Confidential Reporting Policy

Also known as 'Whistleblowing'

April 2026

A great place to live and work.

1. Introduction

1.1. The Governing Body is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we expect employees and others that we deal with who have serious concerns about any aspect of the School's work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.

All maintained Schools are required to have whistleblowing arrangements in place and governing body minutes should record that they do. This policy should be adopted by all maintained Schools.

1.2. Employees are often the first to realise that there may be something seriously wrong within the School. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to their employer. They may also fear harassment or victimisation. In these circumstances they may feel that it would be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

1.3. This Public Interest Disclosure Act 1998 encourages individuals to raise concerns about malpractices in the workplace and this policy document makes it clear that employees can raise serious concerns without fear of victimisation, subsequent discrimination or disadvantage and it is intended to encourage and enable employees to raise those concerns within the School rather than overlooking a problem.

1.4 This policy acknowledges the amendments made to the Public Interest Disclosure Act by the introduction of the Enterprise and Regulatory Reform Act 2013. It also incorporates the strengthened whistleblowing protections introduced by the Employment Rights Act 2025, including the explicit recognition of sexual harassment as a protected disclosure.

1.5. This policy applies to all employees and those contractors working on School premises, for example, agency staff or builders. It also covers suppliers and those providing services under a contract with the School or the Council. Members of the public are also encouraged to raise concerns, which will be responded to in accordance with this policy.

1.6. These procedures are in addition to any complaint's procedures and other statutory reporting procedures. The Headteacher is responsible for making service users aware of the existence of these procedures if and when necessary.

1.7. This policy has been discussed with the relevant trade unions and professional associations and has their support.

2. Aims and Scope of this Policy

2.1. This policy aims to:

- Encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice
- Provide avenues for you to raise those concerns and receive feedback on any action taken

- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- Reassure you that you will be treated with respect and protected from possible reprisals or victimisation if you have a reasonable belief that any disclosure is made "in the public interest". Any such behaviour will not be tolerated and will be treated as a disciplinary offence.
  Generally, 'in the public interest" means the wrongdoing will impact others, not just the individual raising the concern. For example, other colleagues, service users, residents or the general public.

2.2. The Confidential Reporting Code is intended to cover major concerns that fall outside the scope of other policies and procedures (such as the Grievance procedure, which is in place to enable you to lodge a grievance relating to your own contract of employment). Personal grievances (e.g. bullying, harassment, discrimination) are not usually covered by whistleblowing law, unless your particular case is in the public interest. If the Governing Body or the Council considers that a concern raised under the Confidential Reporting Policy should more properly be dealt with under the provisions of another policy (e.g. grievance, handling complaints of bullying, discrimination, harassment and victimisation or the appropriate corporate Complaints Policy for members of the public), the whistle-blower will be referred to that policy. Advice from relevant officers should be sought where required.

These major concerns that fall outside of other policies and procedures are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by someone who has a reasonable belief that any of the below matters are being, has been, or is likely to be, committed:

- Sexual harassment
- Conduct which is a criminal offence or a breach of law (e.g. fraud and corruption, including bribery, unauthorised use of public funds)
- Miscarriages of justice (e.g. an employee is dismissed for something that turned out to be a computer error)
- Health and safety risks, including risks to the public as well as other employees
- Risk or actual damage to the environment
- Sexual or physical abuse of clients, or
- Covering up any of the above wrongdoings

2.3. Therefore, any serious concerns that you have about any aspect of service provision or the conduct of other employees in the School, governors, officers of the Authority or members of the Council or, those acting on behalf of the Council can be reported under the Confidential Reporting policy. This may be about something that:

- Makes you feel uncomfortable in terms of known standards, your experience or the standards you believe the School or the Council subscribe to; or
- Is against the policies or standing orders of the School or the Council; or
- Falls below established standards of practice; or
- Amounts to improper conduct.

2.4. This policy does not replace the School's complaints procedure which is in place to address complaints about the School's services.

2.5. The Governing Body and the Council encourages you to raise your concerns under this procedure in the first instance. If you are not sure whether to raise a concern, you should discuss the issue with your line Manager, Headteacher, Trade Union representative or the Council's Monitoring Officer (contact details found further down).

2.6. Individuals who make a public interest disclosure ('whistleblow') within the context of protections provided within the Employment Rights Act 1996, (the protections are that the dismissal of an employee will be automatically unfair if the reason, or principal reason, for their dismissal is that they have made a "protected disclosure" and that workers are protected from being subjected to any detriment on the grounds that they have made a protected disclosure) would normally be expected to first raise the issue with their employer directly. However, they can also make disclosures to prescribed persons or bodies. You can view the Whistleblowing: List of prescribed people and bodies from the Government. Under the list, individuals need to raise the issue with the correct prescribed person for the sector or industry concerned. There are a number of prescribed people and bodies relating to local authorities depending on their areas of responsibility. Guidance in the list also provides information for individuals to help them identify the relevant auditor for a particular local authority.

3. Safeguards

Harassment or Victimisation

3.1. The Governing Body is committed to good practice and high standards and wants to be supportive of employees and others covered by this policy.

3.2. The Governing Body recognises that the decision to report a concern can be a difficult one to make. If what you are saying is true and you have reasonable belief that the disclosure is being made in the public interest, you should have nothing to fear because you will be doing your duty to your employer and those for whom you are providing a service.

3.3. The Governing Body will not tolerate any bullying, harassment or victimisation (including informal pressure) by managers and colleagues and will take appropriate action to protect you when you raise a concern in the public interest. Victimisation of a worker for raising a qualifying disclosure will be a disciplinary offence.

3.4. If you report your concerns via a disclosure, you have the right not to be dismissed or subjected to any other detriment because of it. Dismissal linked to such disclosures are automatically unfair.

3.5. Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary, sickness, capability or redundancy procedures that already affect you or may affect you in the future.

4. Confidentiality

4.1. All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. However, it must be appreciated that the investigation process may reveal the source of the information and a statement by the whistle-blower may be required as part of the evidence. This may mean that witness statements or correspondence is also disclosed. In these situations, the Governing Body or the Council (whoever you have raised your concerns with) will contact you and any additional witnesses to advise of this and to offer any guidance where necessary.

4.2. The Governing Body or the Council (whoever you have raised your concerns with) may need to reveal your identity and disclose information where there are legal proceedings following on from the whistleblowing disclosure and as above will inform you prior to this information being released.

4.3. If it is felt that allegations relate to serious criminal offences which the Police should investigate the Governing Body or the Council may also be required to disclose your identity to third parties.

5. Anonymous Allegations

5.1. This policy encourages you to put your name to your allegation whenever possible.

5.2. Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Governing Body or the Council. You should remember that wherever possible, confidentiality will be preserved.

5.3. In exercising this discretion, the factors to be taken into account would include the:

- Seriousness of the issues raised
- Credibility of the allegation; and
- Likelihood of confirming the allegation from attributable sources.

5.4. Anonymous whistle-blowers should also bear in mind that, if they do not make their name known, the Governing Body or the Council's Monitoring Officer will not know whose identity to keep confidential. It will also not be possible to provide direct feedback to them on the progress and outcome of any investigations.

6. False or Unproven Allegations

6.1. Where it is established, after investigation, that the allegations are unproven, the whistle-blower will be notified and the matter will be deemed "closed". It is expected that the issue will not be raised again unless new evidence becomes available.

6.2. If you make an allegation which you believe to be in the public interest, but it is not confirmed by the investigation, no action will be taken against you. If however, you make an allegation maliciously or for personal gain, disciplinary action may be taken against you. The Governing body will manage such situations using its agreed Disciplinary Procedure.

7. How to raise a concern

7.1. As a first step, you should normally raise concerns with your immediate manager or their superior. This depends however on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.

For example, if you believe that management is involved, you should approach the Chair of Governors. If the concern is relating to the Chair of Governors, then your concerns should be raised with the Council's Monitoring Officer.

7.2. Concerns may be raised verbally or in writing. Staff who wish to make a written report are invited to use the following format:

- The background and history of the concern (giving relevant dates)
- The reason why you are particularly concerned about the situation
- Provide as full and comprehensive information as is known at the time of the disclosure

If you raise your concern verbally, a written note will be taken in accordance with the above format.

7.3. The earlier you express the concern the easier it is to take action.

7.4. Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.

7.5. Advice and guidance on how matters of concern may be pursued can be obtained from:

- The School Office
- The Headteacher
- The Council's Monitoring Officer
- Trade Union Representatives

7.6. You may wish to consider discussing your concern with a colleague or your trade union representative first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns. However, once you have raised a concern under the Confidential Reporting Policy you should be mindful that any further discussions with other parties may impede the maintenance of confidentiality.

7.7. You may invite your trade union or work colleague to be present during any meetings or interviews in connection with the concerns you have raised.

8. How the Governing Body/ the Council will respond

8.1. The Governing Body or the Council (whoever you raised your concern with) will respond to your concerns. Do not forget that testing out your concerns is not the same as either accepting or rejecting them.

8.2. Where appropriate, the matters raised may:

- Be investigated thoroughly by management, internal audit, or through the disciplinary process
- Be referred to the Council or the police
- Be referred to the external auditor
- Form the subject of an independent inquiry

8.3. In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle which the Governing Body will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for example, child protection or discrimination issues) will normally be referred for consideration under those procedures.

8.4. Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.

8.5. Within ten working days of a concern being raised, the appropriate person under the policy with whom your concern has been raised will write to you:

- Acknowledging that the concern has been received
- Indicating how it is proposed to deal with the matter
- Giving an estimate of how long it will take to provide a final response
- Telling you whether any initial enquiries have been made
- Supplying you with information on staff support mechanisms, and
- Telling you whether any further investigation will take place, if not, why not

8.6. The amount of contact between those responsible for considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the Governing Body or the Council will seek further information from you.

8.7. Where any meeting is arranged, off-site if you so wish, you can be accompanied by a Professional Association or Trade Union representative or work colleague.

8.8. The Governing Body or the Council will take steps to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings the Governing Body or the Council will arrange for you to receive advice about the procedure.

8.9. The Governing Body accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, you will be informed of the outcomes of any investigation.

9. Monitoring Officer

9.1. The Monitoring Officer of the Council has overall responsibility for the maintenance and operation of the Council's Policy which this is compliant with. The Governing Body's policy is to be seen within the overall Council policy. That Officer maintains a record of concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report as necessary to the Council. They will also ensure that proper and timely

progress is made in dealing with any complaint and that the principles and requirements of this policy are met.

10. How the matter can be taken further

10.1. This policy is intended to provide you with an avenue within the Governing Body and the Council to raise concerns and it is hoped that you will be satisfied with any action taken. If you are not, and if you feel it is right to take the matter outside those who have been considering the matter, possible contact points are set out in the following section.

10.2. Before taking matters outside of the Governing Body or the Council, you may wish to take independent advice and the charity Protect (formerly known as Public Concern at Work) offers such facilities to employees. You can find more information including contact details on their website.

10.3. The following are possible external contact points:

- The designated independent person or organisation
- The Schools or Council's external auditor
- Your professional association or trade union representative
- Your local Citizen's Advice Bureau
- Relevant professional bodies or regulatory organisations
- A relevant voluntary organisation
- The police

10.4. If you do take the matter outside the Governing Body or the Council you should ensure that you do not disclose confidential information.

Further contact information outside of the Governing Body:

CBC Monitoring Officer
EMAIL: monitoring.officer@centralbedfordshire.gov.uk

NSPCC National Whistleblowing Helpline for employees

TEL: 0808 800 5000

EMAIL: help@nspcc.org.uk
WEBSITE: NSPCC Whistleblowing Advice Line