Olveston CEVC Primary School

Whistleblowing Policy

Signed (Chair):	Name Helen Webb	Date: November 2025
Signed (Headteacher):	Name: Lee Dunn	Date: November 2025
Ratified: by Personel	Next Review: November 2026	

Changes in policy
Completely New Policy since January 2022 version Nov 24 – No changes

Ephesians 3:17-19 *That Christ may dwell in your hearts through faith, as you are being rooted and grounded in love. I pray that you may have the power to comprehend, with all the saints, what is the breadth and length and height and depth, and to know the love of Christ that surpasses knowledge, so that you may be filled with all the fullness of God.*

The vision of the school, along with the values and attributes we seek to instil, form the foundation and the rationale behind our decisions, policies, and procedures as we strive to inspire the hearts and minds of all who work and learn in our school community in order for each individual to thrive and flourish. This policy has been developed to support our vision that all that we do is 'Rooted in Love'

Equality Impact Assessment (EqIA)

This policy has been assessed with regard to its impact on equalities issues. The equality impact assessment has been conducted by the Head teacher and focused on race, gender, disability, age, sexual orientation, gender identity and religion/belief. Community Cohesion has also formed part of the impact assessment work in order to ensure respect for diversity, alongside a commitment to common and shared bonds.

EqIA outcomes

- *The assessment found no areas of potential negative impact and actions resulting in positive impact are in place.*

Whistleblowing

This policy sets out the process for protected disclosures of information where employees and other workers, suppliers or volunteers have reasonable belief that there is serious malpractice.
This applies to all council employees and other workers, including temporary and agency staff, trainers, volunteers, consultants, contractors and councillors.
Also to all volunteers and employees of organisations who work in partnership with the council.
Suppliers should raise any issues with the Client Officer, or if not appropriate, the council's HR Service Director.
This policy will be made available to all of the above.
Members of the public should pursue complaints about services through the council's complaints procedure.
The policy will be subject to a formal review on a two-yearly basis by the
HR Service Director (Local Authority) and annually by local governance.

This guide is about:

- ❖ What is 'whistleblowing'?
- ❖ What can be raised
- ❖ How to raise it
- ❖ What will happen next
- ❖ How you will be supported

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Whistleblowing Policy

The council's 'Code of Conduct' makes it clear employees are expected to raise any serious concerns they have regarding aspects of work, practices which affect the integrity of the council, the safety of its employees or the general public. The council equally encourages those working with us who may not be employees, to come forward and raise concerns of this nature.

Allegations should only be raised under this policy if there is reasonable belief the disclosure is in the public interest. 'Public interest' means anything affecting the rights, health, or finances of the public at large.

The council promotes a culture of openness but recognises that 'blowing the whistle' can be difficult, particularly concerns about the possibility of victimisation. Such fears are understandable; this policy provides advice about the protections offered by the Public Interest Disclosure Act (PIDA). The Act protects workers from detrimental treatment or victimisation if, in the public interest, they blow the whistle.

As stated in paragraph 1 above individuals who are working with the Council, but who are not employed by the Council are encouraged to raise concerns.

These individuals do not benefit from the protections contained in the PIDA that are afforded to workers. In these circumstances the Council will consider what reasonable measures it can take to ensure a person making a disclosure is treated fairly and is not disadvantaged as a result of a disclosure. Whistleblowers are encouraged to include their name when making an allegation. Anonymous allegations will be investigated but are less powerful and more difficult to act on.

This policy is not a substitute for other council policies regarding matters such as personal grievances, bullying and harassment, health and safety, safeguarding issues (children and/or adults) or complaints. It should not be used to raise issues relating to employee's terms and conditions of service.

Scope

This policy applies to:

- all council employees and
- other workers, including freelance staff, temporary and agency staff, trainers, volunteers, consultants, contractors
- Councillors
- Teachers and employees in schools

The council recognises in the case of school-based employees many decisions-making responsibilities lie with the governing body, and in Voluntary Aided schools the governing body not the council is the employer. It is expected that the governing body will be committed to support the council's approach to cases of whistleblowing set out in this policy.

Voluntary Aided schools may have their own whistleblowing policy.

What can be raised as Whistleblowing?

The law protects individuals who make disclosures known as 'protected disclosures' against dismissal or any detriment.

You are protected by law if you blow the whistle regarding any of the following:

- A criminal offence, e.g. fraud
- Health and safety risks where someone could be in danger
- Risk or harm to the environment

- Miscarriages of justice
- The organisation is breaking the law
- You believe serious wrongdoing is being covered up

Some examples of the above are:

- Use of unsafe equipment or unsafe working methods
- Employment of illegal immigrants
- Concealing a chemical spillage
- Financial irregularities including fraud, corruption or unauthorised use of public funds, False returns to HMRC
- Bribery
- Sexual, racial, physical or other abuse of service users
- Other causes of malpractice, negligent, unprofessional or unethical
- behaviour
- The conduct of contractors and/or suppliers to the council
- Concealment of any of the above.

The following are not considered to be whistleblowing – so the protection and this policy do not apply:

- Personal grievances (e.g. bullying and harassment, discrimination) – these are not covered by the whistleblowing legislation unless there is an impact on the public interest. If it's unclear which policy to raise an issue under please contact HR Casework & Change for advice
- Conduct issues (e.g. a colleague is abusing the flexi time system)
- Complaint for example poor service
- Misappropriation e.g. poor financial practice that is unlikely to affect the public interest. Refer to auditfraud@southglos.gov.uk.

Procedure

How to 'blow the whistle'

Initially raise the concerns with your line manager or Head Teacher.
Alternatively:

- the Chair of the Governing Body or South Gloucestershire Councils HR Service Director
- Departmental Director
- Head of Legal Service – Monitoring Officer

It should be clear that the concern/allegation is being raised under the Whistleblowing policy. Complaints, grievances or safeguarding concerns about adults or children issues should be raised under those specific procedures and by contacting the council's Local Authority Designated Manager (LADO) for children's or the adult safeguarding team.
All whistleblowing cases must be registered immediately by the manager/Head Teacher with the HR Service Director. In cases of financial irregularity e.g. fraud, corruption or unauthorised use of public funds, the HR Service Director will contact the councils Audit Manager.

The HR Service Director will contact the following as appropriate (if they are not already aware) to inform them of the allegation:

- Departmental Director;
- Governing Body;
- Monitoring Officer and Head of Legal & Democratic Services;
- Chief Executive.

In some situations, the whistleblower may want advice from and/or involve a colleague or trade union representative. They may also be present during any subsequent interview or meeting.

The council will take the following into account when considering anonymous allegations:

- The seriousness of the matter raised.
- The credibility of the allegation.
- The likelihood of obtaining information which could confirm the allegation.

Schools

Schools must notify South Gloucestershire Council's HR Service Director of any whistleblowing.
The HR Service Director will inform the school if the case should be considered by for example the Director of Children's Adults and Health (CAH) or the Chief
Executive, rather than the Governing body.

Response

The HR Service Director or governing body will write to the complainant within
10 working days of the concern being raised to acknowledge receipt and explain what will happen next.

Depending on the nature of the allegation, arrangements will be made for the matter to be:

- Investigated internally by departmental management, Internal Audit or a senior manager from another department, and/or
- Investigated by an external investigator with or without an internal investigator
- The Director or the governing body may, with agreement by the HR Service Director, commission the investigation to be undertaken by an appropriate and suitably qualified independent consultant
- Referred to the External Auditor to be investigated; and/or
- Referred to the appropriate external enforcement agency e.g. Health and Safety Executive, Environmental Agency, Police or the appropriate Government Department.

In some cases, the problem may be resolved without the need for an investigation for example if urgent action is needed to secure relevant information or to protect the safety of individuals, action will be taken immediately.

Investigation

If necessary, an investigation will be carried out to discover the facts/any evidence to support the allegation or otherwise.

Within 20 working days of the allegation being made the investigating officer will inform the person raising the concern what action is being taken and likely timescales. Feedback will be provided on an agreed and regular basis.

Support

An individual will be identified to provide support and information to the whistleblower throughout the investigation and any subsequent developments.

If appropriate employees being investigated will be provided with support from a contact/liaison officer.

If the whistleblower feels victimised or harassed as a result of raising a concern,they should advise the person identified in 'Support' section above and/HR Policy and Operations at hrpolicyandoperations@southglos.gov.uk

Concerns arising as a result of 'blowing the whistle' can be raised with the charity Protect (previously Public Concern at Work) on 020 3117 2520 or email: whistle@protect-advice.org.uk

The outcome

Following the investigation, the Director/governing body will:

- Determine as soon as possible whether any temporary arrangements made to support the investigation e.g. suspension, can be ceased
- Determine whether or not there is a case to answer based on the facts provided within the investigation report
- If applicable, arrange a formal hearing to which the employee will be invited.

Subject to any legal constraints, the council will inform the whistleblower of the outcome of the investigation e.g. evidence was found to support the allegation/or not.

If the whistleblower, is dissatisfied with the outcome, they should write to the council's Chief Executive outlining their concerns.

External disclosures

Normally before making an external disclosure the internal whistleblowing procedure will have been followed.

If the whistleblower is dissatisfied with the council's response through its internal procedures, the following external organisations can be contacted as appropriate:

- Environment Agency
- External Auditor
- Health & Safety Executive
- Care Quality Commission (CQC)
- Ofsted.

Other workers & suppliers

When other workers or suppliers blow the whistle the same procedure should be followed as covered in this document.

If you are unsure who to raise your concern with please contact HR Policy and Operations at hrpolicyandoperations@southglos.gov.uk

Malicious Whistleblowing

If allegations are found to be malicious/not in good faith disciplinary action may be taken which could result in dismissal/ending of working relationship.

Please note if you have raised a concern in good faith you will not be subject to any detrimental action even if your allegations are unproven.

Responsibilities

Managers:

- Ensure their staff (including agency staff, contractors, volunteers, consultants, etc.) are aware of and follow council financial, health and safety and other procedures
- Register whistleblowing cases brought to their attention immediately with the HR Service Director, and as appropriate Safeguarding, Internal Audit.
- Provide support to any employee making a whistleblowing complaint.

HR Service Director

- The HR Service Director has overall responsibility for overseeing the whistleblowing procedure and agreeing actions
- Respond to the whistleblower within 10 working days of the concern being raised
- Inform the relevant Departmental Director/Governing Body with details
- Advise and guide Director/Governing Body
- Inform others i.e. Head of Legal/Monitoring Officer as appropriate
- Work jointly with Director/Governing Body to appoint investigators and agree terms of reference if required.

Directors/Governing Body:

- Notify the HR Service Director of cases of whistleblowing
- Respond to whistleblowing submissions positively within the timescales set out within this policy
- Decide if an investigation is required
- Identify investigators
- Commission report and determine the terms of reference
- Assess content of investigation report
- Agree outcomes/action(s).

Employees:

- Raise serious concerns about aspects or work or practices which affect the integrity of the council or the safety of employees or the public.

Human Resources

- HR Policy and Operations to record and assist with whistleblowing procedural issues as appropriate.
- HR Casework & Change may provide support with investigations as appropriate and work with the trade unions as appropriate.