



ST PAUL'S
GIRLS' SCHOOL

Whistleblowing Policy

Published September 2026

Document owner	Bursar
Approved by	Finance and Estates Committee
Date published	September 2026 – pending final approval
Review cycle	Biennial
Next review date	Autumn 2026
Availability	School website; staff portal

Legal framework

- Employment Rights Act 1996 (Part IVA)
- Public Interest Disclosure Act 1998 (PIDA)
- Enterprise and Regulatory Reform Act 2013 (ERRA)
- Keeping Children Safe in Education (2026)
- Education Act 2002 (Section 175)
- Employment Rights Act (2025)

Availability of this policy

A copy of this policy may be downloaded from our [website](#) or is available on request from the school office, St Paul's Girls' School, Brook Green, London, W6 7BS (tel: 0207 603 2288). This policy can be made available in large print or other accessible format if required.

Table of Contents

Legal framework	1
What is whistleblowing.....	3
Scope of this policy	3
Safeguarding	3
School's Commitment	4
Individual Safety	4
Individual Confidence.....	4
Anonymous Concerns	4
How to raise a concern.....	4
Procedures for school staff and volunteers	4
Procedures for workers who are not staff or volunteers	5
How the school will respond.....	5
Raising a concern outside the school	5

What is whistleblowing

1.1 Whistleblowing is legally defined as a worker reporting specific types of workplace wrongdoing that are in the public interest. To qualify for legal protection, the worker must have a reasonable belief that the disclosure reveals an issue such as a crime, a legal breach, or a health hazard, and is reported through the channels prescribed in this policy.

1.2 Whistleblowing can be used to report instances where, despite flagging issues with senior staff, school policies have been deemed to have failed.

Scope of this policy

2.1 There are existing procedures in place to enable employees to lodge a grievance relating to their employment. This policy is not intended to cover concerns that can be progressed under existing HR or other school procedures, or by raising a concern informally with a suitable member of the school's management, but for the expression of serious concerns where they are in the interests of the school, its assets, hirers or when staff, students or visitors are at risk. The procedure for staff and volunteers to raise concerns about the school's fundraising practice is set out in the fundraising policy.

2.2 A protected disclosure may be about a wrongdoing that a worker reasonably believes has happened, is happening, or is likely to happen; that is in the public interest and is a disclosure of information not just a general complaint or personal grievance. It must fall into one of these specific categories as defined in the Employment Rights Act 2025 and in line with ACAS whistleblowing guidance:

- Criminal offence e.g. financial fraud, theft of school assets, or corporate bribery
- Breach of legal obligations e.g. failure to provide mandatory SEND provisions or breaching GDPR data regulations
- Miscarriages of justice e.g. falsifying student exam grades by rigging internal disciplinary processes
- Health and safety danger e.g. ignoring structural building damage e.g. faulty fire doors or exposed asbestos
- Environmental damage e.g. illegal disposal of toxic classroom chemicals or school site waste
- Sexual harassment e.g. severe workplace sexual misconduct or harassment by staff
- Deliberate concealment e.g. actively hiding or destroying evidence regarding any of the above infractions.

2.3 The school's Complaints policy outlines the procedures for parents to raise a concern or complaint about matters relating to their child's day to day life at the school. The school's Standards for Financial Management and Fraud, Anti-Corruption and Bribery policy provide further information about the expected standards of behaviour for financial matters.

Safeguarding

31 If a worker has a concern that a child is at risk of harm, they should speak to the school's Designated Safeguarding Lead (DSL) or one of the Deputy DSLs. Full details on reporting concerns are outlined in the Safeguarding (child protection) policy. All staff are required to report to the High Mistress (or to the Deputy Head (Safeguarding and Inclusion) or to the Head of HR if the matter is urgent and the High Mistress is not available) any concern about school procedures or the behaviour of colleagues which are likely to put students at risk of abuse or other serious harm.

3.2 Where a safeguarding matter has been reported in accordance with the Safeguarding policy and there is a concern that it has not been handled appropriately, resulting in continued risk to a child, the matter should be reported under the Whistleblowing policy.

School's Commitment

Individual Safety

4.1 For a report to legally count as a 'protected disclosure', it must meet the following criteria outlined in 1.1. Individuals who meet these criteria are protected from being dismissed or suffering a detriment (such as being demoted or harassed) for making the disclosure. Provided they are acting in good faith, it does not matter if they are mistaken. This assurance will not be extended to someone who maliciously or vexatiously raises a matter they know to be untrue. Staff who knowingly make false accusations can expect to face appropriate disciplinary action. Staff should follow appropriate HR procedures if the matter is a private grievance or if it is in relation to an assertion of a breach of employment contract.

Individual Confidence

4.2 The school will not tolerate the harassment or victimisation of anyone raising a genuine concern, or the harassment or victimisation of colleagues in receipt of vexatious complaints. However, the school recognises that individuals may nonetheless want to raise a concern in confidence under this policy. If an individual asks the school to protect their identity by keeping their confidence, the school will not disclose it without their consent unless required to do so by the Police or other legal processes.

Anonymous Concerns

4.3 This policy encourages individuals to put their name to their allegation. Concerns expressed anonymously are much less powerful, but they will nonetheless be investigated, where this is possible, and followed up at the discretion of the school. In exercising this discretion, factors that may be taken into account include:

- the seriousness of the issues raised
- the sufficiency and detail of information provided
- the credibility of the concern
- the likelihood of confirming the allegations from attributable sources
- the possibility of the concern being vexatious or vindictive.

How to raise a concern

Procedures for school staff and volunteers

5.1 In the first instance, an individual may feel it appropriate to raise their concerns with their immediate line manager or a member of the Senior Leadership Team (SLT). This choice depends on the seriousness and/or sensitivity of the issues involved, and who is thought to be involved in the malpractice. If an individual feels unable to approach an SLT member, then the High Mistress should be contacted. If they feel unable to approach the High Mistress, then the Chair of Governors should be contacted. If the matter is of a safeguarding nature and/or relates to a member of staff, it must be reported to via CPOMS StaffSafe in accordance with the school's safeguarding procedures. Where a concern suggests that a child (or member of staff) may be at immediate risk of harm, the matter should be brought directly to the attention of the High Mistress without delay, or in her absence to the DSL.

5.2 Once reported the line manager or person receiving the concern, will confirm that it falls under this policy and ask the individual to make a written report.

5.3 If all internal procedures have been exhausted, a member of staff has the right of access to an external person/body. Please see section 7 about raising a concern outside school.

5.4 It will very rarely, if ever, be appropriate for individuals to alert the media.

5.5 The earlier the concern is raised, the easier it will be to take action. Although the individual raising the concern is not expected to prove the truth of the allegation, they will need to demonstrate to the person contacted that there are sufficient evidential grounds for their concern to be investigated further.

5.6 A record of any concerns raised under this procedure will be held by the Clerk to the Governors and therefore anyone made aware of a whistleblowing concern should notify the Bursar (who is the Clerk) on clerk@spgs.org unless there is a good reason not to notify the Bursar in which case the Chair of Governors should be contacted directly. The Chair of Governors will be notified of any concerns that the school is made aware of and that are raised under this procedure.

Procedures for workers who are not staff or volunteers

5.7 The school would normally expect third party providers to raise concerns with their immediate contact at the school. If the concern involves that member of staff, the matter should be raised with their line manager. If this is not appropriate, the High Mistress should be contacted. If the matter may involve the High Mistress, the Chair of Governors, Mr Simon Wathen, should be contacted by email clerk@spgs.org.

5.8 If for any reason it is felt that these reporting procedures are not adequate for the type of concern, the school's auditors should be contacted (details above).

How the school will respond

6.1 Once an individual has raised a concern, the school will examine it to assess initially what action should be taken. The action taken will depend on the nature of the concern, but could be:

- an internal investigation
- a referral to external auditors
- a referral to the Police
- an independent inquiry.

6.2 Within 10 working school days of a concern being received, the school will write to the individual. If the concern is raised during the school holidays, then the school will write to the individual as soon as practical:

- acknowledging that the concern has been received
- indicating how the matter will be dealt with, and by whom
- giving an estimate of the time it will take to provide a detailed and final report on the concerns raised
- informing the individual if any initial enquiries have been made
- telling the individual whether further investigations will take place and if not, why not
- provide details of staff support mechanisms.

6.3 Staff should note that in some cases (e.g. a safeguarding matter) it may not be possible to provide a report on the outcome due to reasons of confidentiality.

Raising a concern outside the school

7.1 Although the school would hope that this policy gives individuals the reassurance to report any concerns through the suggested channels, the school recognises that there may be circumstances where individuals feel unable to follow this process and want external advice and support or to raise the matter externally.

7.2 Support is available from:

- Protect (www.protect-advice.org.uk). This is an independent charity which offers legal advice and assistance to employees with whistleblowing concerns

- Professional Associations or Trade Unions. Most Unions have issued their own guidance on whistleblowing
- The Charity Commission website (The Charity Commission - GOV.UK (www.gov.uk)) has information on how to report serious incidents or concerns about the wrongdoing of a charity including improper administration and/or use of funds given or held for charitable purposes How to report a serious incident in your charity - GOV.UK (www.gov.uk). The Commission has a designated email address for whistleblowing – whistleblowing@charitycommission.gov.uk
- *The Local Authority Designated Officer (LADO) for safeguarding matters – LADO@lbhf.gov.uk or 020 8753 5125*
- The NSPCC has a whistleblowing advice line for matters relating to safeguarding and child protection; staff are able to bypass school management and go straight to the NSPCC if they feel their internal concerns are being ignored – 0800 028 0285
- Concerns on fundraising practice can be escalated to the Fundraising Regulator ([Make a complaint | Fundraising Regulator](#)) in the event that internal consideration is not possible
- Further information about whistleblowing is available at www.gov.uk/whistleblowing. Details of other agencies and individuals to whom whistleblowing matters can be reported are available on the government site.

The school strictly prohibits any retaliation or detriment against a worker for making a protected disclosure. If a worker believes they have suffered a detriment and wishes to bring an Employment Tribunal claim, the statutory time limit is six months less one day from the date the specific act of detriment occurred (or the date of the final act if it is part of an ongoing series of events).