

Reigate Grammar School Group

Whistleblowing Policy

Including Early Years Foundation Stage

Policy Author:	Sarah Arthur, Senior Deputy Head
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Introduction

The Reigate Grammar School Group has adopted this policy and the accompanying procedure on whistleblowing to enable members of staff to raise concerns internally and in a confidential fashion about child protection, fraud, bribery, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations or unethical conduct. The policy also provides, if necessary, for such concerns to be raised outside the School's internal organisation.

This policy is available across the RGS Group to employees, workers, supply and agency staff, contractors, volunteers and students or trainees undertaking placements or work within the Group of Schools. Statutory protection under whistleblowing legislation will depend on an individual's employment status and the circumstances of the disclosure.

If staff require confidential, external advice around any aspect of Whistleblowing, they may contact **PROTECT**. This is a whistleblowing charity offering free confidential legal advice to employees, helping individuals decide if and how to take a concern forward.

Website: <https://protect-advice.org.uk/>

Elements of the Policy

In accordance with Lord Nolan's Second Report of the Committee on Standards in Public Life, the School's policy on whistleblowing is intended to demonstrate that the School:

- will not tolerate malpractice;
- respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

Procedure

This procedure is separate from the School's adopted procedures regarding grievances. Individuals should not use the whistleblowing procedure to raise grievances about their personal employment situation.

This procedure is to enable members of staff to express a legitimate concern regarding suspected malpractice within the School including any concerns, no matter how remote or apparently unsubstantiated, related to child protection issues.

Malpractice is not easily defined; however, it may include fraud, financial irregularities, corruption, bribery, dishonesty, criminal activity, sexual harassment, failure to comply with a legal obligation, a miscarriage of justice, danger to health and safety, damage to the environment, the deliberate concealment of information relating to any of these matters, or other serious unethical conduct.

Confidentiality

The School will take reasonable steps to maintain the confidentiality of any person raising a concern under this procedure where this is requested. Information about the concern, including the identity of the person raising it, will only be shared with those who need to know in order for the matter to be properly considered or investigated.

There may be circumstances in which it is not possible to preserve complete confidentiality, for example where disclosure is required by law or is necessary for the proper investigation of the concern. Where possible, the individual will be informed before their identity is disclosed.

Concerns may be raised orally or in writing.

Anonymous Concerns

Concerns may be raised anonymously. However, it may be more difficult for the School to investigate a concern fully or to provide feedback where the identity of the person raising the concern is not known. Individuals are therefore encouraged, where they feel able to do so, to provide their name and contact details when raising a concern.

A person raising a concern does not need to provide proof of the wrongdoing before the concern will be considered. They should provide as much information as they reasonably can to explain the basis of their concern.

The Investigation

A concern may be raised with the Headteacher of the relevant School, the Designated Safeguarding Lead where the concern relates to safeguarding practice, or another appropriate member of the senior leadership team. Each School will ensure that staff know the appropriate senior leaders to whom a concern may be raised.

Where the concern relates to the Headteacher, it should be raised with the Chair of Governors. Where an individual feels unable to raise the concern through these internal routes, they may use the external routes set out in this policy.

Any concern raised will be acknowledged as soon as possible, considered promptly and, where appropriate, investigated thoroughly and in a timely manner. The person raising the concern will, where possible, be informed that their concern has been received and will be kept appropriately informed of progress. Subject to confidentiality, data protection and the rights of others, they will be informed when the process has concluded and, where appropriate, of the outcome.

A member of staff who is not satisfied that their concern is being properly dealt with will have a right to raise it in confidence with the Headteacher and thereafter if the matter is not resolved with the Chair of Governors.

Whistleblowing and Safeguarding

All staff and volunteers should feel able to raise concerns about poor or unsafe safeguarding practice or potential failures in the School's safeguarding provision. Such concerns will be taken seriously by the senior leadership team.

Concerns about poor or unsafe safeguarding practice may include failures relating to child protection procedures, online safety, filtering and monitoring arrangements, inappropriate use of technology or AI, inappropriate communications, or other failures to protect children from harm.

A concern about the welfare or safety of an individual child should be reported without delay in accordance with the School's Safeguarding and Child Protection Policy.

Concerns or allegations about the conduct of an adult working or volunteering with children, including concerns which may fall below the harm threshold, should be reported and managed in accordance with the School's Safeguarding and Child Protection Policy and Low-Level Concerns Policy. Where a concern relates to the Headteacher, it should be reported to the Chair of Governors.

Where a member of staff feels unable to raise a safeguarding concern internally, or believes that a genuine concern about safeguarding practice is not being addressed appropriately, they may contact the NSPCC Whistleblowing Advice Line:

Telephone: **0800 028 0285**

Email: help@nspcc.org.uk

External Procedures

Depending on the nature of the concern, relevant prescribed persons may include the Secretary of State for Education (for matters relating to independent schools), the NSPCC (for matters relating to child welfare and protection), the Charity Commission (for matters concerning the proper administration of charities),

HM Revenue and Customs or the Health and Safety Executive. The current list of prescribed persons and their areas of responsibility is published on GOV.UK.

For EYFS provision, concerns about a provider may also be raised with Ofsted through its complaints procedure, in accordance with the EYFS statutory framework. Safeguarding concerns may also need to be referred through the appropriate local safeguarding procedures, including the LADO where relevant.

Unsubstantiated or Malicious Concerns

A member of staff will not be subject to disciplinary action simply because a concern raised under this policy is subsequently found to be mistaken or unsubstantiated. However, where there is clear evidence that an allegation has been made knowingly falsely or maliciously, the matter may be considered under the School's Disciplinary Procedure.

Protection from Reprisal or Victimisation

No member of staff will suffer a detriment or be disciplined for raising a concern which they reasonably believe is in the public interest, even if that concern is ultimately found to be mistaken or unsubstantiated.

Links to other policies:

- Low Level Concerns
- Online Safety Policy
- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Staff Induction