



Whistleblowing

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1. Values

Employees are often the first to realise that there may be something seriously wrong within the School. **Normally, employees would be expected to raise any concerns initially with their Head Teacher.** However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the school, or that it is easier to ignore the concern rather than report it. They may also fear bullying, harassment or victimisation. This policy is aimed at making sure, as far as reasonably practicable there is a safe environment to raise issues of concern.

2. Employee Obligations

All employees have a legal and moral responsibility to report improper acts and omissions. In some circumstances, failure to raise such concerns may amount to breach of contract or breaking the law.

Anyone who raises a concern (if it is a qualifying disclosure) is protected by the Public Interest Disclosure Act 1998 which is incorporated into the Employment Rights Act 1996. This Whistleblowing Policy is intended to encourage and enable employees to raise serious concerns rather than overlooking a problem or 'blowing the whistle' outside.

3. Application of the policy

The policy applies to all employees and those contractors working for the school on its premises, for example, volunteers, agency staff, builders etc.

The holding of any data in connection with this procedure will comply with the Data Protection Act 2018 and the General Data Protection Regulation.

4. Aims of the policy

This policy aims to:

- encourage people to feel confident in raising serious concerns and to question and act upon concerns about practice, including those that are made in the public interest
- provide guidelines for people to raise concerns and receive feedback on any action taken
- ensure that people receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied
- reassure people that they will be protected from possible reprisals or victimisation.

5. Areas the policy covers

The following are the areas of disclosure that would be covered under this policy:

- **criminal offence** – for example, if an employer has been trying to bribe people
- the breach of a legal obligation by an organisation
- **miscarriage of justice** – for example, if a member of staff has been fired for something that turned out to be a computer error
- **someone's health and safety being in danger** – for example, if an employer has forced staff to serve food they know has been contaminated
- **damage to the environment** – for example, if an employer has been regularly polluting local rivers
- **sexual harassment** – from April 2026, the Employment Rights Act protects employees who have made a sexual harassment whistleblowing allegation

A whistleblowing concern can also be raised about someone trying to cover up information about any of issues above.

It should be emphasised that this policy is intended to assist employees who believe they have discovered malpractice or impropriety. It is not designed to question financial or management decisions taken by the School, nor should it be used to reconsider any matters which have already been, or are currently being, addressed under the bullying, harassment, complaints, grievance, disciplinary or other procedures. This includes concerns about breaches of an employee's own employment contract which should be dealt with using the grievance procedure.

Sometimes the concern raised can be a personal grievance rather than a whistleblowing complaint. Any raised concern under this policy has to be in the public interest. The link below provides further guidance on whistleblowing and grievances to help make the distinction clear: www.acas.org.uk/grievances

6. Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal an employee's identity if they so wish. At the appropriate time, however, an employee may need to be a witness, for instance if the matter leads to a disciplinary hearing or a criminal prosecution.

In some cases, confidentiality may not be possible. For instance, if you report abuse or a criminal offence, then the person you tell may have to take some action. If it does become necessary to reveal your identity, you will be consulted before this action is taken. If there is an unauthorised disclosure of your identity, disciplinary action may be taken against that individual.

7. Anonymous Allegations

The procedure encourages employees to put their name to an allegation whenever possible. Concerns expressed anonymously are much harder to investigate but will be considered; the factors to be taken into account would include the seriousness of the issues raised and the credibility of the concern.

It should be noted that anonymous whistleblowers will not be able to receive feedback and that actions taken to look into the disclosure could be limited.

8. Untrue Allegations

If an employee makes an allegation, but it is not confirmed by the investigation, no action will be taken against them. If, however, an employee makes an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken.

9. Harassment or Victimisation

The School is committed to good practice and high standards and wants to be supportive of employees making the decision to report a concern. If an employee believes that what they are saying is true, they should have nothing to fear they will be doing their duty to their employer and those for whom they are providing a service.

The School will not tolerate any bullying, harassment or victimisation (including informal pressures) and will take appropriate action to protect employees when they raise a concern.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary, redundancy or other procedures that already affect employees.

10. Support for Employees

Employees who raise concerns or who are the subject of an investigation can access confidential counselling through the Employee Assistance Programme.

11. How to raise a concern

You should raise this in the first instance with your line manager. The earlier you raise your concern, the easier it will be to take action. Evidence does not need to be provided for your concerns to be raised and considered. Remember, if in doubt, raise it.

If you feel unable to raise the issue with your line manager, or if your line manager does not act on your referral, you should approach a member of the School Senior Leadership Team.

Whether or not it will be considered reasonable for you to be able to discuss the issue with your manager depends on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For instance, if you have previously attempted, unsuccessfully, to raise the issue with your manager or where you believe that the malpractice will only be dealt with by reporting it elsewhere, then you should raise your concerns directly with school's external Whistleblowing contact: Jacqueline Currey, Governor Services Manager (jacqueline.currey@blackpool.gov.uk).

You may wish to consider discussing your concern with a colleague in some circumstances, as it can be easier to raise concerns if there is more than one witness.

You are entitled to be accompanied by a trade union representative or work colleague at any meetings or interviews in connection with concerns you have raised. If your chosen representative is someone who is a witness, or clearly someone who will need to be interviewed in his or her own right, an alternative should be chosen.

12. Line managers

Line managers have a responsibility to ensure that concerns are taken seriously and should support their direct reports in referring the matter to the appropriate contact.

13. Designated Whistleblowing Contact

If you feel unable to talk to your Line Manager (because of circumstances outlined above), you should contact the school Designated Whistleblowing Contact - Jacqueline Currey, Governor Services Manager (jacqueline.currey@blackpool.gov.uk) - directly and formally inform them of your concerns. You may be asked to complete a referral using the form in Appendix 2.

The Designated Whistleblowing Contact will then refer your concern to an Expert Panel using the form set out in Appendix 3.

A further trigger for convening the Panel would be a referral from the Employee Relations Team immediately when a member of that team becomes aware of an employee complaint/ grievance submission which may meet the whistleblowing definitions within this policy. This referral would go to Head of Human Resources who would convene the Panel.

The Designated Whistleblowing Contact (or HR Advisor if raised via the Employee Relations Team) will write to you within ten working days (wherever reasonable possible) of a concern being raised to:

- acknowledge that the concern has been received
- indicate how the matter will be dealt with (e.g. a referral to the Expert Panel)
- where applicable, give an estimate of how long it will take to provide a final response
- inform you about staff support mechanisms.

14. Expert Panel

The Panel would consist of:

- Blackpool Council Monitoring Officer (Chair)
- Blackpool Council Head of Audit and Risk
- Blackpool Council Head of Human Resources.

In the event of a Member of the Panel not being available or having a conflict of interest then a designated Deputy will substitute for the Panel Member.

The Panel would be convened as and when required. The Designated Whistleblowing Contact who has submitted the referral on behalf of the complainant will attend the Panel to act as the link person with the complainant. For a referral from the Employee Relations Team then the attendee will be the relevant HR Adviser.

The role of the Panel would be to review the complaint and determine whether or not it falls under the whistleblowing criteria – if it is deemed not to be a clear rationale as to why, will be documented for sharing with the complainant and suggestions will be made as to how the concerns should be taken forward in another way.

If it is accepted under the policy, the Panel will:

- determine any immediate communication required to complainant for example regarding support
- agree and document next steps required
- agree which member of the Panel will provide additional oversight of the case to ensure it progresses in accordance with policy and timelines (Panel members will share this responsibility so it will rotate).

The Expert Panel will try to ensure consensus on any decision it needs to consider but as the Responsible Officer, the Monitoring Officer (or in their absence the Deputy Monitoring Officer) will make the final decision.

15. How the Expert Panel will respond

The Panel will respond to any concern raised via the Designated Whistleblowing Contact. Where appropriate, the matters raised may:

- be investigated by management or risk services,
- be investigated under another procedure, eg child / adult protection
- be referred to the Lancashire Constabulary
- be referred to the Monitoring Officer
- be referred to the external auditor
- form the subject of an independent inquiry.

The Expert Panel, if it agrees that the referral meets whistleblowing criteria, will appoint an Investigating Officer who will investigate your concern. Managers of investigating officers must make reasonable allowances as regards time and workload to enable them to carry out a thorough and swift investigation.

If, during the investigation, you are concerned about what progress is being made, require support or reassurance, or feel you may be being victimised or harassed as a result of making the disclosure, you should contact your Designated Whistleblowing Contact.

In order that you can be assured that your concern has been properly addressed, then - subject to legal constraints and following the investigation - the Designated Whistleblowing Contact will write to you to inform you of the outcome. However, this will not include details of any disciplinary action, which will remain confidential to the individual/s concerned.

16. The Responsible Officer

Blackpool Council Assistant Chief Executive (Governance), in their role as Monitoring Officer has overall responsibility for the maintenance and operation of this Policy and Procedure. Designated Whistleblowing Contacts will report all concerns reported under this Procedure. The Monitoring Officer will keep a record of all concerns raised and the outcomes and will report to the Council's Standards Committee on an annual basis or more often, as appropriate.

17. How the matter can be taken further - disclosure to regulatory bodies

This procedure is intended to provide you with an avenue within the school and local authority to raise concerns. If you feel that your concern has not been dealt with satisfactorily and that it is right to take the matter externally, then you should seek advice from the Designated Whistleblowing Contact in the first instance.

If you still feel that the matter has not been dealt with satisfactorily then there are a number of possible external contact points, further details of which are given in Appendix 1.

A disclosure to a regulatory body will be **protected in line with [Part IV of the Employment Rights Act 1996 – the Public Interest Disclosure Act](#)** if you have a reasonable belief that malpractice has occurred, is occurring or is likely to occur and you honestly and reasonably believe that the information and any allegation within it are substantially true.

You should ensure that you do not disclose confidential information unless it is considered in the public interest to do so. It should be noted that a confidentiality clause in an agreement does not prevent a worker from making a disclosure as long as it is in the public interest. Please check with your internal or external contact for clarification on these points.

Appendix 1: External organisations / regulatory bodies
(and the matters they would deal with)

Public Sector Audit Appointments Ltd (PSAA) Proper conduct of public business, value for money, fraud and corruption in local government and health service bodies	The Environment Agency Acts or omissions which have an actual or potential effect on the environment
Her Majesty's Chief Inspector of Education, Children's Services and Skills Matters relating to the regulation and inspection of establishments and agencies for children's social care services	Health and Safety Executive Health and safety of individuals at work, or the health and safety of the public arising out of or in connection with the activities of persons at work
Certification Officer Fraud and other irregularities, relating to the financial affairs of trade unions and employers' associations	The Pensions Regulatory The protection of members' benefits under occupational and private pensions schemes
The Charity Commission for England and Wales Administration of charities and of funds given or held for charitable purposes	Local Government Ombudsman Council maladministration
Care Quality Commission The administration of adult social care services	Children's Commissioner Matters relating to the rights, welfare and interests of children in England
Commissioners for Her Majesty's Revenue and Customs About the administration of UK taxes; the administration of N.I. and tax credits systems; Custom and border-related functions and criminal investigations	The Information Commissioner Compliance with the requirement of legislation relating to data protection and to freedom of information
The Controller and Auditor General About the proper conduct of public business, value for money, fraud and corruption in relation to the provision of public services	For further information – see government guidance: Whistleblowing : full list of prescribed people and bodies

Appendix 2: Whistleblowing Reporting Form

If you need this form in an accessible / alternative format please contact employeerelations@blackpool.gov.uk

Description of the concern
Where possible include: • Dates of incidents • Who was involved • Why this is a concern • Whether there were any other witnesses • Whether you have tried to raise this with your manager • What the result was
[continue on separate sheet if necessary]

You are encouraged to put your name to this report. Concerns expressed anonymously are much harder to investigate but will be considered at the discretion of the Monitoring Officer.

Your contact details:	
Name:	
Address:	
Department / organisation:	
Telephone number:	
Email:	
Date:	

[To be completed by Designated Whistleblowing Contact on receipt of report]

Designated Whistleblowing Contact name:		Date of receipt:	
Department:		Reference:	

Appendix 3: Record of advice/action by the Designated Whistleblowing Contact

To be completed by Designated Whistleblowing Contact on receipt of report			
Designated Officer:		Date of receipt:	
Department:		Reference:	

Description of the concern:	
Where possible include: - Dates of incidents - Who was involved - Why this is a concern - Whether there were any other witnesses - Whether this was raised with the line manager - What the result was	
Advice given (including if no further action was taken):	

Please note: Whistleblowing Contacts must report all concerns reported under this procedure to the Monitoring Officer who will keep a record of all concerns raised and the outcomes.