STOCKPORT GRAMMAR SCHOOL

PROTECTED DISCLOSURE (WHISTLEBLOWING) POLICY

(Approved by Governors 13.10.2026)

Whistleblowing policy

1 **Honesty and integrity**: The School is committed to conducting its business with honesty and integrity, and the expectation is for all staff to maintain high standards in accordance with the Code of Conduct. All organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur. Stockport Grammar recognises that employees are often the first to realise that there may be something seriously wrong within an organisation.

2 **Aims**: The aims of this policy are to:

2.1 encourage staff 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;

2.2 provide staff with guidance as to how to raise those concerns; and

2.3 reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken. It is recognised that raising such a concern may be stressful and while personal support will be provided to an individual, they are also encouraged to find additional, impartial support via the Employee Assistance Programme. Staff should contact the HR Manager for details if they are unable to locate the regular reminder emails about this service.

3 **Staff**: This policy covers all employees, officers, governors, consultants, contractors, volunteers, work placement students, trainees and apprentices, casual workers and agency workers. Other individuals who work or have worked within the organisation, such as former staff, volunteers, the self-employed and contractors, are also encouraged to use it.

4 The policy will be freely available and displayed on the School Policy Drive on the network. Training will also be provided as part of induction and periodically as a reminder to all.

Wrongdoing at work

5 **Whistleblowing**: Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity (such as insurance fraud or illegal tax evasion);
- safeguarding concerns (see paragraph 10 below);
- failure to comply with any legal or professional obligation or regulatory requirements;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- bribery;
- financial fraud or mismanagement;
- other unlawful or unethical conduct in the workplace (which could include bullying);
- the deliberate concealment of any of the above matters.

6 **Whistleblower**: A whistleblower is a person who raises a genuine concern relating to any of the above. If staff have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) they should report it under this policy.

7 **Grievances**: This procedure should not be used where someone has a complaint relating to their personal circumstances in the workplace. The grievance procedure should be used in such cases.

8 **Detriment**: Provided that this procedure is used appropriately and correctly, staff will not suffer any detriment as a result of reporting a suspected wrongdoing. A failure to follow this procedure may however make the disclosure unreasonable and the protection given by this procedure may be lost.

9 **Advice**: If staff are uncertain whether something is within the scope of this policy, they should seek advice from the Head or Bursar, Designated Safeguarding Lead, Protect, the NSPCC whistleblowing helpline or the Modern Slavery helpline.

Safeguarding

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

10.1 **Safeguarding / child protection policy:** If staff have any concerns about a pupil's welfare, action should be taken immediately (even if they are low level concerns). They should report the concern to the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead. See the School's child protection and safeguarding policy and procedures for full information about what to do if there is a concern about a pupil, including what to do if the Designated Safeguarding Lead is not available.

10.2 **Safeguarding - member of staff:** Staff should raise any concerns about another staff member (even if they are low level concerns) with the Head, or if the concern is about the Head, with the Chair of Governors (without first notifying the Head) in accordance with the procedures in the School Safeguarding Policy and Procedures.

10.3 **Whistleblowing policy:** Staff should follow this procedure to raise concerns about poor or unsafe practices at the School or potential failures by the School or staff to properly fulfil its safeguarding responsibilities.

11 **The Modern Slavery helpline**: The School is committed to the prevention of Modern Slavery. If staff have any queries relating to Modern Slavery, they should contact the Designated Safeguarding Lead. Identified instances of modern slavery should be immediately notified to the police. If staff think they have identified an instance of modern slavery, or if someone considers that they may be a victim of modern slavery they may contact the Modern Slavery helpline on 0800 0121 700.

12 **Review**: 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 school's culture and concerns should always be raised in accordance with paragraph 10 above. If issues have not been identified before, safeguarding will always be considered formally during staff performance development reviews and appraisal and finally can be raised at any exit interview held with a member of staff who is leaving. Staff who raise concerns about working practices at the School to the Designated Safeguarding Lead or an appropriate senior member of Staff will be protected from detriment under this policy.

Confidentiality

13 **Confidentiality**: We hope that staff will feel able to voice whistleblowing concerns openly under this policy because it is easier for the school to follow it up. However, if staff want to raise concerns confidentially, the school will make every effort to keep a persons' identity secret. If it is necessary for anyone investigating a concern to know a persons' identity, we will discuss this with the staff member. The school will not disclose the whistleblower's identity without their consent unless there are legal reasons that require them to do so. This might be, for example, where the information is about a child or vulnerable adult who is at risk, or where there is a possible criminal offence. If this is the case, Stockport Grammar may have to tell the police or other official body, or if required to do so by a court. The school will let the individual know if it has to do this.

14 **Anonymous disclosures**: Stockport Grammar does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if it is not possible to obtain further information from the whistleblower. It is also more difficult to establish whether any allegations are credible and nor is it possible to give any feedback about any action the school takes.

How Stockport Grammar will respond

15 Any concern raised under this policy will be investigated thoroughly, promptly and confidentially.

16 Any approach to line managers and senior staff will be treated with the strictest confidence and the member of staff's identity will not be disclosed without their prior consent. All members of staff will be treated with respect at all times.

17 There will be a meeting with the member of staff raising the concern to ensure that there is full understanding of the situation raised.

18 When any meetings are arranged, the member of staff has the right to be accompanied at that meeting. This meeting can be off site if requested.

19 When an individual makes a disclosure, the school will process any personal data collected as part of the investigation in line with the School Data Protection Policy and Privacy Notices which can be found on the School Policy Drive and on the school website. Data will be stored securely and only accessed by individuals essential for dealing with the disclosure.

20 The member of staff who raises the concern will be told how long to expect the investigation to take if it is not possible to stick to the time limits suggested below. The staff member will be kept up to date with progress wherever possible.

21 The matters raised will be investigated internally. Where it is not possible to resolve the matter within a few days with the line manager, someone suitably independent within the organisation will carry out an investigation. In the most serious of cases, or where it is in the school's interest to do so, the school may involve the services of suitably qualified independent experts as part of its investigation, or in taking recommendations, to prevent any recurrence of wrongdoing within the organisation.

22 Any investigation will be objective and evidence based and will aim to produce a report that focuses on identifying and rectifying any issues and learning lessons to prevent recurrence. The investigator may decide that the matter would be better looked at under another process, such as the Grievance procedure or the Dignity at Work procedure.

23 On conclusion of any investigation, the member of staff will be told the outcome of any investigation and what Stockport Grammar has done or proposes to do, about it. Wherever possible, the investigation report will be shared with the person who

raised the concern (while respecting the confidentiality of others). If no action is to be taken, the reasons will be explained.

24 If an individual is not satisfied with the response received and any subsequent action taken, they should put their concerns in writing to the Chair of Governors who will arrange for further investigation as they think appropriate.

The procedure for investigating matters raised under this policy

25 **Procedure:** Staff should disclose the suspected wrongdoing first to their Head of Department / Line Manager. In the event that the Head of Department / Line Manager is involved in the suspected wrongdoing, they should proceed directly to the Head or Bursar. If the Head or Bursar are involved in the suspected wrongdoing, they should proceed directly to the Chair of Governors (chair@stockportgrammar.co.uk).

26 **Concerns should be raised in writing (including email)**. The letter/email should set out the background and history of the concerns, giving names, dates and places where possible and the reason for the disclosure. If an individual does not feel able to make the disclosure in writing, an interview can be arranged. When any meetings are arranged with an individual who is making a protected disclosure, they have a right to be accompanied. Any meetings can be off site if appropriate. If staff wish to raise a matter in confidence, or if reasonable adjustments are required, they should please say this at the outset so that appropriate arrangements can be made.

27 **Proof:** It is not necessary for the member of staff to have definitive proof that wrongdoing is being, has been, or is likely to be committed. A reasonable belief is sufficient to disclose the concern. The member of staff has no responsibility for investigating the wrongdoing. It is the school's responsibility to ensure that an investigation takes place.

28 **Response:** Staff can expect a response detailing to whom the disclosure has been notified or any action taken within seven days of your Head of Department / Line Manager becoming aware of the disclosure.

29 **Procedure:** If no response is forthcoming after seven days from the Head of Department / Line Manager, if the staff member is not satisfied with the way in which the concern has been handled or if the Head of Department / Line Manager is involved in the suspected wrongdoing they should escalate the matter to the next level of seniority within the School (i.e. the Head, Bursar or Chair of Governors as appropriate).

30 **Response:** Staff can expect a response detailing any action taken within seven days of the Head / Bursar or Chair of Governors becoming aware of the disclosure. The member of staff who raises the concern will be told how long to expect the investigation to take if it is not possible to stick to this time limit. The staff member will be kept up to date with progress wherever possible.

Relevant external reporting

31 **Outside body**: 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 paragraph 10 above, that in some circumstances it may be appropriate for someone to report concerns to a relevant outside body including:

- the local authority's Designated Officer (LADO);
- Children's Social Care;
- the NSPCC;
- the Health and Safety Executive;
- the Environment Agency;

- the Information Commissioner;
- the Department for Education where referrals can be made at www.gov.uk/contact-dfe;
- the Department for Business, Energy and Industrial Strategy;
- the police;
- the Charity Commission;
- the Independent Schools Inspectorate; or
- the Channel Police Practitioner.

32 **Advice**: Staff are strongly encouraged to seek advice before reporting a concern to anyone external. In most cases it should not be necessary to alert anyone external but before doing so, as well as considering the internal help and support available which is identified above, staff are advised to please seek external advice from:

32.1 **Protect**: If someone has any concerns about disclosing a suspected wrongdoing the independent whistleblowing charity, Protect, operates a confidential helpline. Staff can call 020 3117 2520 for advice.

32.2 **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 0800 028 0285 (12pm to 4 pm Monday to Friday) or email help@nspcc.org.uk. The website address is www.nspcc.org.uk.

32.3 **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.

33 **The media:** Staff should under no circumstances approach a commercial body or the media with details of a suspected wrongdoing. If a staff member approaches any such body and / or where a concern is disclosed in a malicious manner or for personal gain this may make the disclosure unreasonable and the protection given by this procedure may be lost. Additionally, the School may consider this to be gross misconduct and disciplinary action may be taken.

34 **Queries:** If anyone has any queries about this procedure, they should contact the Head or Bursar. Further advice can also be found at www.gov.uk/whistleblowing

Authorised by Chair of Governors	
Date	13.10.2026
Circulation	Governors / teaching staff / all staff / parents / website
Status	Regulatory