Whistleblowing Policy

Ethos Statement

TAO Independent School is committed to educating with honesty and integrity and expects all staff to maintain high standards in accordance with their contractual obligations and the School's policies and procedures..

However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring or to address them when they do occur.

Purpose

- This procedure is not a substitute for normal line management processes but an addition to them. Staff should always first consider using normal line management for raising concerns.

- This procedure is only for the purpose of raising concerns about wrongdoing and is not a substitute or alternative for existing procedures such as the grievance, disciplinary procedures for staff or the complaints procedure.

- his procedure may be used where a member of staff has a concern about wrongdoing or risk in the public interest, including where they do not feel able to raise the matter through normal line-management arrangements.

As an example, if a member of staff has a personal grievance, then it must be raised through the grievance procedure; it would not be appropriate for it to be raised through this procedure.

The existence of this procedure does not prevent staff from raising concerns through their trade union if they so wish. This procedure is intended for concerns about wrongdoing or risk in the public interest. Routine disagreements about management decisions should normally be addressed through management, grievance or other appropriate procedures unless the concern involves suspected wrongdoing falling within this policy. which may arise from weak management rather than malpractice.

This policy takes account of the This policy takes account of current whistleblowing law, relevant government guidance and recognised good practice, including guidance from Protect, the UK whistleblowing charity..

This policy reflects TAO Independent School's current arrangements and applies to all individuals working at or on behalf of the School, including the Proprietor, Headteacher, employees, consultants, contractors, trainees, part-time and fixed-term workers, casual and agency staff.

Principles

- To encourage staff 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.
- To provide staff with guidance as to how to raise those concerns.
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they ultimately prove to be mistaken without fear of reprisals, even if they turn out to be mistaken.

What is 'Whistleblowing'?

'Whistleblowing usually involves a worker disclosing information which they reasonably believe tends to show wrongdoing and is made in the public interest. Where the legal requirements are met, this may amount to a protected disclosure under the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998. This may include:

- Criminal activity.
- Child protection and/or safeguarding concerns, (see note at the end of this policy).
- Miscarriages of justice.
- Danger to health and safety.
- Damage to the environment.
- Failure to comply with any legal or professional obligation or regulatory requirements.
- Financial fraud or mismanagement.

- Negligence.
- Breach of the company's internal policies and procedures including its Code of Conduct.
- Conduct likely to damage the company's reputation.
- Unauthorised disclosure of confidential information.
- The deliberate concealment of any of the above matters.

A whistleblower is a worker who raises a concern about suspected wrongdoing or danger in the public interest. A concern does not need to prove wrongdoing, but should be based on information the worker reasonably believes indicates a relevant concern. relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the company's activities (a whistleblowing concern) you should report it under this policy.

If staff are uncertain whether a matter falls within this policy, they may seek advice from the Headteacher. Where the concern relates to the Headteacher, staff should raise it with the Proprietor. Where the concern relates to the Proprietor, or the worker reasonably believes internal reporting is inappropriate, an appropriate external route may be used.

Raising a 'Whistleblowing' Concern

TAO hopes that in many cases staff will be able to raise any concerns with their Headteacher, speaking to them in person or putting the matter in writing if they prefer. They may be able to agree a way of resolving a concern quickly and effectively.

However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

The Headteacher should normally receive whistleblowing concerns. Where the concern relates to the Headteacher, or the member of staff does not feel able to raise it with the Headteacher, the concern should be raised with the Proprietor. Where the concern relates to safeguarding practice, staff must also follow the Safeguarding & Child Protection Policy. Where information indicates that the harm threshold may be met in relation to an adult working with children, the appropriate allegations/LADO procedure must be followed without delay.

The person receiving the concern will arrange to speak with the whistleblower as soon as practicable and will make an appropriate written record of the concern, including the issues raised, relevant evidence, requested confidentiality and any immediate safeguarding or safety action required Where the whistleblower provides their identity, this will be recorded appropriately. Anonymous concerns may also be considered where sufficient information is available to assess the seriousness and credibility of the concern..

Staff may bring a colleague or trade union representative to any meetings under this policy who must respect the confidentiality of the disclosure and any subsequent investigation. TAO will take notes and produce a written summary of the concern raised and provide the 'whistleblower' with a copy as soon as practicable after the meeting. The company will also aim to give the ''whistleblower'' an indication of how it proposes to deal with the matter

Confidentiality

The company hopes that staff will feel able to voice whistleblowing concerns openly under this policy. However, if a member of staff wants to raise his or her concern confidentially, TAO will endeavour to keep his or her identity secret in so far as it is possible to do so when following this policy and procedure. If it is necessary for anyone investigating that member of staff's concern to know the 'whistleblower's identity, the School will seek to protect the whistleblower's identity so far as reasonably possible. Where disclosure of identity may be necessary for a fair investigation, safeguarding action or legal requirement, this will be discussed with the individual where practicable..

Staff are encouraged to raise concerns openly where they feel able to do so, because this can assist effective investigation. However, anonymous concerns will not be disregarded solely because the identity of the person raising them is unknown and will be considered according to the seriousness, credibility and information available.

'Whistleblowers' who are concerned about possible reprisals if their identity is revealed should come forward to one of the contacts listed above and appropriate measures can then be taken to preserve confidentiality.

If you are in any doubt, you can seek advice.

Their contact details are:

Protect – independent whistleblowing advice: 020 3117 2520. Free and confidential advice is available through Protect's Advice Line.

NSPCC Whistleblowing Advice Line: 0800 028 0285 – for staff who do not feel able to raise concerns about child protection failures internally, or who are concerned about how a safeguarding concern is being handled. KCSIE 2026 expressly identifies this route. (GOV.UK)

External Disclosures

The School encourages concerns to be raised internally where appropriate, but recognises that workers may make disclosures externally where permitted by law. Depending on the subject matter, this may include a prescribed person or regulator, the Local Authority, Police, Children's Social Care, LADO, Ofsted, the Department for Education, Health and Safety Executive, Information Commissioner's Office or another appropriate statutory body. Staff may seek independent advice from Protect before making an external disclosure. Disclosure to the media is subject to a significantly higher legal threshold and staff are strongly advised to obtain independent legal or whistleblowing advice before considering such action. A worker may also raise a concern with an appropriate external body where the subject matter falls within that body's statutory remit and the legal requirements for a protected disclosure are met.

Investigation & Outcome

The Headteacher or Proprietor, as appropriate, will carry out an initial assessment to determine the nature of the concern, any immediate safeguarding or safety action required and the appropriate route for investigation.The member of staff raising the concern may be required to attend additional meetings in order to provide further information.

The School will appoint an appropriate person or persons to investigate according to the nature, seriousness and complexity of the concern. External or specialist support may be used where necessary to secure independence or appropriate expertise, including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable the company to minimise the risk of future wrongdoing.

TAO will aim to keep the member of staff informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the company from giving specific details of the investigation or any disciplinary action taken as a result. The member of staff is required to treat any information about the investigation as strictly confidential.

Whilst the company cannot always guarantee the outcome a member of staff is seeking, the company will try to deal with the concern fairly and in an appropriate way. If a member of staff is not happy with the way in which his or her concern has

been handled, he or she can raise it with one of the other key contacts outlined above.

There is no formal appeal stage under this procedure. However, where a whistleblower reasonably believes their concern has not been addressed appropriately, they may raise the matter with the Proprietor, another appropriate internal recipient or an external body as permitted by law.

Any member of staff raising a concern under the procedure will be The whistleblower will be kept appropriately informed by the person managing the concern, subject to confidentiality, safeguarding, data protection and employment-law considerations., including, where appropriate, the outcome. However, in certain circumstances, e.g. where disciplinary action under the company's Disciplinary Procedure has resulted from the concern, it may not be appropriate to provide specific details due to the confidentiality and sensitivity of such matters.

Protection & Support for Whistleblowers

It is understandable that 'whistleblowers' are sometimes worried about possible repercussions. The company aims to encourage openness and will support staff who raise genuine concerns or make protected disclosures, even where the concern is ultimately not substantiated.

Staff must not suffer detriment because they have made a protected disclosure or raised a genuine whistleblowing concern. Retaliation, victimisation or attempts to silence a whistleblower will not be tolerated.. If a member of staff believes that he or she has suffered any such treatment, he or she should inform report the matter to the Headteacher or Proprietor, as appropriate.. If the matter is not remedied the member of staff should raise it formally using the company's Grievance Policy and Procedure.

Staff must not threaten or retaliate against 'whistleblowers' in any way. Anyone involved in such conduct will 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 or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries about this policy should be addressed to the Headteacher or Proprietor. in the first instance.

Appendix 1

Don't think *'what if I'm wrong'?*.....think, *'what if I'm right?'.*

Reasons for whistleblowing:

- Everyone has a responsibility for raising concerns about unacceptable practice or behaviour.
- To prevent the problem worsening or widening.
- Safeguarding concerns.
- To protect or reduce risks to others.
- To prevent becoming implicated yourself.

What stops people from whistle blowing:

- Starting a chain of events which spirals.
- Disrupting the work or project.
- Fear of getting it wrong.
- Fear of repercussions or damaging careers.
- Fear of not being believed.

How to raise a concern:

- You should voice your concerns, suspicions or uneasiness as soon as you feel you can.
- The earlier a concern is expressed the easier and sooner action can be taken.
- Try to pinpoint exactly what practice is concerning you and why.
- Approach the Headteacher or Proprietor, using the reporting route appropriate to the concern.
- If your concern is about the Headteacher, raise it with the Proprietor. If your concern is about the Proprietor, or you reasonably believe internal reporting is inappropriate, you may contact an appropriate external body such as the LADO, Local Authority, Police, NSPCC Whistleblowing Advice Line, Ofsted or another prescribed person/regulator, depending on the nature of the concern.
- If you reasonably believe the concern has not been addressed appropriately, consider escalating it through the routes set out in this policy.

- You should then put your concerns in writing, outlining the background and history, giving names, dates and places where you can.

- A member of staff is not expected to prove the truth of an allegation but will need to demonstrate sufficient grounds for the concern.

What happens next?

- You should be given information on the nature and progress of any enquiries. Your employer has a responsibility to protect you from harassment or victimisation.

- No disciplinary action will be taken merely because a genuine concern is not substantiated. Knowingly false or malicious allegations may, however, be dealt with under the School's disciplinary procedures.

- Allegations made frivolously, maliciously or for personal gain will be seen in a different light and disciplinary action may be taken.

Self-Reporting

Staff must inform the Headteacher/DSL where any personal circumstance, conduct issue, health matter or other factor may affect their suitability to work safely with pupils. Support will be considered where appropriate, but safeguarding duties take precedence where pupil welfare may be affected.

Further Advice and Support

Advice and support may be sought from the Headteacher, Proprietor, HR adviser, trade union, Protect or another appropriate professional or statutory body.

Legal Framework & Review

This policy has been developed with reference to the following legislation and guidance:

- Education (Independent School Standards) Regulations 2014 (as amended), including Part 3
- Equality Act 2010
- Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998
- Keeping Children Safe in Education (KCSIE) 2026

- **Working Together to Safeguard Children 2026**
- Public Interest Disclosure (Prescribed Persons) Order 2014, as amended

Linked Policies & Documents

• Safeguarding & Child Protection Policy

• Staff Code of Conduct & Wellbeing Framework

• Complaints Policy

• Grievance Procedure

• Disciplinary Procedure

• Safer Recruitment Policy

Version Updates

Version	Date	Author	Review / Changes	Approved By
2.0	09/09/26	Daniel Giblin	09/09/27	Headteacher / Proprietor