THAMES FEDERATION
HIGH EXPECTATIONS | ENRICHMENT | EXCELLENCE

WHISTLE BLOWING POLICY

Reviewed by: HR/EHT
Approved by Curriculum Committee | 30th April 2026
Approved by: FGB | 9th July 2026
Date of Next Review: April 2028
Adopted policy Hammersmith & Fulham L.A.|March 2026

Schools have policies and procedures in place that deal with behaviour at work: these include the handling of matters concerning safeguarding, misconduct/discipline, grievance, bullying, discrimination and harassment and the recruitment and selection process.

However, there may be an occasion where a member of staff has a matter of concern about activities at the school that fall outside these procedures and which needs to be handled in a different way. Examples might be where a member of staff has information about activities at the school that indicate:

- Malpractice or ill treatment of a pupil or peer by a member of staff or governor, or a criminal act has been or is likely to be committed against that person.
- Suspected fraud against the School/Council.
- Disregard for legislation, particularly in relation to safeguarding or health and safety at work issues.
- Damage to the environment.
- Showing undue favour over a contractual matter or a job applicant
- Unauthorised use of public funds
- Breaches of financial and procurement procedures
- Cyber security incidents or breaches that put the school at risk
- Data protection breaches or misuse of personal information
- Online safety concerns that fall outside normal safeguarding procedures
- Serious breaches of the school's code of conduct or professional standards

This whistle blowing procedure takes into account the requirements of the law, specifically the Public Interest Disclosure Act. This law states that an employee is entitled not to be subjected to any detriment by virtue of having made a protected disclosure.

1. Introduction

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

The Local Authority and the Governing Body are committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we would hope that employees at the school who have a genuine serious concern about any aspect of the school's work would come forward and voice those concerns.

This policy makes it clear that you can do so without fear of victimisation, subsequent discrimination or disadvantage. This policy is intended to encourage and enable employees to raise serious concerns within the school to enable issues to be addressed rather than overlooking a problem or 'blowing the whistle' outside.

This policy applies to all employees, supply teachers, temporary agency staff, peripatetic staff, contractors, volunteers, and governors working across The Thames Federation.

2. Aims and scope of this policy

This policy aims to:

- encourage you to feel confident in raising serious concerns and to question and act upon concerns about inappropriate practice or behaviour
- provide avenues for you to raise those concerns and receive feedback on any action taken
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made any disclosure in good faith.

There are existing procedures in place to enable you to lodge a grievance relating to your own employment. This whistle blowing policy is intended to cover major concerns that fall outside the scope of other procedures.

Any serious concerns that you have about an aspect of service provision or the conduct of employees or governors or others acting on behalf of the school can be reported under this policy. This may be about something that:

- Makes you feel uncomfortable in terms of known standards, your experience or the standards you believe the school subscribes to;
- Is against the school's standing orders, financial regulations, contracts code, or other policies;
- Falls below established standards of practice;
- Amounts to improper conduct
- Systemic or gross breaches of the Mobile Phone Policy, such as unauthorised possession or covert use of personal devices, personal smartwatches, or personal recording equipment in the presence of children or within EYFS care settings.
- Creation, capture, storage, or distribution of photographs or recordings of pupils on personal devices.
- Inappropriate online conduct, circumvention of school IT filtering and monitoring systems, or the creation/sharing of AI-generated imagery (deepfakes) and sexually explicit materials.

3. Safeguards - Harassment or victimisation

The Governing body is committed to good practice and high standards and wants to be supportive of employees.

The Governing body recognise that the decision to report a concern can be a difficult one to make. If what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer and those for whom you are providing a service.

The Governing body will not tolerate any harassment or victimisation (including sexual harassment and informal pressures) and will take appropriate action to protect you when you raise a concern in good faith.

3.1 Whistleblowing and Child Protection

Matters concerning individual child welfare, low-level concerns, and allegations against staff must ordinarily be managed under the Safeguarding & Child Protection Policy. However, staff should use this Whistleblowing Policy when:

- There are concerns regarding systemic failures, culture, or poor practice in safeguarding pupils.
- Safeguarding procedures or low-level concern logs are repeatedly ignored, covered up, or not acted upon.
- A member of staff believes they cannot safely raise a child protection issue through normal internal hierarchies, or that school leaders are obstructing statutory reporting.

Where any member of staff feels a barrier to reporting internally, they must escalate externally without delay.

4. Confidentiality

All concerns will be treated in confidence and your identity, if you so wish, will not be revealed without your consent. However, circumstances may dictate that for a successful outcome you may need to come forward as a witness and the person leading the investigation into the concerns raised will discuss this with you at the appropriate time.

5. Anonymous Allegations

The school recognises that you may want to raise a concern in confidence under this policy. If you ask that your identity is protected, it will not be disclosed without your consent. If the concern cannot be resolved without revealing your identity (for instance because your evidence is needed in court) this will be discussed with you.

Investigations into anonymous allegations are limited by the sufficiency of the information provided. Some discretion will need to be applied when considering anonymous allegations to determine the likelihood of a successful outcome from the information provided.

6. Untrue allegations

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If however, you make an allegation which can be shown to have been made frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

7. How to raise a concern

As a first step, you should normally raise concerns with your immediate manager, the Head of School or Executive Head Teacher. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that school management or governors are involved, you should approach the Chair of Governors. As the responsible officer, the Chair of Governors will be informed of each concern that is raised under the procedure.

If concerns involve the Executive Head Teacher, or if there is a conflict of interest, the concern should be reported to the Co-Chairs of Governors (Jolie Collett & Louise Jones) or the Safeguarding Lead Governor (Erin Neil) at: governors@thamesfederation.lbhf.co.uk.

If the Chair of Governors is suspected of malpractice, the Director of Education in Children's Services at Hammersmith and Fulham Council should be approached. If the matter is definitely related to fraud or corruption against the school/Council you should immediately contact Hammersmith and Fulham

Council's Head of Audit, Fraud and Risk. The contact details are: David.Hughes@rbkc.gov.uk 020 7361 2389

The Head of Audit operates a secure confidential hotline for employees wishing to raise issues covered in this policy in confidence or anonymously, messages can be left at any time. Hotline: 0800 783 2406

The earlier you express the concern, the easier it is to take action. Although you are not expected to prove the truth of an allegation, you will need to demonstrate to the person contacted that there are sufficient grounds for your concern.

Concerns may be raised verbally or in writing. Staff who wish to make a written report are invited to use the following format:

- the background and history of the concern (giving relevant dates);
- the reason you are particularly concerned about the situation.

You may obtain advice/guidance on how to pursue matters of concern from your trade union.

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns. You may invite your trade union, professional association representative or a friend to be present during any meetings or interviews in connection with the concerns you have raised.

This policy covers concerns relating to:

- Cyber security incidents or vulnerabilities
- Data protection breaches or inappropriate handling of personal data
- Misuse of school IT systems or digital resources
- Online safety matters that don't fall within normal safeguarding procedures

Such concerns should be raised using the same procedures outlined in this policy.

8. How your concerns will be dealt with

Depending on the nature of the concern you will receive a response from the Head of Internal Audit / Director of Education at Hammersmith and Fulham Council or from the Chair of Governors.

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle is the public interest. Concerns or allegations which fall within the scope of specific procedures should normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

Within ten working days of a concern being raised, you will receive a response:

- Acknowledging that the concern has been received
- Indicating how the matter will be dealt with
- Giving an estimate of how long it will take to provide a final response
- Telling you whether any initial enquiries have been made
- Supplying you with information on staff support mechanisms, and
- Telling you whether further investigations will take place and if not, why not.

The amount of contact between the individuals considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from you.

Where any meeting is arranged, off-site if you so wish, you can be accompanied by a union or professional association representative or a friend.

The governing body will take steps to minimise any difficulties that you may experience as a result of raising a concern. You should also be informed how to seek confidential personal support via the school's Employee Assistance Provider (EAP), HR Connect Staff Care Services.

If you are required to give evidence in criminal or disciplinary proceedings, the Local Authority will arrange for you to receive advice about the procedure. The governing body accepts that you need to be assured that the matter has been properly addressed. Subject to legal constraints, you will be informed of the outcome of any investigation.

9. The responsible officer

The Chair of Governors has overall responsibility for the maintenance and operation of this policy. The Chair maintains a record of concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report as necessary to the Local Authority.

10. How the matter can be taken further

If you feel unable to raise concerns internally, or are dissatisfied with the internal handling of serious malpractice, you may contact the following external prescribed bodies:

- **NSPCC Whistleblowing Advice Line**: 0800 028 0285 | Email: help@nspcc.org.uk (Dedicated statutory line for school professionals raising workplace child protection concerns).
- **Protect (formerly Public Concern at Work)**: 020 3117 2520 | Website: https://protect-advice.org.uk (Free, confidential legal whistleblowing advice).
- **Ofsted Whistleblowing Hotline**: 0300 123 3155 | Email: whistleblowing@ofsted.gov.uk.
- **Department for Education (DfE) Incident & Counter-Extremism Line**: 020 7340 7264.
- **Trade Union or Professional Association**.

If you do take the matter outside the school and Local Authority you should ensure that you do not contravene your contract of employment by disclosing confidential information.

11. Policy Review

This policy will be reviewed annually in conjunction with the Safeguarding & Child Protection Policy, or sooner in response to updates to Keeping Children Safe in Education (KCSIE) or statutory whistleblowing legislation.