Whistleblowing Policy - Employees

Policy Statement

The Harpur Trust seeks to run all aspects of its activities with full regard for high standards of conduct and integrity. The Harpur Trust is committed to ensuring that malpractice is prevented and, should it arise, immediately dealt with. Employees should be fully aware to whom they can and should report public interest issues. The Trust encourages employees to raise their concerns about any malpractice internally at the earliest possible stage and this procedure sets out the correct method for raising such concerns and the general principles of how matters should be handled. It does not, however, confer any contractual rights.

Definition

The Public Interest Disclosure Act (1998) "PIDA" defines whistleblowing as 'the disclosure by an individual or professional of confidential information which relates to some danger, fraud or other illegal or unethical conduct connected with the workplace, be it of the employee or his/her fellow employees'.

The Act is intended to encourage you to raise your concerns in a responsible way where there is a practice within an organisation which threatens public interest and to make you aware that if you do raise a concern you will be protected from subsequent victimisation, provided that you follow the steps laid down in this procedure.

Aims

The aims of this policy are to:

- Encourage employees to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- Provide employees with guidance as to how to raise those concerns; and
- Reassure employees that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken

Qualifying disclosure

The Act seeks to provide protection for disclosure of information within a wide category of 'qualifying disclosures'.

You will be protected if you make a qualifying disclosure that is made in the public interest (a whistleblowing concern) and which is an allegation of one of the following:

- that a criminal offence has been or is likely to be committed;
- safeguarding concerns (see below);
- that a person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject;
- a miscarriage of justice has occurred, is occurring or is likely to occur;
- that the health and safety of any individual has been, is being or is likely to be in danger;
- that sexual harassment has occurred, is occurring or is likely to occur;
- bribery;
- financial fraud or mismanagement;

- other unlawful or unethical conduct in the workplace
- that the environment has been, is being or is likely to be damaged; or
- that information intending to show any matter falling within the above categories has been, is being or is likely to be deliberately concealed.

Complaints relating to breaches of an employee's own contract of employment or personal circumstances in the workplace should be raised as a grievance.

Safeguarding

Nothing within this policy is intended to prevent employees from complying with their statutory obligations in accordance with Keeping Children Safe in Education (DfE, September 2026). In particular:

- Safeguarding/Child Protection Policy: If you have any concerns about a pupil's welfare, action should be taken immediately (even if they are low level concerns). You should report the concern to the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead. in accordance with the Trust's Safeguarding Policy and/or School Child Protection Policy.
- Safeguarding – member of staff: You should raise any concerns about another staff member (even if they are low level concerns) with the Head/Chief Executive or if the concern is about the Head, with the Chair of Governors (without first notifying the Head) in accordance with the procedures in line with the School's Child Protection Policy.
- Whistleblowing Policy: You should follow this procedure to raise concerns about poor or unsafe practices at the Trust or School or potential failures by the School or staff to properly fulfil its safeguarding responsibilities.

Procedure for making a Whistleblowing Allegation

To make a qualifying disclosure you should, in the first instance, inform your line manager who will attempt to resolve the matter as soon as is reasonably practicable. If the line manager is implicated in the disclosure the Head or Operational Lead [CEO for HTO] should be the first point of contact. If the action taken is not satisfactory to the discloser, or if the discloser so prefers, the Chair of the School Governing Body or the Trust (for HTO) should be informed before an external disclosure is made. Each point of contact will attempt to resolve the matter as soon as is reasonably practicable.

Respecting Confidentiality

Wherever possible, the Trust will respect the confidentiality and anonymity of the discloser and will, so far as is reasonably practicable, protect the identity of the discloser. However, it must be recognised that in certain circumstances it will be difficult for the Trust to pursue a complaint or to tackle an alleged wrongdoer without the discloser's identity becoming known.

Safeguarding Against Reprisal, Harassment and Victimisation

The Trust will not tolerate harassment or victimisation of any employee when a matter is raised in accordance with the PIDA provisions. Any such instances of harassment or victimisation shall be dealt with under the Trust's Harassment & Bullying and Disciplinary policies.

Making A Disclosure

Once a qualifying disclosure has been made, an appropriate manager will hear the allegation/ complaint. The person hearing the complaint will arrange a confidential meeting with you and may require you to put the allegation in writing prior to the meeting. The concern will then be

discussed in full at the meeting and the person hearing the complaint will decide if any further action needs to be taken and, if so, what action. This may include requiring you to attend a further meeting with a more senior level of management and to provide any additional evidence deemed necessary.

A note of any decision made at the stage will be provided to you and you must treat this document as strictly confidential.

If the concern raised is found to be valid and is not already subject to internal or legal proceedings, a decision will be taken by the hearing manager about how to proceed, which may include referral of the matter, or the person who has made the disclosure to one or more of the following:-

- the Head or Operational Lead with a view to internal investigation;
- the School Governing Body with a view to internal investigation;
- the appropriate external regulatory body for investigation;
- the Police.

You will be informed of any decision taken and are required to keep this decision strictly confidential.

Exit interviews

All staff are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during the course of their employment in accordance with this policy. Safeguarding children is at the centre of the Trust's culture and concerns should always be raised as outlined above. If issues have not been identified before, safeguarding will always be considered formally during staff performance development reviews and finally at exit interviews which are held with leavers.

Further action

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. The law recognises, as does the paragraph above relating to Safeguarding, that in some circumstances it may be appropriate for you to report your concerns to a relevant outside body including:

- The local authority's Designated officer;
- Children's Social Care;
- The NSPCC;
- The Health and Safety Executive;
- The Environment Agency;
- The Information Commissioner;
- The Department for Education;
- The Department for Business, Innovation and Skills
- The Police;
- The Charity Commission;
- The Independent schools Inspectorate;
- The Boarding Schools Association

Employees are strongly encouraged to seek advice before reporting a concern to anyone external. In most cases you should not find it necessary to alert anyone external but before you do, as well as considering the internal help and support available which is identified above, please seek external advice from the following:

EthicsPoint: For a confidential service, contact them via wrs.expolink.co.uk/theharpurtrust or 0800 374199. This is an independent external service.

Protect: If you have any concerns about disclosing a suspected wrongdoing, the independent whistleblowing charity, Protect operates a confidential helpline. Staff can call 020 7404 6609 for advice.

NSPCC: The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0808 800 5000 or email help@nspcc.or.uk

The Modern Slavery helpline: The Modern Slavery helpline is available for staff who do not feel able to raise concerns about modern slavery internally. Staff can call on 0800 0121 700.

The Media

You should under no circumstances approach a commercial body or the media with details of the suspected wrongdoing. If you approach any such body and/or where your concern is disclosed in a malicious manner or for personal gain the protection given to you by this procedure may be lost. Additionally, the Trust/School may consider this to be gross misconduct and disciplinary action may be taken against you.

Confidentiality

The Trust has a duty of confidentiality to all its employees, the pupils at our schools, the parents and members of the community. Employees are reminded that they too have a general duty of confidentiality in respect of information which they obtain through their employment with the Trust.

Rhian Castell

Chair of the Harpur Trust **December 2025**

Controlled Document Template:

Date of Review	Amendment/Reason for Review	Authorised By
28.8.2020	Changed the date of Keeping Children Safe in Education to 2020	D Rostron
26.08.2021	Updated Keeping Children Safe in Education to 2021	D Rostron
26.08.2021	Added in wording about low level concerns to the Safeguarding paragraph	D Rostron (VWV Update)
August 2022	No changes	D Rostron
August 2023	Changed title from Bursar to Operational Lead Updated NSPCC helpline Number	Denise Rostron Internal HR & Training Consultant
August 2024	Updated reference KCSIE to 2024 (as opposed to 2023 Changed title of Dignity at Work Policy to Harassment & Bullying Policy Signatory Update	Denise Rostron Internal HR & Training Consultant
September 2025	Amendments made for terminology (School Governing Body) Distinction made for employee policy (external stakeholder policy to be separate) Addition of title of external whistleblowing site	Denise Rostron Internal HR & Training Consultant
23/7/2026	Added in '• that sexual harassment has occurred, is occurring or is likely to occur;' under qualifying disclosures Removed reference to Ethics Point Speaking Up App as no longer in existence Added a paragraph relating to Exit Interviews	Denise Rostron Internal HR & Training Consultant in line to changes from VWV
06/10/26	Changed the date of Keeping Children Safe in Education to 2026	S McMullan

Linked documents

- Every
- Employee Handbook
- Company News – HR Policies & Whistleblowing