



**WELLESLEY
PREP SCHOOL**

WHISTLEBLOWING POLICY AND PROCEDURE

2026-2027

This policy applies to all parts of Wellesley Prep School, including the Early Years Foundation Stage.

Updated: September 2026
Review: September 2027
Policy owner: Bursar
Approval: Governing Body

Document Control

Document title	Whistleblowing Policy and Procedure
Applies to	All parts of Wellesley Prep School, including EYFS
Policy owner	Bursar
Related documents	Safeguarding and Child Protection Policy; Staff Code of Conduct; Grievance Procedure; Disciplinary Procedure; Complaints Procedure; Anti-Fraud and Financial Controls; Health and Safety Policy; Data Protection Policy
Updated	September 2026
Review	September 2027, or earlier if required by changes in legislation, statutory guidance or School practice

1. Purpose and Commitment

Wellesley Prep School ("the School") is committed to conducting its affairs with honesty, integrity and openness. We want staff and others working at the School to feel able to raise genuine concerns about wrongdoing, malpractice, safeguarding or other serious matters without fear of suffering detriment or retaliation.

A culture in which concerns can be raised and addressed at an early stage is an important part of good governance, safeguarding and effective management. The School will take concerns raised under this policy seriously, consider them fairly and take appropriate action.

This policy is intended to support internal reporting wherever appropriate, while recognising that individuals may in some circumstances be entitled to make a protected disclosure to an external prescribed person, regulator, legal adviser or other appropriate body.

2. Scope

This policy applies to employees and, so far as appropriate, agency workers, contractors, consultants, volunteers, governors and others working at or for the School.

The statutory protection available under whistleblowing law depends on the individual's legal status and the circumstances of the disclosure. The School nevertheless encourages anyone covered by this policy to raise genuine concerns so that they can be considered and addressed.

This policy applies to concerns about matters connected with the School, including concerns arising from actions, omissions or practices within the School or by those working for or on behalf of it.

3. What Is Whistleblowing?

Whistleblowing is the disclosure of information about suspected wrongdoing which a worker reasonably believes is in the public interest and which falls within one or more categories recognised by whistleblowing legislation.

Examples include information tending to show that:

- a criminal offence has been, is being or is likely to be committed;

- a person has failed, is failing or is likely to fail to comply with a legal obligation;
- a miscarriage of justice has occurred, is occurring or is likely to occur;
- the health or safety of any individual has been, is being or is likely to be endangered;
- the environment has been, is being or is likely to be damaged; or
- information about any of the above matters has been, is being or is likely to be deliberately concealed.

In a school context, a whistleblowing concern might include, for example, serious safeguarding failures, unsafe practices, financial malpractice, fraud, corruption, serious breaches of legal or regulatory duties, or a deliberate failure to address serious wrongdoing.

4. Whistleblowing and Personal Grievances

Whistleblowing is not normally the appropriate procedure for a concern which relates only to an individual's personal employment position, such as a disagreement about pay, appraisal, working hours or management treatment. These matters should normally be raised under the School's grievance or other relevant procedure.

A concern may, however, fall within whistleblowing law if it raises a wider issue which the individual reasonably believes is in the public interest. If you are unsure which procedure applies, you may seek advice from the Head, Bursar, Chair of Governors or an independent advice service.

A concern will not be rejected simply because the person raising it has a personal interest in the matter. The School will consider the substance of the information disclosed and the appropriate route for dealing with it.

5. Safeguarding Concerns

Safeguarding concerns must be acted upon without delay. Concerns about a child or about safeguarding practice should normally be reported immediately in accordance with the School's Safeguarding and Child Protection Policy to the Designated Safeguarding Lead ("DSL") or a deputy.

Where a concern relates to the conduct of the Head, the DSL, a member of senior leadership, or where an individual reasonably believes that a safeguarding concern cannot safely or appropriately be raised through the usual internal arrangements, the individual may use the alternative reporting routes in this policy or contact an appropriate external body.

Nothing in this policy should delay immediate action where a child or another person is at risk of serious harm or where emergency services or another statutory authority need to be contacted.

6. Protection from Detriment, Retaliation or Victimisation

The School will not tolerate retaliation against a person because they have raised, or are believed to have raised, a genuine whistleblowing concern.

No worker should be dismissed, disadvantaged, threatened, bullied or subjected to other detrimental treatment because they have made a protected disclosure or raised a genuine concern under this policy.

Any allegation of retaliation will be taken seriously and may result in disciplinary action where appropriate.

The School recognises that a concern may ultimately prove to be mistaken. A person will not be treated adversely merely because their concern was not substantiated, provided they did not knowingly make a false allegation or otherwise act in bad faith.

7. Confidentiality and Anonymous Disclosures

The School hopes that individuals will feel able to raise concerns openly. If a person wishes to raise a concern confidentially, the School will take reasonable steps to protect their identity. Absolute confidentiality cannot always be guaranteed, for example where disclosure is necessary to investigate the concern fairly, comply with a legal obligation or protect the safety of others. Where practicable, this will be discussed with the individual before their identity is disclosed.

Anonymous disclosures will be considered, but may be more difficult to investigate or verify. The School will assess anonymous information according to its seriousness, credibility and the availability of evidence.

Information will be handled sensitively and shared only with those who need to know in order to investigate, manage risk or comply with legal or regulatory obligations.

8. How to Raise a Concern

A concern may be raised verbally or in writing. A written disclosure is helpful where practicable and should include as much relevant information as possible, including:

- what has happened, is happening or is likely to happen;
- when and where relevant events occurred;
- who is involved;
- why the individual believes the matter is a concern;
- any supporting information or evidence available; and
- whether the individual wishes their identity to be kept confidential.

A concern should normally be raised with one of the following, depending on the circumstances:

- the Head;
- the Bursar; or
- another appropriate senior member of staff where the concern relates to, or it would not be appropriate to approach, the Head or Bursar.

If the concern involves the Head or Bursar, or if the individual reasonably believes that the concern cannot be dealt with independently through the normal management structure, it may be raised directly with the Chair of Governors. If the concern involves the Chair, it may be raised with another appropriate governor or member of the proprietorial body.

The School will ensure that staff are given current contact details for the appropriate internal reporting routes through induction or other staff information. Where appropriate, concerns may also be raised through the School's confidential reporting arrangements if these are in place.

9. Initial Response

The person receiving the concern will acknowledge it, normally within a reasonable period, and will make an initial assessment of how it should be handled.

Depending on the nature of the concern, the School may:

- investigate the matter internally;
- refer it to the DSL or safeguarding process;
- seek advice from external professional advisers;
- refer the matter to the police, local authority, regulator or another relevant body;
- appoint an independent investigator; or
- take other proportionate action.

Not every concern will require a full formal investigation. The response will be proportionate to the seriousness and nature of the information provided.

The person raising the concern will normally be told that it has been received and, so far as appropriate, how it will be handled. They may be asked to provide further information.

10. Investigation and Outcome

Investigations will be conducted as promptly, fairly and independently as the circumstances allow. The person appointed to investigate should not have a conflict of interest or other involvement that could reasonably undermine confidence in the process.

The scope and method of the investigation will depend on the nature of the concern. The School may obtain relevant records, speak to individuals, seek specialist advice or involve an external investigator or authority where appropriate.

The individual who raised the concern will normally be given appropriate feedback on progress and, where possible, the outcome. However, the School may be unable to provide detailed information about confidential personnel matters, safeguarding matters, third-party information, disciplinary action or other matters which it is not appropriate or lawful to disclose.

Where a concern is substantiated, the School will take appropriate corrective action. This may include changes to practice, additional controls or training, disciplinary action, referral to an external authority or other remedial measures.

11. Raising a Concern Further Within the School

If an individual reasonably believes that their concern has not been dealt with appropriately, or if new information becomes available, they may raise the matter with the Chair of Governors or another appropriate member of the Governing Body or proprietorial body, depending on the circumstances and any conflict of interest.

The School will ensure that the governance route is used appropriately and that those considering the concern have sufficient independence from the matters raised.

12. External Disclosures

The School encourages concerns to be raised internally first where it is safe and appropriate to do so, as this usually gives the School the best opportunity to investigate and address the matter promptly. However, an individual may in some circumstances make a protected disclosure externally.

External disclosures may be made to an appropriate prescribed person or body, a legal adviser in the course of obtaining legal advice, or in other circumstances permitted by whistleblowing legislation. The statutory rules governing external disclosures can be more complex than those applying to internal reporting.

The current list of prescribed persons and bodies is published and updated by the Government. Individuals should ensure that any external disclosure is made to a body whose remit covers the subject matter of the concern.

In a safeguarding context, individuals who feel unable to raise concerns internally may seek advice through the NSPCC Whistleblowing Advice Line or contact the relevant statutory authority, regulator or emergency service as appropriate.

Disclosure to the media or through social media will rarely be appropriate and may not attract statutory protection. Individuals are strongly encouraged to seek independent advice before making any public disclosure.

13. Support and Accompaniment

A person raising a concern may, where appropriate, be accompanied at a meeting by a work colleague or trade union representative. The companion must respect the confidentiality of the process.

The School will consider what practical support may be appropriate for a person who raises a serious concern, particularly where they have concerns about confidentiality, working relationships or possible retaliation.

14. False or Malicious Allegations

A concern that is made honestly and reasonably, but which is not substantiated, will not of itself lead to disciplinary action.

However, knowingly making a false allegation, deliberately providing misleading information, or acting maliciously may be treated as a disciplinary matter.

15. Records and Data Protection

The School will keep an appropriate record of whistleblowing concerns, investigations, decisions and actions. Access will be restricted to those with a legitimate need to know.

Personal data will be processed in accordance with the School's data protection obligations. Records will be retained only for as long as necessary and in accordance with the School's retention arrangements, legal obligations and the need to maintain an appropriate audit trail.

16. Training, Awareness and Monitoring

The School will ensure that staff are made aware of this policy and know how to raise concerns. Whistleblowing arrangements form part of the School's wider culture of safeguarding, integrity, accountability and professional conduct.

The Head and Bursar will keep the operation of this policy under review. Significant themes or systemic concerns will be escalated to the Governing Body or proprietorial body as appropriate, while maintaining necessary confidentiality.

The School will review whether any lessons can be learned from concerns raised, including whether changes to policy, training, supervision, controls or culture are required.

17. Policy Review

This policy will be reviewed annually and sooner where required by changes in legislation, statutory guidance, regulatory requirements or School practice.

Appendix 1: Quick Guide for Staff

If you become aware of serious wrongdoing or malpractice:

- Do not ignore it.
- Act immediately if there is a safeguarding concern or immediate risk of harm.
- Use the normal safeguarding procedure for child protection concerns.
- Otherwise, raise the concern with the Head, Bursar or another appropriate senior person.
- If the concern involves those individuals, use the governance route set out in this policy.
- Provide facts and information rather than speculation wherever possible.
- Keep the matter confidential and do not investigate it yourself unless authorised to do so.
- If you do not feel able to raise the matter internally, seek independent advice or consider an appropriate external prescribed person or body.
- Keep a record of what you raised and when.

Appendix 2: Key External Sources of Advice

The School does not require individuals to use these services before raising a concern. They are provided as sources of independent information and advice.

- Acas – guidance on whistleblowing and employment rights.
- Protect – independent advice on whistleblowing and protected disclosures.
- The NSPCC Whistleblowing Advice Line – advice on raising concerns about child safeguarding practice.
- GOV.UK – the current list of prescribed persons and bodies for whistleblowing disclosures.