



WHISTLEBLOWING POLICY

2026-2027

Status and Review Cycle	Safeguarding and employment policy informed by statutory guidance and whistleblowing legislation / annual review
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Relevant linked policies	Child Protection and Safeguarding; Staff Behaviour / Code of Conduct; Managing Allegations Against Staff; Low-Level Concerns; Complaints; Data Protection; Health and Safety; Anti-Bribery / Finance procedures

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1. Purpose and Policy Statement

Sevenoaks Prep is committed to conducting its work with honesty, integrity, transparency and care for pupils. The School expects all adults working in or on behalf of the School to maintain high standards and to speak up where they have a genuine concern that wrongdoing, malpractice, unsafe practice or a safeguarding failure has occurred, is occurring, or is likely to occur.

The School recognises that safeguarding failures can occur where adults feel unable to challenge practice or raise concerns. This policy is intended to encourage staff and other workers to raise serious concerns at the earliest opportunity, normally within the School in the first instance, so that concerns can be considered and addressed promptly. It supports a culture in which staff feel able to raise concerns without fear of reprisal, victimisation, discrimination, disadvantage or dismissal.

The School is committed to maintaining an open and transparent culture in which concerns are welcomed, listened to and acted upon appropriately. Staff should feel confident that they will be supported when raising genuine concerns in the public interest.

The policy should be read alongside the School's Child Protection and Safeguarding Policy, Staff Behaviour / Code of Conduct, Managing Allegations Against Staff procedures, Low-Level Concerns procedures, Complaints Policy and Data Protection Policy.

2. Scope and Application

This policy applies to employees, governors, supply staff, trainee teachers, agency workers, contractors, casual workers, consultants, peripatetic staff, volunteers and any other adults working in or on behalf of the School. It also applies to former workers where they are raising a concern about wrongdoing connected with their work at the School.

The School recognises that not every person covered by this policy will necessarily have identical statutory whistleblowing protection under employment law. However, the School expects all concerns raised under this policy to be treated seriously, sensitively and fairly.

3. What is Whistleblowing?

Whistleblowing is the raising of a genuine concern about suspected wrongdoing or danger connected with the School's activities where the concern is in the public interest. It is sometimes described as making a disclosure in the public interest.

A whistleblower is not expected to prove that wrongdoing has occurred. They should, however, have reasonable grounds for the concern and should raise it honestly, promptly and in accordance with this policy where possible.

4. What may be raised under this Policy?

Concerns may include, but are not limited to:

- a criminal offence, including fraud, theft, bribery, corruption or financial irregularity
- failure to comply with a legal, regulatory or statutory obligation
- miscarriage of justice
- endangerment of health and safety, including unsafe working practices

- damage to the environment
- the deliberate concealment of information about any of the above
- serious breaches of the School's policies, standards, values or professional expectations
- safeguarding failures, poor or unsafe safeguarding practice, or failure to act on a child protection concern
- concerns about staff, supply staff, trainee teachers, volunteers, contractors or other adults working with pupils
- conduct which may undermine inspection, regulatory compliance or the safe and effective running of the School
- unethical conduct or conduct likely to bring the School into disrepute

Where a concern relates to a child's immediate safety or welfare, staff must follow the Child Protection and Safeguarding Policy immediately and must not delay action by attempting to resolve whether the matter is a whistleblowing concern.

5. What is not covered by this Policy?

This policy is not intended to replace other School procedures. In particular:

- personal employment concerns should normally be raised through the Grievance Procedure
- concerns about a pupil's welfare should be raised through the Child Protection and Safeguarding procedures
- concerns that a member of staff or other adult may have harmed a child, may pose a risk of harm, or may be unsuitable to work with children should be raised through the Managing Allegations Against Staff procedure
- concerns that do not meet the harm threshold but suggest that an adult may have acted in a way inconsistent with the Staff Behaviour / Code of Conduct should be raised through the Low-Level Concerns procedure
- parental complaints should normally be considered under the Complaints Policy

If a member of staff is unsure which route applies, they should speak to the Head, DSL, Bursar, Chair of Governors, Governor Lead for this policy, or another senior leader. The most important principle is that concerns are raised and acted on without delay.

6. Safeguarding, Allegations and Low-Level Concerns

All staff and volunteers should feel able to raise concerns about poor or unsafe safeguarding practice and potential failures in the School's safeguarding provision. Such concerns will be taken seriously by the School's leadership.

If the concern is about the conduct of an adult working with children, staff must use the correct safeguarding route:

- where the concern or allegation may meet the harm threshold, report it immediately to the Head; if the concern relates to the Head, report it to the Chair of Governors; if there is a conflict of interest or the Head is also the sole proprietor, report directly to the LADO
- where the concern does not meet the harm threshold, share it in accordance with the School's Low-Level Concerns procedure

- if staff believe appropriate safeguarding action is not being taken, they should use this whistleblowing policy and may contact the LADO or the NSPCC Whistleblowing Advice Line

The School will not treat a genuine safeguarding concern as a nuisance or disloyal act.

Safeguarding culture depends on adults being willing to notice, record, report and challenge unsafe practice.

7. Confidentiality, Anonymity and Data Protection

The School hopes that staff will feel able to raise concerns openly. If a whistleblower asks for their identity to be kept confidential, the School will make every reasonable effort to do so, consistent with investigating the concern properly, safeguarding pupils, complying with legal obligations and ensuring fairness to others involved.

Anonymous disclosures will be considered, but anonymity may make it more difficult to investigate the concern, seek clarification or provide feedback. Staff are encouraged to provide enough information to allow the School to assess the concern properly.

Records relating to whistleblowing concerns will be kept confidential and held securely in accordance with data protection laws. Information will be shared only with those who need to know in order to respond to the concern, protect pupils, comply with legal duties, manage employment matters or obtain appropriate advice.

8. Protection from Detriment

No worker should suffer dismissal, disciplinary action, threats, bullying, harassment, victimisation, disadvantage or any other detriment because they have raised a genuine concern under this policy.

Any person who victimises or retaliates against a whistleblower may be subject to disciplinary action. Staff who believe they have suffered detriment because they raised a concern should report this immediately to the Head, Chair of Governors, Governor Lead for this policy or another suitable senior person.

9. How to Raise a Concern Internally

Concerns should normally be raised as soon as possible. Staff may raise concerns orally or in writing. Written concerns should be clear and factual, setting out the nature of the concern, relevant dates, people involved, any supporting evidence, whether anyone may be at immediate risk and any steps already taken.

Which route should I use?

- A child may be at risk: follow the Child Protection and Safeguarding Policy immediately.
- An identifiable adult may have harmed a child, may pose a risk of harm, or may be unsuitable to work with children: report immediately under the Managing Allegations Against Staff Policy.

- An adult's conduct causes concern but does not appear to meet the harm threshold: use the Low-Level Concerns procedure.
- The concern is that the School, its leadership or another person is failing to respond properly, concealing wrongdoing or maintaining unsafe practice: use the Whistleblowing Policy.
- Unsure: report immediately to the Head or DSL. The recipient will determine the correct route without requiring the reporter to resubmit the concern.

Situation	Who to contact first	Alternative or escalation route
General whistleblowing concern	Line manager, Head, Deputy Head, Head of Pre-Prep or Bursar	Governor Lead for Whistleblowing or Chair of Governors
Concern about safeguarding provision or unsafe safeguarding culture	DSL, Head or Deputy Head, as appropriate	Chair of Governors, Safeguarding Governor, LADO or NSPCC Whistleblowing Advice Line
Concern about a member of staff, supply staff, trainee teacher, volunteer or contractor that may meet the harm threshold	Head. If the Head is unavailable, report immediately to the DSL and Chair of Governors so that immediate safeguarding action can be taken and advice obtained from the LADO. The absence of the Head must not delay a report or protective action.	Chair of Governors if the concern is about the Head; LADO where required
Low-level concern about an adult working in or on behalf of the School	Head	Concerns about the Head should be reported to the Chair of Governors. If there is doubt about whether the harm threshold is met, LADO advice should be sought
Concern about the Head	Chair of Governors	Named Governor Lead for Whistleblowing or LADO where safeguarding threshold/conflict applies
Concern about a governor	Named Governor Lead for Whistleblowing	Vice Chair of Governors

Situation	Who to contact first	Alternative or escalation route
Concern about Vice Chair of Governors	Chair of Governors	Appropriate external body or professional advice line, depending on the concern
Safeguarding concern or allegation about the Chair of Governors	Safeguarding Governor	Another independent unconflicted governor or LADO without avoidable delay where the harm threshold may be met
Non-safeguarding whistleblowing concern about the Chair of Governors	Vice Chair of Governors	Another independent, unconflicted governor, regulator or independent advice body

10. How the School will Respond

The response will depend on the nature and seriousness of the concern. The School will act proportionately, fairly and without avoidable delay. The School may take one or more of the following steps:

- the recipient will acknowledge the concern as soon as reasonably practicable, unless it was raised anonymously and no contact route is available
- the whistleblower will be told, where lawful and appropriate, who is handling the concern and whether it has been referred into another procedure
- confidentiality may prevent the School from providing details of disciplinary, safeguarding or personal-data outcomes
- carry out an initial assessment to decide whether the concern falls under this policy or another procedure
- take immediate safeguarding, health and safety or risk management action where needed
- appoint an appropriate senior person or external adviser to investigate
- refer the matter to the LADO, children's social care, police, Health and Safety Executive, HMRC, Charity Commission, DfE, ISI, local authority or another relevant body where appropriate
- keep a written record of the concern, decisions, action taken and outcome
- review whether any changes are needed to policy, training, supervision, culture, governance or internal controls

The whistleblower may be accompanied by a colleague or trade union representative at meetings under this policy. Any companion must respect the confidentiality of the disclosure and any investigation.

11. External Reporting and Independent Advice

The School encourages staff to use internal reporting routes where possible, so that concerns can be addressed promptly. However, nothing in this policy requires a person to report internally first where they reasonably believe there is an immediate risk, a serious conflict of interest, concealment, victimisation, destruction of evidence, or another sound reason why the internal route is inappropriate. Anyone considering an external disclosure is encouraged to obtain independent advice about the appropriate recipient and applicable legal protection.

Contact	Use when	Details
NSPCC Whistleblowing Advice Line	For staff who are concerned about the way a child-protection concern is being handled, who feel unable to raise the matter internally, or who believe that appropriate action is not being taken. Staff should check the NSPCC's current published contact details before use.	0800 028 0285; help@nspcc.org.uk
Protect, independent whistleblowing charity	Independent confidential advice on whistleblowing and protected disclosures	protect-advice.org.uk; 020 3117 2520
LADO / Local Authority Designated Officer	Concern or allegation about an adult working with children that may meet the harm threshold	Use Kent LADO / local authority published routes
Department for Education	Independent school registration or regulatory matters, where appropriate	DfE independent schools / safeguarding division routes
ISI	Inspection-related or regulatory concerns within ISI's remit, where appropriate	info@isi.net or ISI published contact routes
Police / emergency services	Immediate danger, criminal offence or urgent safeguarding risk	999 in an emergency; 101 for non-emergency police matters
Health and Safety Executive, HMRC or other prescribed body	Concerns within that body's regulatory remit	Use the relevant regulator's published route

12. Malicious or Knowingly False Disclosures

A staff member who raises a concern honestly and reasonably will not be penalised if the concern is not upheld. However, if the School concludes that a person has knowingly made a false

allegation maliciously, or has acted in bad faith or for personal gain, the matter may be addressed under the School's disciplinary procedures or other appropriate process.

The School will be careful not to confuse an unproven concern with a malicious concern. Unsubstantiated concerns may still have been raised in good faith and may still identify learning for the School.

13. Record Keeping, Monitoring and Review

The School will maintain confidential records of whistleblowing concerns, including the concern raised, assessment of the appropriate route, actions taken, decisions reached, referrals made and any learning or policy changes. Records will be retained securely in line with the School's data retention arrangements.

The Governor Lead and/or governing body will review whistleblowing arrangements at least annually. The governing body minutes should record the School's whistleblowing arrangements and the people in and outside the School whom staff may contact to raise concerns.

14. Responsibilities

Role	Responsibilities
Governors	Approve and oversee the whistleblowing policy; ensure staff have clear internal and external routes; minute the arrangements; monitor culture and compliance.
Governor Lead for Whistleblowing	Act as a named governor contact for concerns; support annual review; ensure themes and learning are considered without compromising confidentiality.
Head	Ensure the policy is implemented; ensure concerns are investigated or referred appropriately; protect whistleblowers from detriment; ensure learning is acted upon.
DSL and Safeguarding Team	Respond immediately to safeguarding concerns; advise on safeguarding routes; liaise with LADO, children's social care or police where appropriate.
Safeguarding Governor	Safeguarding Governor: Provides safeguarding oversight on behalf of the governing body and may receive concerns where appropriate, whilst maintaining suitable operational boundaries.
Bursar / Data Protection Officer	Support investigation of financial, operational or data protection concerns where appropriate; ensure records are kept securely.

Role	Responsibilities
All staff and adults working in or for the School	Raise concerns promptly; act immediately where a child may be at risk; maintain confidentiality; cooperate with investigations; do not victimise or retaliate against whistleblowers.

15. Staff awareness and training

The School will ensure that staff, including temporary staff and contractors where appropriate, are made aware of this policy and know:

- what protection is available when raising a genuine concern
- the types of wrongdoing and malpractice covered by this policy
- the internal routes for raising a concern
- the safeguarding routes for allegations, low-level concerns and child protection concerns
- the external advice and reporting routes available where internal reporting is not appropriate or concerns are not being addressed
- that whistleblowing is part of a safe, reflective and accountable safeguarding culture

This policy will be made available to staff through induction, annual safeguarding updates and the School's usual policy publication routes. Staff will be reminded that they should never ignore a concern because they are unsure which procedure applies.

16. Sources considered and key updates

This 2026/2027 version has been updated to reflect:

- DfE guidance that schools should have whistleblowing arrangements, appoint at least one staff contact and at least one governor contact, inform every staff member of the arrangements and ensure staff know internal and external reporting routes
- DfE whistleblowing policy guidance published in June 2025, including the DfE's approach to defining whistleblowing, handling disclosures and handling data
- KCSIE 2026, including the requirement for staff to know safeguarding systems, the expectation that whistleblowing is included within staff behaviour/code of conduct arrangements, and the expectation that staff and volunteers can raise poor or unsafe safeguarding practice
- KCSIE 2026 Part Four expectations around adult concerns, allegations, low-level concerns, supply staff, trainee teachers, volunteers and contractors
- ACAS guidance on protected whistleblowing, detriment and protection from unfair dismissal or detriment for qualifying disclosures
- ISI inspection context and ISI's own whistleblowing policy wording on scope, confidentiality, protection from detriment, external disclosures and support for whistleblowers