



Ashton St. Peter's Church of England Voluntary Aided Primary School

Confidential Reporting Policy (Whistleblowing Policy)

Ratified in April 2026

Update in April 2027

The Governing Body of Ashton St. Peter's Church of England VA Primary School adopted this Confidential Reporting Policy written and updated by the Central Bedfordshire Local Authority.

Review Procedures:

- Annually
- If school wishes to review the Policy
- If amendments are required by the Council

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Ratified:

Headteacher

Date: April 2026

CONFIDENTIAL REPORTING

(Also known as 'Whistleblowing')

1. Introduction

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

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

The Public Interest Disclosure Act 1998 encourages individuals to raise concerns about malpractice in the workplace. This policy makes clear that employees can raise serious concerns without fear of victimisation, discrimination or disadvantage.

This code acknowledges amendments introduced by the Enterprise and Regulatory Reform Act 2013 and incorporates strengthened whistleblowing protections introduced by the Employment Rights Act 2025, including the explicit recognition of sexual harassment as a protected disclosure.

This policy applies to all employees, governors, contractors, agency staff, volunteers, suppliers and others working with or on behalf of the school.

2. Aims and Scope of this Code

This code aims to:

- encourage staff to feel confident in raising serious concerns
- provide clear routes for concerns to be raised
- ensure a response is received and feedback given where appropriate
- reassure staff they will be treated with respect and protected from reprisals or victimisation where they reasonably believe a disclosure is made in the public interest

A disclosure is generally considered to be in the public interest when the suspected wrongdoing could affect others beyond the individual raising the concern, for example colleagues, pupils, families, service users or the wider public.

Any behaviour that seeks to disadvantage, intimidate or retaliate against someone for raising concerns will not be tolerated and may result in disciplinary action.

This code covers concerns that fall outside other procedures such as grievance, bullying, harassment or complaints procedures.

3. Qualifying Disclosures

A qualifying disclosure is one made in the public interest where there is a reasonable belief that one or more of the following is happening, has happened, or is likely to happen:

- a criminal offence or breach of law
- fraud, corruption, bribery or misuse of public funds
- operating without required legal permissions or insurance
- miscarriages of justice
- health and safety risks
- damage to the environment
- sexual or physical abuse of children, clients or vulnerable adults
- sexual harassment

- other unethical conduct
- deliberate concealment of any of the above

This may include conduct that:

- makes you feel uncomfortable against known standards
- is against school or Council policies
- falls below expected professional standards
- amounts to improper conduct

4. Prescribed Persons and External Bodies

Staff are normally expected to raise concerns internally first. However, disclosures may also be made to prescribed persons or bodies where appropriate.

The Government maintains an updated list of prescribed persons and bodies for whistleblowing purposes.

Relevant bodies may include:

- Ofsted
- Care Quality Commission (CQC)
- Information Commissioner
- Environment Agency
- the Council's external auditor
- the police
- NSPCC Whistleblowing Helpline

Safeguarding concerns involving children should always also follow the school's safeguarding and child protection procedures.

5. Safeguards

Harassment or Victimisation

The school and Council will not tolerate bullying, harassment or victimisation of anyone raising a genuine concern in the public interest.

Victimisation of a worker for raising a qualifying disclosure will be treated as a disciplinary offence.

Dismissal linked to a protected disclosure is automatically unfair.

Workers have the right not to be subjected to detriment because they have made a protected disclosure.

Any investigation into allegations of malpractice will not influence, or be influenced by, existing disciplinary, sickness, capability or redundancy procedures.

6. Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you wish.

However, the investigation process may reveal the source of the information and a statement from the whistleblower may be required as part of the evidence.

Where legal proceedings follow, or where serious criminal matters require police involvement, identities may need to be disclosed. You will be informed beforehand wherever possible.

7. Anonymous Allegations

Anonymous concerns are harder to investigate but will be considered depending on:

- seriousness of the issue
- credibility of the allegation
- likelihood of confirmation from other evidence

Where possible, staff are encouraged to provide their name so confidentiality protections and feedback can be properly managed.

8. False or Unproven Allegations

If a concern is raised honestly and in the public interest but is not confirmed after investigation, no action will be taken against the whistleblower.

If an allegation is made maliciously or for personal gain, disciplinary action may be taken.

9. How to Raise a Concern

In most cases concerns should first be raised with:

- your line manager
- the Headteacher
- the Chair of Governors

Where management may be involved, concerns may be raised with:

- Monitoring Officer
- Director of Resources and Organisational Change
- Head of Internal Audit and Risk
- Chief Executive

If the concern relates to these officers, concerns should be raised with the:

- Service Director – Human Resources & Organisational Development

Concerns may be raised verbally or in writing and should include:

- background and history of the concern
- relevant dates
- why you are concerned
- as much supporting information as possible

All concerns will be registered with the Monitoring Officer.

10. How the Council Will Respond

The Council will review and respond to concerns raised.

This may involve:

- management investigation
- internal audit investigation
- disciplinary process
- referral to the police
- referral to the external auditor
- independent inquiry

Within ten working days, the Monitoring Officer will normally write to:

- acknowledge receipt
- explain how the matter will be handled
- give an estimate of timescales
- confirm whether initial enquiries have been made
- explain whether further investigation will take place

- provide staff support information

Subject to legal constraints, outcomes will be shared where appropriate.

11. Responsible Officer

The Monitoring Officer has overall responsibility for maintaining this code, recording concerns and outcomes confidentially, and ensuring proper and timely progress.

12. Taking the Matter Further

If you are dissatisfied with how your concern has been handled, you may take the matter outside the Council.

Before doing so, independent advice can be obtained from Protect (formerly Public Concern at Work).

Protect Advice Line details can be accessed via:

<https://protect-advice.org.uk/contact-protect-advice-line>

Possible external contacts include:

- external auditor
- trade union representative
- Citizens Advice Bureau
- relevant professional bodies
- voluntary organisations
- police

Confidential information must not be disclosed inappropriately.

Further Information

Robert Ling – Director of Resources and Organisational Change

TEL: 0300 300 6147

Clint Horne – Head of Internal Audit and Risk

TEL: 0300 300 4758

CBC Fraud Hotline

TEL: 0300 300 8182

EMAIL: tellusaboutfraud@centralbedfordshire.gov.uk

Monitoring Officer

EMAIL: monitoringofficer@centralbedfordshire.gov.uk

Marcel Coiffait – Chief Executive

TEL: 0300 300 5637

Vikki Chapman – Service Director – Human Resources & Organisational Development

TEL: 0300 300 6213

NSPCC National Whistleblowing Helpline

TEL: 0808 800 5000

EMAIL: help@nspcc.org.uk