LONGPARISH
Church of England
Primary School

September 2026 Procedure for Protected Disclosures ("Whistleblowing") Policy,

incorporating all changes from the Hampshire Education People Services V2 model policy.

Procedure for Protected Disclosures ("Whistleblowing") Policy

Policy Adopted by the Governing Board – September 2026

School Governing Bodies – Public Interest Disclosure Act 1998

Introduction

1. This procedure is intended to operate in accordance with the provisions of the Public Interest Disclosure Act 1998 (as amended) (hereafter known as "the Act"). The Act gives protection to staff and workers who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties. The matters that come within scope of the Act and this procedure are set out in Step 2 of the procedure below.

2. The Whistleblowing Procedure has been developed for use in maintained schools and can also be adopted by, and used in, academy schools. It is intended to enable staff to report wrongdoing in the school where it would be in the public interest to do so. The wrongdoing has to be such as to potentially affect the general public, rather than simply being a complaint of an individual nature, such as a personal grievance, which is not normally covered under whistleblowing law. Individual personal grievances should normally be dealt with through other internal school procedures.

3. The Whistleblowing Procedure provides for matters to be referred externally where necessary, ultimately to a prescribed person (see Step 5 below). However, the procedure encourages staff to raise concerns initially within the school as a first priority rather than making a disclosure outside the school. In the vast majority of cases this will enable matters to be dealt with more efficiently and speedily.

4. The Act applies to all workers as well as staff. This procedure applies to all teaching and support staff, whether employed by the County Council or directly by the school, external contractors providing services on behalf of the school or the County Council, teacher trainees and other trainees, volunteers and any other individuals who work for or provide services on behalf of the school. These individuals are collectively referred to as staff members throughout this procedure.

Principles

5. The Governing Body will treat all disclosures made under this procedure very seriously and allegations about such matters will be dealt with promptly and with appropriate confidentiality.

6. The procedure gives protection from victimisation, discrimination or disadvantage to staff who make a disclosure in the public interest. This protection applies where any detriment arises from an act or failure to act either by the employer or by a fellow worker. The procedure also ensures that the person making the disclosure receives an appropriate response and understands how the matter may be pursued outside the school if necessary.

7. This procedure should not be confused with grievance procedures or other employment-related processes available to staff. It is designed to deal with concerns that are in the public interest and therefore excludes matters more appropriately addressed through other procedures.

Time Limits

8. There are no time limits on raising concerns under this procedure, although concerns should be raised at the earliest opportunity. Any timescales within the procedure are intended to ensure prompt handling of disclosures. Investigations themselves are not time-limited but will be completed as quickly as possible.

Representation

9. Staff are entitled to be accompanied by a trade union representative, professional association representative or work colleague at any meeting or interview held in relation to a disclosure under this procedure.

Unfounded or Improperly Made Allegations

10. If an allegation is unfounded or unsubstantiated but the staff member made the allegation honestly and in the reasonable belief that it was in the public interest, no action will be taken against them.

11. If an allegation is found to have been made falsely, maliciously, frivolously or for personal gain, the individual making the allegation may be subject to disciplinary action. Care should be taken when making such determinations, as some parts of an allegation may be exaggerated whilst containing elements that are true.

Model Procedure

Step 1 – Raising a Concern

12. Concerns should initially be raised with the staff member's immediate line manager. If the staff member believes the manager is involved in the malpractice, concerns may be raised with a more senior member of staff, including the Headteacher. If it is not appropriate to raise the matter with the Headteacher, the staff member may approach the Chair of Governors. Where a matter cannot be raised within the school, it may be raised in accordance with Step 5 below. The relevant manager is encouraged to take advice from **Education People Services**, who may involve other Hampshire County Council departments or relevant external organisations where appropriate.

13. Within ten working days of a concern being raised, the person receiving it will acknowledge receipt in writing and indicate what initial steps will be taken. Where possible, an estimate will be given of the likely timescale for a final response.

14. Concerns may be raised orally or, preferably, in writing. Sufficient information should be provided, including dates, individuals involved and sources of information where known. Staff should be able to demonstrate reasonable grounds for their concerns.

15. Staff may choose to make disclosures anonymously. However, it may be important for the investigating manager to know the source of the information in order to carry out a full investigation. All disclosures will be treated confidentially and every effort will be made to preserve anonymity. The Act provides protection against victimisation for those making protected disclosures in good faith.

Step 2 – Determining Whether a Concern is a Protected Disclosure

16. Qualifying disclosures are disclosures of information where a staff member reasonably believes, and it is in the public interest, that one or more of the following is happening, has happened or is likely to happen:

1. a criminal offence (for example fraud, corruption, sexual or physical abuse of pupils or others);
2. a failure to comply with a legal obligation;
3. a miscarriage of justice;
4. a danger to the health or safety of any individual;
5. damage to the environment;
6. **sexual harassment**;

7. a deliberate attempt to conceal any of the above matters.

17. The recipient of the disclosure must determine whether it is a qualifying disclosure by considering:

8. whether factual information has been disclosed rather than opinion alone;
9. whether the individual believed the information indicated that one of the above matters had occurred, was occurring or was likely to occur; and
10. whether that belief was reasonable.

18. Where these criteria are met, the disclosure will qualify as a protected disclosure and the remainder of this procedure will apply. Where the criteria are not fully met but the disclosure has been made in good faith, the allegations should still be investigated and the individual protected from discrimination. If a disclosure is found to have been made for malicious purposes or personal gain, it may be dealt with under the disciplinary procedure. Guidance can be found in the **Manual of People Practice**.

Step 3 – Investigation

19. A preliminary investigation will be undertaken to establish whether the alleged act or omission could have occurred, be occurring or be likely to occur. The purpose at this stage is to establish facts and determine whether further investigation is required. Further guidance can be found in the **Manual of People Practice**.

20. Where allegations appear to have substance, a full internal investigation should be conducted. This may result in:

11. no case to answer;
12. disciplinary action against the individual concerned;
13. referral to Social Services, the Police or another appropriate organisation;
14. referral to the Counter Fraud Unit or other County Council departments (where applicable).

21. Where allegations are unfounded or unsubstantiated, no further action may be necessary. However, consideration should be given to whether any training or organisational learning is required.

22. If an allegation is found to have been made maliciously or for personal gain, it may be dealt with under the disciplinary procedure. Guidance can be found in the **Manual of People Practice**.

Step 4 – Communication

23. Subject to legal considerations and the rights of individuals involved, the person making the disclosure will be informed whether the matter is being taken forward and provided with a summary of how it is being addressed. Confidential details regarding any action taken against another individual will not be disclosed.

24. Wherever possible, communications will be handled sensitively and confidentially. Suitable arrangements for correspondence will be agreed with the person making the disclosure.

Step 5 – Taking the Matter Further

25. If a staff member believes their concerns have not been satisfactorily resolved, they may write to the Chair of Governors (if not already involved), setting out their concerns, actions taken to date and reasons for dissatisfaction.

26. Within ten working days, the Chair of Governors will acknowledge the concern, explain the next steps and provide an estimated timescale for a response. The Chair may establish a small panel of governors to investigate the matter where appropriate.

27. Where appropriate, the Chair of Governors should involve the relevant Diocese at an early stage.

28. If the matter cannot be satisfactorily resolved within the school, staff may escalate their concerns as outlined below.

Schools Where Hampshire County Council is the Employer

29. Concerns should be raised in writing with:

a. County Education Manager for the school

b. Director of Children's Services

c. Chief Executive of Hampshire County Council

30. These officers will follow a similar procedure and provide feedback to the staff member. Correspondence should be sent to:

Children's Services Department
Hampshire County Council
Elizabeth II Court West
The Castle
Winchester
SO23 8UG

Email: childrens.services@hants.gov.uk

31. If still dissatisfied, staff may raise appropriate concerns with:

15. an elected Member of Hampshire County Council;
16. the Local Government Ombudsman;
17. other bodies outlined below.

All Schools

32. Staff who remain dissatisfied may raise concerns with:

18. a relevant professional body or inspectorate, such as Ofsted or the Health and Safety Executive;
19. a prescribed person designated under the Act.

33. Staff can only make a disclosure to a prescribed person where they:

20. make the disclosure in good faith;
21. reasonably believe the information is substantially true; and
22. reasonably believe they are disclosing the matter to the appropriate person or body.

34. In raising concerns outside the school, staff must take care not to disclose unnecessary personal data or confidential information. Staff seeking advice from organisations such as Protect or Citizens Advice must still respect duties of confidentiality owed to the Governing Body.

Failure to Follow this Procedure

35. Any staff member who, without reasonable justification, raises concerns publicly, including with the media, without following the steps outlined in this procedure may be liable to disciplinary action.

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