



POLICY DOCUMENT

Whistleblowing Policy

Princess May Primary School's approach to whistleblowing — 2026–2027

Governing Body Representative (GBR)	Kristofer McGhee (Chair of Governors)
Signed by (GBR)	
Date approved	4 September 2026
Next review due by	September 2027
Related policies	Low-Level Concerns Policy; Safeguarding and Child Protection Policy; Staff Code of Conduct; Guidance for Schools on Dealing with Allegations of Abuse Against Staff and Volunteers; staff disciplinary and grievance procedures
Aligned to	The Public Interest Disclosure Act 1998; the Employment Rights Act 1996, as amended, including by the Employment Rights Act 2025, which added sexual harassment as a category of protected disclosure from 6 April 2026; Keeping Children Safe in Education 2026 (in force from 1 September 2026); and the Crime and Policing Act 2026, including its new mandatory duty to report known or suspected child sexual abuse

1. Aims

Princess May Primary School is committed to the highest standards of openness, honesty and accountability. This policy aims to:

- encourage staff, volunteers and governors who have a genuine concern about wrongdoing at school to come forward and raise that concern, rather than overlooking it;
- provide ways for staff to raise a concern, and receive feedback on any action taken;
- reassure staff that they will be protected from reprisals or victimisation for whistleblowing in good faith, in line with the law; and
- make clear that this policy is separate from our Low-Level Concerns Policy and our Safeguarding and Child Protection Policy, and is intended for concerns that a member of staff feels unable to raise through normal channels, or that have not been satisfactorily addressed.

2. What is whistleblowing?

Whistleblowing is the term used when a worker raises a concern about wrongdoing that they have witnessed at work, in the public interest. Such a concern is called a 'protected disclosure' and may, for example, relate to:

- a criminal offence, such as fraud;
- a person's health and safety being in danger;
- damage to the environment;
- a miscarriage of justice;
- the school breaking the law, or failing to comply with a legal obligation;
- sexual harassment, which became a specific category of protected disclosure under the Employment Rights Act 2025 from 6 April 2026; or
- someone covering up wrongdoing.

A concern does not need to be about a colleague; it may equally relate to the actions of the school itself, a contractor, or another organisation the school works with. Whistleblowing is different from a grievance, which is a complaint about how you have personally been treated, and different from a low-level concern or an allegation about a child's safety, both of which are dealt with under our Low-Level Concerns Policy and Safeguarding and Child Protection Policy respectively; where a concern touches on more than one of these, we will use whichever procedure best fits the substance of the concern, and staff should not worry about choosing the 'wrong' route — raising it is what matters.

3. Legislation and guidance

This policy is based on the Public Interest Disclosure Act 1998 and the Employment Rights Act 1996, as amended. The Employment Rights Act 2025 strengthened these protections further, adding sexual harassment as a category of wrongdoing that can form a protected disclosure, with effect from 6 April 2026, and, from October 2026, requiring employers to take all reasonable steps to prevent the harassment of their staff, including harassment by a third party such as a parent, visitor or contractor.

This policy also reflects Keeping Children Safe in Education 2026, and the Crime and Policing Act 2026, which introduced a new mandatory duty for education staff to report known or suspected child sexual abuse to the police and children's social care; a disclosure of this kind is made to the DSL, in line with our Safeguarding and Child Protection Policy, rather than under this policy.

The school will never ask a member of staff to sign an agreement, including a settlement or reference agreement, that would prevent them from making a protected disclosure in the public interest; any clause that purported to do so would not be enforceable.

4. Roles and responsibilities

All staff, volunteers and governors are encouraged to use this policy to raise a genuine concern, and are expected to co-operate with any investigation carried out under it. The Headteacher has overall responsibility for the maintenance and operation of this policy, and maintains a record of concerns raised and their outcome, in a form that does not compromise confidentiality.

Where a concern is about the Headteacher, this should be raised with the Chair of Governors instead; contact details are available from the school office, or from the Clerk to the Governing Body.

5. Confidentiality

We hope staff will feel able to raise a concern openly under this policy. If this is difficult, staff can raise it in confidence, and we will make every effort to keep a whistleblower's identity confidential if requested, unless disclosure is required by law, or is necessary to allow a fair investigation to take place. Staff who are concerned about the confidentiality of a disclosure should discuss this with the person they are raising it with at the outset.

6. Anonymous allegations

This policy encourages staff to put their name to a concern wherever possible, as concerns expressed anonymously are much less powerful and harder to investigate. Anonymous concerns will, however, still be considered at the discretion of the Headteacher or Chair of Governors, taking into account the seriousness of the issue raised, the credibility of the concern, and the likelihood of confirming the allegation from attributable sources.

7. Untrue allegations

A member of staff who makes an allegation in good faith, reasonably believing it to be substantially true, and does not act maliciously or for personal gain, will not be at risk of losing their job or suffering any form of retribution as a result, even if the concern is not subsequently confirmed by an investigation. Making a deliberately false allegation, however, knowing it to be untrue, may be treated as a disciplinary matter.

8. How to raise a concern

A concern should usually be raised with the Headteacher in the first instance, either verbally or in writing; where the concern is about the Headteacher, it should instead be raised with the Chair of Governors. Staff should provide as much information as possible, including any background and history to the concern, giving names, dates and places where they can, and the reason why they are particularly concerned about the situation.

Although staff are not expected to prove the truth of an allegation, they will need to demonstrate to the person they report it to that there are sufficient grounds for their concern.

9. How the school will respond

The action the school takes in response to a concern raised under this policy will depend on the nature of the concern. This may include an internal investigation, referral to the police, referral to an external auditor or inspector, such as Ofsted or the Local Authority, or independent investigation.

Within 10 school days of a concern being raised, the Headteacher or Chair of Governors will write to the member of staff to:

- acknowledge that the concern has been received;
- indicate how the school proposes to deal with the matter;
- give an estimate of how long it will take to provide a final response;

- advise whether any initial enquiries have been made; and
- tell the member of staff whether further investigation will take place, and if not, why not.

The amount of contact between the person considering the issues raised and the member of staff will depend on the nature of the matter, the potential difficulties involved, and the clarity of the information provided. Where necessary, we will seek further information from the member of staff who raised the concern. Once the school's investigation is complete, the outcome will be reported back to the member of staff, so far as it is possible to do so without compromising a duty of confidentiality owed to another person.

10. Taking a concern further

This policy is intended to provide staff with an avenue to raise concerns within the school; in most cases, staff should not find it necessary to alert anyone externally. Where a member of staff feels their concern has not been properly addressed by the school, or feels unable to raise it internally, they may take the matter further to Hackney Education, the Local Authority Designated Officer (LADO), or Ofsted. The NSPCC's Whistleblowing Advice Line, on 0800 028 0285, provides free, independent advice to anyone who has concerns about how a child protection issue is being handled in a school or education setting.

The Public Interest Disclosure Act 1998 also allows a disclosure to be made to a wider range of people or bodies, depending on the circumstances, including a relevant regulator, a legal adviser, or, in certain circumstances, more widely; a disclosure of this kind will only be protected by law where it meets specific conditions, and staff are encouraged to seek independent advice, for example from their trade union or the NSPCC's Whistleblowing Advice Line, before doing so.

11. Protection and support for the whistleblower

The school will not tolerate harassment or victimisation of anyone who raises a genuine concern under this policy, and will take action to protect staff when they raise a concern in good faith. Any staff member who believes they have suffered any such treatment should inform the Headteacher immediately; if the matter is not remedied, and the staff member believes they have suffered detriment as a result of whistleblowing, they may raise this as a formal grievance.

12. Monitoring

The Headteacher keeps a confidential record of concerns raised under this policy and their outcome, and reports to the governing board annually on the number and nature of concerns raised, without compromising confidentiality. This policy is reviewed annually by the Headteacher, and approved by the governing board.

13. Links to other policies

- Low-Level Concerns Policy;
- Safeguarding and Child Protection Policy;
- Staff Code of Conduct;
- Guidance for Schools on Dealing with Allegations of Abuse Against Staff and Volunteers; and
- staff disciplinary and grievance procedures.