



Westbourne
House School

CHICHESTER

WHISTLEBLOWING POLICY

This is the policy of Westbourne House School, which incorporates the Prep School, Pre-Prep, Early Years Foundation Stage as well as provision for boarding

Introduction

Westbourne House seeks to conduct its business honestly and with integrity at all times. However, we acknowledge that all organisations face the risk of their activities going wrong from time to time, or of unknowingly harbouring malpractice. We believe we have a duty to take appropriate measures to identify such situations and attempt to remedy them. By encouraging a culture of openness and accountability with the organisation, we believe we can help prevent such situations occurring.

We expect all staff to maintain high standards in accordance with our Staff Behaviour Code of Conduct Policy and Employee Handbook and to report any wrongdoing that falls short of these fundamental principles. It is the responsibility of all workers to raise any concerns that they might have about malpractice or safety within the workplace.

The aim of this policy is to ensure that our staff are confident that they can raise any matters of genuine concern without fear of reprisals in the knowledge that they will be taken seriously and that the matters will be investigated appropriately and regarded as confidential.

The following guidance sets out the procedure by which staff can report concerns about workplace practices.

This policy is for guidance only and does not form part of staff's contract of employment.

Legislative Framework

Whistleblowing is the disclosure of information by a worker which relates to some danger, fraud, bribery or other illegal or unethical conduct in the workplace. The Employment Rights Act 1996 as amended by the Public Interest Disclosure 1998 governs the making of disclosures concerning workplace activities and is intended to protect a worker who blows the whistle on bad practice from being subjected to any detriment or unfairly dismissed as a result.

Personnel Responsible for Implementing of Policy

The Governing Board has overall responsibility for Westbourne House's policy on whistleblowing, but has delegated day-to-day responsibility for overseeing and implementing it to the Designated Whistleblowing Officers (DWOs), currently the Headmaster, Deputy Head and Bursar. In cases of safeguarding concerning whistleblowing the responsibility lies with the Headmaster.

Responsibility for monitoring and reviewing the operation of the policy and any recommendations for change within the organisation resulting from investigations into complaints under the policy lies with the Headmaster or Governing Board.

The Senior Management Team (SMT) have a specific responsibility to facilitate the operation of this policy and to ensure that workers feel able to raise concerns without fear of reprisals in accordance with the procedure set down below. All workers are responsible for the success of this policy and should ensure that they take steps to disclose any wrongdoing or malpractice of which they become aware. If staff have any questions about the content or application of this policy, they should contact the DWOs.

Who is covered by the policy?

This policy applies to all individuals working for the school, at all levels and grades – including EYFS, whether they are senior managers, employees, contractors, trainees or agency staff (collectively known as workers in this policy).

What disclosures are covered?

This policy is distinct from our Staff Complaints, Grievance & Discipline Policy. If you have a complaint relating to your personal circumstances in the workplace then you should use the procedure as set out in the Staff Complaints, Grievance & Discipline Policy. Concerns about malpractice within the organisation which affects or could affect, for example, parents, pupils, members of the public or other members of staff should be raised using the procedure set out below.

You should use this policy if you have genuine concern that there are reasonable grounds for believing that:

- A criminal offence has been committed, is being committed or is likely to be committed
- A person has failed, is failing, or is likely to fail to comply with their legal obligation
- A miscarriage of justice has occurred, is occurring, or is likely to occur
- The health and safety of any individual has been, is being, or is likely to be endangered
- The environment has been, is being or likely to be damaged
- Another member of staff is using inappropriate behaviour towards a child (including those in the EYFS - as per the Early Years Foundation Stage Framework 2025)
- Any of the above are being or likely to be deliberately concealed
- That there is 'low level concern' - as per KCSIE Sept 2025

In the context of Westbourne House's business, particular concerns which may fall within the terms of this policy include, for example breach of our code of conduct, confidentiality, the provision of negligent advice, financial fraud, harassment occurring to others and health and safety.

In general, this policy covers actions or omissions that staff may consider are illegal, contrary to policy or established procedure or outside the scope of an individual's authority, actions that could damage Westbourne House's reputation and conflicts of interest.

However, only disclosures concerning those actions falling strictly within the categories listed above will be eligible for the relevant statutory protection.

The school values any concerns reported in good faith under this procedure. If staff are uncertain whether the matters concerning them are within the scope of this policy (for example, if staff are suspicious but uncertain as to whether the law has been broken, or whether a person is acting outside the scope of their authority) the School encourages staff to report the concerns to the DWO in accordance with the procedure set out below.

To whom should a disclosure be made?

The School recognises that staff may not feel comfortable discussing concerns direct with a line manager/Head of Department etc. For the purpose of this procedure staff are asked, in the first instance, to raise concerns be that 'low level', about any form of malpractice falling within the categories outlined above with the DWO, who is currently the Headmaster, Deputy Head or the Bursar.

Concerns deemed 'low level' should be reported as soon as possible to the Headmaster; however, it is never too late to share a low-level concern. If the Headmaster is not available, the information should be reported to the Chair of Governors. If a low-level concern has been reported to the DSL in first instance, they will inform the Headmaster of the details as soon as possible.

For allegations involving supply staff and contractors – the agency/employment business must be kept fully informed and involved, so any potential patterns of inappropriate behaviour can be identified.

Low-level concerns about the DSL should be reported to the Headmaster and those about the Headmaster should be reported to the Chairman of Governors.

The DWOs report directly to the Board of Governors. If the disclosure is extremely serious or in any way involves the DWO you should report it directly to the Chairman of the Governors. In safeguarding cases advice should be sought from the Headmaster.

The school will always endeavour to handle investigations promptly and fairly, but if staff have made a disclosure under the procedure outlined below and are not satisfied with the investigation or its conclusion, staff should write directly to the Chairman of Governors detailing the concern(s).

The School envisages that disclosures will be most likely to relate to the actions of workers, but they may also relate to the actions of a third party such as a parent. It may be appropriate for staff to raise concerns directly with the third party where it is believed that the malpractice

identified relates solely or mainly to their conduct or a matter, which is their legal responsibility. However, the School would ask that staff consult the DWO before speaking to a third party.

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any workplace wrongdoing. It is therefore hoped that it will not be necessary for workers to alert external organisations. However, in very serious circumstances, those that include safeguarding, or following an internal report, which has not been addressed, we recognise that it may be appropriate for staff to report concerns to an external body/regulator such as the LADO, NSPCC, ISI, DfE etc. The government has prescribed a list of appropriate bodies for such external reporting: e.g. the Environment Agency and the Health and Safety Executive.

How should a disclosure be made?

Staff can raise concerns with the DWO in writing, stating that the Whistleblowing Policy is being used and specify whether they wish for their identity to be kept confidential.

The DWO will acknowledge receipt of the formal written disclosure within five working days and keep a record of further action taken. Staff are entitled to be accompanied by a workplace colleague or union representative at any meeting with the DWO under this procedure. The companion will be asked to respect the confidentiality of the disclosure and any subsequent investigation.

The School recognises that disclosures made under this policy may involve highly confidential and sensitive matters and that staff may prefer to make an anonymous disclosure. However, the School cannot guarantee to investigate all anonymous allegations. Proper investigation may prove impossible if the investigator cannot obtain further information from staff, give feedback, or ascertain whether the disclosure was made in good faith. It is preferable for whistleblowers to reveal their identity to the DWO and measures can be taken to preserve confidentiality as appropriate.

Low level concerns about staff members should be reported to the Headmaster using the Low-Level Concerns Form issued by the DSL.

If a staff member feels unable to raise an issue with a DWO or the Headmaster, or feels that their genuine concerns are not being addressed, they can use the following channels:

- NSPCC whistleblowing advice line: 0800 0280285 (8.00am to 8.00pm, Monday to Friday and 9.00am to 6.00pm at weekends). Email: help@nspcc.org.uk. Address: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.
- Ofsted provides guidance on how to make complaints about a provider: <https://www.gov.uk/government/organisations/ofsted/about/complaints-procedure>
- General guidance on whistleblowing can be found via <https://www.gov.uk/whistleblowing>

Investigation of a disclosure

Westbourne House is committed to investigating disclosures fully, fairly, quickly and confidentially where circumstances permit. Following the submission of a formal written disclosure, the DWO will acknowledge receipt within five working days and make appropriate arrangements for investigation.

The length and scope of the investigation will depend on the subject matter of the disclosure. In most instances, the DWO will carry out an initial assessment of the disclosure to determine whether there are any grounds for a more detailed investigation to take place or whether the disclosure is for example based on erroneous information. In any event a report will be produced and where appropriate, the individual who made the disclosure will receive a copy.

If a longer investigation is considered necessary, the School will usually appoint an investigator or investigative team including personnel with experience of operating workplace procedures or specialist knowledge of the subject matter of the disclosure. Separate personnel will be asked to make a judgement on the report submitted by the investigator and recommendations for change will be suggested by the team to enable the school to minimise the risk of the recurrence of any malpractice or impropriety which has been uncovered.

So far as the DWO considers it appropriate and practicable, the individual who made the disclosure will be kept informed of the progress of the investigation. However, the need for confidentiality may prevent the school giving specific details of the investigation or actions taken. It is not normally appropriate to set a specific time frame for completion of investigations in advance, as the diverse nature of disclosures contemplated makes this unworkable.

The School recognises that there may be matters that cannot be dealt with internally and in respect of which external authorities will need to be notified and become involved either during or after our investigation. The School will endeavour to inform staff if a referral to an external authority is about to or has taken place although may need to make such a referral without your knowledge or consent if we consider it appropriate.

Confidentiality

Every effort will be made to keep the identity of an individual who makes a disclosure under this policy confidential, at least until any formal investigation is underway. In order not to jeopardise the investigation into the alleged malpractice; staff will also be expected to keep the fact that they have raised a concern, the nature of the concern and the identity of those involved confidential. There may, however, be circumstances in which it will be necessary to identify the staff member's identity. This may occur in connection with associated disciplinary or legal investigations or proceedings.

If, in the School's view, such circumstances exist, every effort will be made to inform the staff member that their identity is likely to be disclosed. If it is necessary for staff to participate in an investigation, the fact that they made the original disclosure will, so far as is reasonably

practicable, be kept confidential and all reasonable steps will be taken to protect staff from any victimisation or detriment as a result of having made a disclosure. It is likely however that the role as whistleblower could still become apparent to third parties during the course of an investigation.

Protection and support for whistleblowers

No member of staff who raises genuinely held concerns, in good faith, under this procedure would be dismissed or subjected to any detriment as a result of such action. Detriment includes unwarranted disciplinary action and victimisation. If staff believe that they are being subjected to a detriment within the workplace as a result of raising concerns under this procedure, they should inform the DWO immediately. Workers who victimise or retaliate against those who have raised concerns under this policy will be subject to disciplinary action.

If an investigation under this procedure concludes that a disclosure has been made maliciously, vexatiously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action. Those choosing to make disclosures without following this procedure or anonymously may not receive the protection outlined above.

Corrective action and compliance

As part of the investigation into disclosures made under this policy, recommendations for change will be invited from the investigative team to enable the school to minimise the risk of the recurrence of any malpractice or impropriety, which has been uncovered.

The investigative team will be responsible for reviewing and implementing these recommendations in the future and for reporting on any changes required to the Governing Board.

Monitoring and review

The School will review and monitor the effectiveness and compliance of this policy (and appendices – if appropriate). This policy will be kept up-to-date and amended to take account of legislative and regulatory changes.

Last Review Date	Next Review Date	Reviewer(s)
September 2025	September 2026	Headmaster Deputy Head Bursar Head of Pre-Prep HR Manager Designated Safeguarding Lead