disclosure through an appropriate route.

d. Contacts

Contact	Name / role	Details
Principal	Sara Hack	shack@farneyclose.co.uk/ telephone
Chair of Governors	Philip Hunt	phunt@farneyclose.co.uk/ telephone
Governor with Responsibility for Whistleblowing	Philip Hunt	phunt@farneyclose.co.uk/ telephone
Governor with Responsibility for Safeguarding	Zillah Webb	zwebb@farneyclose.co.uk/ telephone
Designated Safeguarding Lead	Sara Hack	Sara.hack@farneyclose.co.uk
Deputy DSL(s)	Becky Clements Dawn Morgan	bclements@farneyclose.co.uk/ dmorgan@farneyclose.co.uk
Local Authority Designated Officer	West Sussex LADO	033 022 26450/ LADO@westsussex.gov.uk
Children's social care / MASH	Integrated Front Door (IFD) Team	01403 229900/ MASH@westsussex.gov.uk
Protect, independent whistleblowing charity		020 3117 2520 / whistle@protect-advice.org.uk
NSPCC Whistleblowing Advice Line		0800 028 0285 / help@nspcc.org.uk
Ofsted / DfE		Use current published reporting route
Information Commissioner's Office		www.ico.org.uk
Emergency services		999 in an emergency / 101 for non-emergency police matters

e. Monitoring and Review

The Governing Body will monitor the effectiveness of this policy. Anonymised information about whistleblowing concerns, themes, safeguarding implications, response times, lessons learned and actions taken may be reported to governors for

oversight. This must be done in a way that preserves confidentiality and complies with data protection requirements.

This policy will be reviewed at least annually, or sooner if there are changes to legislation, statutory guidance, safeguarding practice, local procedures or School governance arrangements.

Version	Date	Summary of Change	Approved By
1.0	June 2019	Original policy	Principal
2.0	June 2025	Scheduled review	Principal
2.1	July 2026	Original policy retained and updated for whistleblowing law, ACAS best practice, safeguarding/SEND, UK GDPR and governance oversight	Principal