



storybrook

Whistleblowing Policy





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1. Introduction

This policy is designed to encourage employees, volunteers, and contractors of Storyybrook, to report suspected or actual occurrence of illegal, unethical, or inappropriate events (behaviours or practices) without retribution.

This policy reflects the whistleblowing protections contained within the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998 (PIDA). These provisions protect workers from dismissal or detrimental treatment where they make a protected disclosure in accordance with the law.

A worker may qualify for statutory whistleblowing protection where they reasonably believe that the information they disclose tends to show relevant wrongdoing, reasonably believe that the disclosure is in the public interest, and make the disclosure through an appropriate route.

Relevant wrongdoing may include:

- a criminal offence
- a failure to comply with a legal obligation
- a miscarriage of justice
- danger to the health or safety of any individual
- damage to the environment
- sexual harassment
- deliberate concealment of information relating to any of the above

A worker does not need to prove that wrongdoing has occurred before raising a concern. They should have reasonable grounds for the concern and should raise it through the appropriate reporting route. Storyybrook encourages individuals to speak up as soon as possible where they have concerns about wrongdoing, unsafe practice or risks to others.

2. Scope

Storyybrook is committed to creating an open and transparent culture in which concerns about wrongdoing, malpractice, unsafe practice or risks to others can be raised safely and taken seriously.

This policy may be used by employees, workers, agency staff, trainee teachers and other trainees, contractors, volunteers, governors and other individuals working in or on behalf of Storyybrook who wish to raise a concern about wrongdoing or malpractice.

Storyybrook also welcomes concerns raised by parents, carers and other members of the school community. However, depending on the nature of the concern, another procedure, such as the Complaints Policy, Safeguarding and Child Protection Policy or Managing Allegations Policy, may provide the more appropriate route.

The ability to raise a concern under this policy is wider than the statutory protection provided by whistleblowing law. Statutory whistleblowing protection applies to individuals who fall within the legal definition of a worker and who make a protected disclosure in accordance with the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998.





The statutory definition of worker for whistleblowing purposes is broad and may include employees, agency workers, certain trainees and some contractors. Whether an individual qualifies for statutory protection will depend on their employment status and the circumstances of the disclosure.

Volunteers, parents, carers and some other individuals who are permitted to raise concerns through Storybrook's whistleblowing arrangements may not fall within the statutory definition of a worker and therefore may not qualify for statutory whistleblowing protection. Their concerns will nevertheless be taken seriously and handled appropriately in accordance with this policy and any other relevant safeguarding or school procedure.

No individual should be discouraged from raising a genuine concern because they are uncertain whether they meet the statutory definition of a worker or whether their concern would amount to a protected disclosure. Storybrook will respond appropriately to concerns raised and will direct individuals to the most appropriate procedure where necessary.

This policy may be used to raise concerns about matters including:

- criminal activity or suspected criminal activity
- failure to comply with a legal or regulatory obligation
- miscarriages of justice
- danger to the health or safety of any person
- safeguarding failures or unsafe practice
- sexual harassment
- financial malpractice, fraud or corruption
- serious breaches of professional standards
- serious misconduct or abuse of authority
- damage to the environment
- deliberate concealment of wrongdoing
- attempts to prevent or discourage an individual from raising a legitimate concern

Whistleblowing and other procedures

It is important to distinguish between a whistleblowing disclosure and other types of concern or complaint. The appropriate procedure will depend on the nature of the concern and who or what it relates to.

Whistleblowing relates to information about wrongdoing that the individual reasonably believes is in the public interest. This may include concerns about unlawful conduct, safeguarding failures, danger to health and safety, financial malpractice, serious professional misconduct, systemic failures, abuse of authority or the deliberate concealment of wrongdoing.

A grievance normally concerns an individual's own employment position or personal circumstances, such as their terms and conditions, working relationships, treatment at work or another matter affecting them personally. Such concerns should normally be raised through Storybrook's grievance or other relevant employment procedure. A matter affecting an individual personally may nevertheless amount to whistleblowing where the statutory requirements for a protected disclosure are met, including where the individual reasonably believes that raising the matter is in the public interest.





A complaint normally concerns dissatisfaction with the school's provision, actions, decisions or services and may be raised by a parent, carer or another person through Storyybrook's Complaints Policy. A complaint may contain safeguarding or whistleblowing information, in which case the relevant safeguarding or whistleblowing procedure will also be followed.

A safeguarding concern about the safety or welfare of a child must be managed in accordance with Storyybrook's Safeguarding and Child Protection Policy.

A concern about the behaviour or conduct of an adult working in or on behalf of Storyybrook, including conduct that may constitute a low-level concern or may meet the harm threshold, must be reported through the appropriate route set out in Storyybrook's Low-Level Concerns Policy and Managing Allegations Policy.

Whistleblowing may be the appropriate route where the concern relates to poor or unsafe safeguarding practice, systemic safeguarding failures, a failure to act on safeguarding concerns, inappropriate organisational practice, the concealment of safeguarding information or concerns that appropriate safeguarding procedures are not being followed.

These categories are not mutually exclusive. A concern may engage more than one procedure and, where appropriate, procedures may operate alongside one another. Storyybrook will ensure that safeguarding action is not delayed while the appropriate procedure is determined.

Individuals are not expected to determine the legal status of their concern or identify the correct policy before speaking up. Where an individual raises a concern under this policy that would more appropriately be considered under another procedure, Storyybrook will explain this and ensure that the concern is directed to the appropriate process. No genuine concern will be disregarded solely because it was initially raised through the wrong procedure.

3. Safeguarding

Storyybrook recognises that whistleblowing is a vital part of safeguarding and plays a key role in protecting children from harm. All staff have a duty to raise concerns about poor or unsafe practice, including concerns about the behaviour or conduct of colleagues, volunteers or other adults working with children.

Where a concern relates to the conduct of an adult working in or on behalf of Storyybrook, including a concern that may constitute a low-level concern or may meet the harm threshold, it must be reported through the appropriate route set out in Storyybrook's Low-Level Concerns Policy and Managing Allegations Policy.

Concerns about a member of staff or another adult working in or on behalf of the school should normally be reported to the Headteacher.

Where the concern relates to the Headteacher, including where the Headteacher is acting as the Designated Safeguarding Lead, the concern must not be reported to or managed by the Headteacher. It must be reported directly to the Proprietor or the person formally designated by the Proprietor to receive and manage concerns about the Headteacher. Where the Chair of Governors has been formally designated by the Proprietor for this purpose, the concern may be reported directly to the Chair.





Where the concern relates to a governor, it should be reported to the Chair of Governors and the Proprietor, unless either person is implicated or there is an actual or perceived conflict of interest.

Where the concern relates to the Chair of Governors, it must be reported directly to the Proprietor or another appropriately designated person who is independent of the concern and free from any actual or perceived conflict of interest.

Where the concern relates to the Proprietor, or where more than one member of the Proprietor body is implicated, the person or persons who are the subject of the concern must not be involved in receiving, assessing, investigating or determining the school's response. Where the concern relates to safeguarding and the harm threshold may be met, or where there is uncertainty about the appropriate safeguarding response, advice must be sought from the Local Authority Designated Officer (LADO). Appropriate independent case-management arrangements will be established in accordance with Storyybrook's Managing Allegations Policy.

No individual who is the subject of a concern, directly implicated in it or otherwise subject to an actual or perceived conflict of interest will be responsible for determining how that concern is managed.

Nothing within these reporting arrangements prevents an individual from using an appropriate external whistleblowing route where they reasonably believe that they cannot raise the concern internally, where they believe that their concern is not being addressed appropriately, or where an external disclosure is otherwise permitted by law.

In an SEMH setting, staff understand that behaviour may be a form of communication, and that concerns about staff practice or responses to pupil behaviour may indicate safeguarding risks. All concerns will be taken seriously and responded to in a timely and appropriate manner.

This policy should be read in conjunction with Storyybrook's Safeguarding and Child Protection Policy, Low-Level Concerns Policy and Managing Allegations Policy.

4. Protection from detriment and victimisation

Storyybrook is committed to creating a culture in which individuals can raise genuine concerns without fear of retaliation, victimisation or adverse treatment.

Storyybrook will not tolerate any person being subjected to detrimental treatment because they have raised a genuine concern under this policy, assisted with a whistleblowing matter or provided information as part of an enquiry or investigation.

Detrimental treatment may include, but is not limited to:

- dismissal or threats of dismissal
- disciplinary action or threats of disciplinary action because a concern has been raised
- harassment, bullying, intimidation or victimisation
- threats, hostility or deliberate exclusion
- reduction in hours, responsibilities or opportunities





- unreasonable changes to duties or working arrangements
- withholding training, promotion or professional development opportunities
- unfair treatment in appraisal, performance management or recruitment processes
- damage to professional reputation
- pressure to withdraw, alter or remain silent about a concern
- any other adverse treatment arising because an individual has spoken up

Workers who make a protected disclosure in accordance with the Employment Rights Act 1996 may have statutory protection from detriment. Employees are also protected from unfair dismissal where the dismissal is because they have made a protected disclosure.

Storyybrook's commitment to preventing retaliation extends more broadly to individuals who are permitted to raise genuine concerns through this policy, including those who may not fall within the statutory definition of a worker.

Protection from detrimental treatment does not depend on the concern ultimately being substantiated. An individual will not be penalised simply because, following appropriate consideration or investigation, their concern is found to be mistaken, unfounded or unsubstantiated.

Where there is clear evidence that an employee has deliberately and knowingly provided false information, this will be considered separately in accordance with section 5 of this policy.

If an individual believes they are being treated adversely

Any individual who believes that they have been subjected to detrimental treatment, victimisation, harassment, retaliation or other adverse treatment because they raised or supported a concern should report this as soon as reasonably possible.

Where appropriate, this should normally be reported to the Headteacher.

Where the Headteacher is responsible for, implicated in or otherwise conflicted in relation to the alleged detrimental treatment, the matter must be reported directly to the Proprietor or the person formally designated by the Proprietor to receive such concerns. The Chair of Governors may receive the concern where formally designated for this purpose.

Where the Proprietor, Chair of Governors or another person who would ordinarily receive the concern is implicated, the concern must be directed to an appropriate independent and non-conflicted person or, where appropriate, through an external reporting route.

No person who is alleged to have subjected an individual to detrimental treatment, or who is otherwise subject to an actual or perceived conflict of interest, will determine how that concern is managed.

Storyybrook will take allegations of retaliation or victimisation seriously. The concern will be considered promptly and appropriate action will be taken where necessary. This may include action under the school's disciplinary, grievance, safeguarding or other relevant procedures.





Raising a concern about detrimental treatment will not affect the consideration of the original whistleblowing disclosure and will not prevent the individual from seeking independent advice or exercising any statutory rights available to them.

An individual who is concerned about their legal rights or believes that they have suffered detriment because of whistleblowing may wish to seek independent advice from Acas, Protect, their trade union or an independent legal adviser.

5. Concerns that are not substantiated or are knowingly false

Storybrook encourages individuals to raise concerns where they have reasonable grounds for doing so. An individual is not expected to prove that wrongdoing has occurred before raising a concern, and the fact that a concern is subsequently found to be mistaken, unfounded or unsubstantiated does not mean that it was raised maliciously.

No individual will be subjected to disciplinary action, detriment or other adverse treatment simply because a concern they raised is not substantiated following consideration or investigation.

A distinction will be maintained between a concern that is mistaken, unfounded or unsubstantiated and a concern that is deliberately and knowingly false or raised maliciously.

Where there is clear evidence that an employee has deliberately and knowingly provided false information or has raised a concern maliciously with the intention of causing harm, this may constitute misconduct and may be considered under Storybrook's disciplinary procedures.

The fact that an individual has raised a concern that is critical of another person, the school, its leadership, governance or the Proprietor will not in itself be regarded as evidence of malice.

Where the concern relates to safeguarding or the conduct of an adult working in or on behalf of Storybrook, the terminology and outcome categories within Keeping Children Safe in Education and Storybrook's Managing Allegations Policy will be applied as appropriate. An allegation being determined to be unfounded or unsubstantiated must not, by itself, result in adverse action against the person who raised it.

Storybrook will ensure that this provision is not used to discourage individuals from speaking up or to penalise an individual for raising a genuine concern.

6. Procedure

Raising a concern

Individuals should raise concerns as soon as reasonably possible where they believe that wrongdoing, malpractice, unsafe practice or another matter within the scope of this policy has occurred, is occurring or is likely to occur.

A person raising a concern is not expected to investigate the matter, obtain proof or determine whether the concern meets the legal definition of a protected disclosure before speaking up. They should provide the information available to them and explain the basis of their concern.





Where possible, concerns should include:

- the nature of the concern
- relevant dates, events or circumstances
- the people or areas involved
- any immediate risks identified
- any action already taken or concerns previously raised
- any relevant information or documents available to the person raising the concern

A lack of documentary evidence must not prevent a concern from being raised or considered.

No proof required

An individual raising a concern is not expected to prove that wrongdoing has occurred, conduct their own investigation or obtain evidence before speaking up.

The individual should have reasonable grounds for their concern and should provide the information that is available to them. They are not required to establish that the concern is true or that wrongdoing has definitely taken place.

Individuals must not attempt to investigate a concern themselves, question witnesses, confront a person who may be involved or take any action that could place themselves or another person at risk, compromise safeguarding arrangements or interfere with a subsequent investigation.

It is Storybrook's responsibility to consider the information provided, determine the appropriate procedure and decide whether further enquiries, investigation, safeguarding action or referral to an external body are required.

A concern will not be disregarded solely because the individual raising it cannot provide documentary evidence or other proof. Equally, the fact that a concern is subsequently found to be mistaken, unfounded or unsubstantiated does not, by itself, mean that it was raised maliciously or improperly.

Internal reporting route

A whistleblowing concern should normally be raised with the individual's line manager or the Headteacher.

An individual is not required to raise a concern with their line manager where:

- the line manager is involved in or implicated by the concern
- there is an actual or perceived conflict of interest
- the concern is particularly serious
- the individual reasonably believes that raising it through that route would not be appropriate
- the concern has previously been raised and has not been addressed appropriately

In these circumstances, the concern may be raised directly with the Headteacher.





Where a concern has been raised with a line manager, the line manager must ensure that it is escalated promptly to the Headteacher where this is necessary under this policy. The person receiving the concern must not investigate matters outside their role or remit.

Concerns involving the Headteacher

Where the concern relates to, implicates or creates an actual or perceived conflict of interest for the Headteacher, it must not be reported to or managed by the Headteacher.

The concern must instead be reported directly to the Proprietor or to the person formally designated by the Proprietor to receive and manage concerns about the Headteacher.

The Chair of Governors may receive or manage such a concern only where formally designated by the Proprietor for this purpose.

The Headteacher must not be informed of the identity of the person raising the concern or of information relating to the concern before this is considered appropriate by the person responsible for managing it, particularly where doing so could compromise safeguarding, evidence, confidentiality or the integrity of any subsequent investigation.

Concerns involving governors or the Proprietor

Where a concern relates to a governor, it should normally be raised with the Chair of Governors and the Proprietor, unless either person is implicated or there is an actual or perceived conflict of interest.

Where a concern relates to the Chair of Governors, it must be raised directly with the Proprietor or another appropriately designated person who is independent of the concern.

Where a concern relates to the Proprietor, or where the usual recipient of a concern is implicated or otherwise conflicted, the individual must not be required to report the matter to that person. An appropriate independent and non-conflicted route must be used.

No person who is the subject of a concern, directly implicated in it or otherwise subject to an actual or perceived conflict of interest may determine how the concern is handled, appoint themselves to investigate it or determine its outcome.

Where an appropriate internal route cannot reasonably be used, the individual may raise the concern through an appropriate external route as set out below.

Safeguarding concerns

Where information raised under this policy indicates a concern about the safety or welfare of a child, the school's safeguarding procedures must be followed without delay.

Where the concern relates to the conduct of an adult working in or on behalf of Storyybrook, it must be referred into the appropriate Low-Level Concerns or Managing Allegations procedure. The appropriate case manager, rather than the whistleblowing recipient or DSL by default, will determine how the concern about the adult is managed.





Where the concern relates to poor or unsafe safeguarding practice, systemic safeguarding failures, failure to act on safeguarding information, concealment of safeguarding concerns or concerns about the way safeguarding matters are being handled, the Whistleblowing Policy may continue to apply alongside any necessary safeguarding action.

Nothing in this procedure should delay immediate action required to protect a child.

External reporting and prescribed persons

Storybrook encourages individuals to raise concerns internally where it is appropriate and safe to do so, as this may enable concerns to be addressed promptly. However, nothing in this policy prevents a worker from making a disclosure to an appropriate external person or body where permitted by law.

A worker may make a disclosure to a relevant prescribed person or body. Prescribed persons are individuals and organisations designated by law to receive whistleblowing disclosures about particular types of wrongdoing within their remit.

It is important that a worker chooses a prescribed person whose remit relates to the subject matter of the concern. Statutory protection for a disclosure made to a prescribed person depends on the requirements of whistleblowing legislation being satisfied, including the worker reasonably believing that the matter falls within that person's prescribed remit and that the information disclosed and any allegations contained within it are substantially true.

The Government maintains an up-to-date list of prescribed people and bodies, together with information about the matters that may be reported to them. Individuals considering an external disclosure are encouraged to check the current list and, where appropriate, obtain independent advice before making the disclosure.

Depending on the nature of the concern, an appropriate external body may include a regulator or prescribed person responsible for matters such as education, children's interests, health and safety, data protection, equality, financial wrongdoing or other relevant regulatory matters.

Where the concern relates to the way in which child protection issues are being handled within Storybrook or another organisation, professionals may contact the national child abuse whistleblowing advice line operated by the NSPCC.

The Local Authority Designated Officer (LADO) may also be involved where information relates to an allegation or concern about an adult working with children and the harm threshold may be met, or where advice is required about the appropriate safeguarding response. The LADO is part of the safeguarding allegations process and should not be presented as a general external whistleblowing route.

The Department for Education also receives whistleblowing disclosures within the scope of its published arrangements and may refer matters to another organisation, such as Ofsted or the police, where appropriate. Individuals should check the Department for Education's current guidance to establish whether it is an appropriate route for the particular concern.





Nothing within this policy prevents an individual from reporting suspected criminal activity to the police, contacting emergency services where there is an immediate risk of harm, or making a safeguarding referral to the appropriate statutory agency where necessary.

Workers considering an external disclosure may wish to obtain independent advice from their trade union, Acas, Protect or an independent legal adviser. Whether a particular disclosure attracts statutory whistleblowing protection will depend upon the circumstances, including the nature of the disclosure and the person or body to whom it is made.

External information and advice

Current information about external whistleblowing routes is available from:

- GOV.UK - Whistleblowing: list of prescribed people and bodies
- Department for Education - whistleblowing guidance
- NSPCC - national child abuse whistleblowing advice line for professionals concerned about how child protection issues are being handled
- Acas - independent workplace advice
- Protect - independent whistleblowing advice
- an individual's trade union or professional association

Contact details and reporting arrangements may change. Individuals should use the current information published by the relevant organisation.

Confidential and anonymous disclosures

Storyybrook encourages individuals to raise concerns openly where they feel able to do so, as this can make it easier to clarify information, investigate the concern fully, provide appropriate support and give feedback. However, Storyybrook recognises that there may be circumstances in which an individual wishes to raise a concern confidentially or anonymously.

An open disclosure is one in which the individual identifies themselves and does not request that their identity is withheld.

A confidential disclosure is one in which the individual identifies themselves to the person receiving the concern but asks for their identity to be protected. Storyybrook will take reasonable steps to maintain the confidentiality of an individual's identity where this is requested. Information will be shared only with those who need to know in order to assess, manage or investigate the concern.

Absolute confidentiality cannot be guaranteed. There may be circumstances in which information must be shared in order to safeguard a child or another person, comply with a legal obligation, ensure procedural fairness or enable an appropriate external agency to carry out its functions. It may also be possible for others to infer the identity of the person raising the concern from the nature or circumstances of the information provided. Where it becomes necessary to disclose an individual's identity, Storyybrook will discuss this with them in advance where reasonably practicable and lawful.

An anonymous disclosure is one in which the individual does not provide their identity. Storyybrook will consider anonymous concerns and will not disregard a concern solely because the identity of the person raising it is unknown.





Anonymous concerns will be considered according to the information available, including the seriousness of the matters raised, any immediate safeguarding or other risks, the credibility and specificity of the information provided and the extent to which the concern can reasonably be investigated.

Individuals should be aware that raising a concern anonymously may make it more difficult for Storyybrook to seek clarification or additional information, investigate the concern fully, provide support to the person raising the concern or give feedback about how the matter has been handled. This will not, however, prevent Storyybrook from taking appropriate action where sufficient information is available.

Where an anonymous concern cannot be progressed because there is insufficient information, a proportionate record of the concern and the action considered will be retained in accordance with the school's record-keeping arrangements. This may enable Storyybrook to identify patterns or connections should further concerns subsequently arise.

Whether a concern is raised openly, confidentially or anonymously, safeguarding information will be acted upon in accordance with Storyybrook's safeguarding procedures. Confidentiality or anonymity must not prevent or delay action necessary to protect a child or another person from harm.

7. Records, confidentiality, outcomes and organisational learning

Record keeping

Storyybrook will maintain an appropriate written record of whistleblowing concerns raised under this policy and the action taken in response.

Records should, where applicable, include:

- the date the concern was received
- the nature of the concern and information provided
- whether the concern was raised openly, confidentially or anonymously
- the person responsible for managing the concern
- any actual or perceived conflicts of interest identified and how these were managed
- immediate safeguarding, safety or other protective action taken
- referrals to other procedures or external agencies
- enquiries or investigations undertaken
- key decisions and the reasons for them
- the outcome of the matter
- feedback provided to the person who raised the concern
- any action taken to prevent retaliation or victimisation
- identified learning, improvements or follow-up action

Records must be factual, proportionate and sufficiently clear to demonstrate how the concern was considered and why decisions were made.

Where a whistleblowing concern also engages another procedure, including safeguarding, low-level concerns, managing allegations, disciplinary or grievance procedures, records will be maintained in accordance with the requirements applicable to those procedures. Unnecessary duplication of sensitive information will be avoided.





Confidentiality and information sharing

Whistleblowing records will be treated as confidential and will be accessible only to those who require access for a legitimate purpose.

Information relating to a concern will be shared on a need-to-know basis and in accordance with applicable data protection legislation, safeguarding requirements and the need to ensure a fair and effective process.

The identity of a person who raises a concern confidentially will be protected as far as reasonably possible. However, confidentiality cannot be guaranteed where disclosure is necessary to safeguard a child or another person, comply with a legal obligation, enable an appropriate external agency to carry out its functions or ensure procedural fairness.

Information about a whistleblowing concern must not be shared informally, discussed unnecessarily or disclosed to the person who is the subject of the concern before this is appropriate. Particular care will be taken where premature disclosure could place a child or another person at risk, compromise evidence, expose the person raising the concern to retaliation or prejudice a subsequent investigation.

Personal information will be processed in accordance with the school's data protection arrangements and applicable data protection legislation, including the UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025.

Outcomes and feedback

Following appropriate consideration, Storyybrook will record the outcome of the concern and any action required.

Outcomes may include:

- no further action, with the reasons recorded
- action to address an identified risk or unsafe practice
- referral to another school procedure
- management or disciplinary action
- safeguarding action
- referral to the LADO or another safeguarding agency where appropriate
- referral to a regulator, prescribed person, police or other external body
- changes to policy, procedure, training, supervision or working practices
- further monitoring or review

Where reasonably practicable, the person who raised the concern will be informed when consideration of the matter has concluded and provided with appropriate feedback.

Storyybrook may be unable to provide detailed information about action taken in relation to another individual because of confidentiality, safeguarding, employment or data protection requirements. A restriction on the information that can be provided must not be interpreted as meaning that the concern has not been considered or acted upon.





Where the person raising the concern reasonably believes that the matter has not been addressed appropriately or that the wrongdoing is continuing, they may use an appropriate escalation or external reporting route set out in this policy.

Organisational learning

Whistleblowing will not be treated solely as a mechanism for responding to individual incidents. Storyybrook will consider whether concerns identify wider lessons for safeguarding, leadership, governance, culture, systems or organisational practice.

Following a whistleblowing concern, consideration will be given to whether:

- policies or procedures require amendment
- safeguarding arrangements require strengthening
- staff training, induction or supervision should be improved
- roles, responsibilities or reporting arrangements require clarification
- communication or information-sharing arrangements require improvement
- similar concerns have previously been raised
- there are patterns or themes that indicate a wider organisational issue
- risk assessments or other control measures require review
- governance oversight or assurance arrangements require strengthening
- further monitoring is required to ensure that agreed actions have been implemented and are effective

Learning will be translated into proportionate action and followed through to completion. Where appropriate, improvements arising from a concern will be incorporated into school development, safeguarding, training, risk-management or governance arrangements.

The identity of the person raising the concern will not be disclosed as part of organisational learning or governance reporting unless this is necessary, lawful and proportionate.

Governance and Proprietor oversight

The Proprietor has strategic oversight of the effectiveness of Storyybrook's whistleblowing arrangements and will seek assurance that concerns can be raised safely, are handled appropriately and result in organisational learning where required.

The Governing Body will support appropriate oversight and challenge within the school's governance framework. Governance reporting will normally be anonymised and sufficiently high level to protect confidentiality while enabling governors and the Proprietor to identify themes, patterns, risks and areas requiring further assurance.

Oversight should consider, as appropriate:

- the number and broad nature of concerns raised
- whether appropriate reporting and escalation routes were followed
- whether concerns were handled within reasonable timescales
- whether safeguarding or external referrals were made where required
- whether conflicts of interest were identified and managed appropriately
- whether any concerns about retaliation or victimisation arose
- recurring themes or patterns





- organisational learning and actions identified
- whether agreed actions have been completed and have had the intended effect
- whether staff understand and have confidence in the school's whistleblowing arrangements

Governance oversight must not compromise the confidentiality of individual cases or result in governors becoming involved in operational case management unless they have a formally designated role within the relevant procedure.

Where a concern relates to the Headteacher, a governor, the Chair of Governors or the Proprietor, oversight arrangements will be adapted as necessary to ensure that no person who is implicated in or conflicted by the concern receives inappropriate information or exercises oversight of their own case.

Significant concerns, recurring themes and evidence of systemic weakness will be escalated appropriately within the school's governance arrangements and, where required, to relevant external agencies or regulatory bodies.

8. Responsibilities

All individuals working in or on behalf of Storyybrook have a role in supporting an open, transparent and safe culture in which concerns can be raised and responded to appropriately.

All employees, workers, agency staff, contractors, volunteers and other adults working in or on behalf of Storyybrook are responsible for:

- raising concerns promptly where they have reasonable grounds for doing so
- providing the information available to them as clearly and accurately as possible
- not investigating concerns themselves, attempting to obtain proof, questioning witnesses or confronting individuals who may be involved
- following the appropriate reporting route set out within this policy
- maintaining appropriate confidentiality and not discussing concerns unnecessarily
- cooperating reasonably with any enquiries or investigation where required
- reporting any retaliation, victimisation or detrimental treatment arising from a concern

Individuals who receive or manage a whistleblowing concern are responsible for:

- listening to the concern and taking it seriously
- ensuring that immediate safeguarding, health and safety or other risks are addressed without delay
- ensuring that the concern is directed to the appropriate person and considered under the correct procedure
- recognising where a matter should instead, or additionally, be managed under the Safeguarding and Child Protection Policy, Low-Level Concerns Policy, Managing Allegations Policy, grievance procedure, Complaints Policy or another relevant procedure
- identifying and appropriately managing any actual or perceived conflict of interest
- not investigating matters outside their role or remit
- maintaining clear, factual and proportionate records of decisions and actions





- protecting confidentiality as far as reasonably possible and sharing information only where there is a legitimate need to know
- taking reasonable steps to protect the person raising the concern from retaliation, victimisation or detrimental treatment
- seeking appropriate safeguarding, professional, regulatory or legal advice where required
- providing appropriate feedback to the person raising the concern where reasonably practicable
- identifying and acting upon any wider organisational learning arising from the concern

The Headteacher is responsible for promoting an open speak-up culture within Storyybrook and ensuring that staff understand the school's whistleblowing arrangements and know how concerns can be raised. The Headteacher will ensure that concerns received through the appropriate reporting route are handled promptly, fairly and in accordance with this policy.

The Headteacher's responsibilities under this policy do not apply where the Headteacher is the subject of the concern, is directly implicated in it or has an actual or perceived conflict of interest. In these circumstances, the alternative reporting and case-management arrangements set out in section 6 must be followed.

The Proprietor is responsible for maintaining strategic oversight of the effectiveness of Storyybrook's whistleblowing arrangements and ensuring that appropriate arrangements exist for concerns involving the Headteacher or other circumstances in which the usual internal reporting route cannot safely or appropriately be used.

The Governing Body will provide appropriate challenge and assurance within Storyybrook's governance framework, including consideration of anonymised themes, patterns, organisational learning and the effectiveness of the school's speak-up culture. Governors will not become involved in operational case management unless they have been formally designated to undertake a specific role within the relevant procedure.

No person who is the subject of a concern, directly implicated in it or otherwise subject to an actual or perceived conflict of interest may determine how that concern is handled, appoint themselves to investigate it, determine its outcome or exercise inappropriate oversight of the matter.

9. Review

This policy will be reviewed at least annually and sooner where required by changes to legislation, statutory safeguarding guidance, whistleblowing guidance, local safeguarding arrangements, regulatory expectations or learning arising from concerns raised within Storyybrook.

The review will consider not only whether the policy remains legally and procedurally current, but whether Storyybrook's whistleblowing arrangements are understood, accessible, trusted and effective in practice.

Learning from whistleblowing concerns, safeguarding incidents, complaints, low-level concerns, allegations, staff feedback and governance assurance will be considered where relevant to the review.





The Proprietor will retain oversight of the effectiveness of the school's whistleblowing arrangements, with appropriate challenge and assurance provided through the school's governance framework.

