



ELTHAM COLLEGE
FAMILY OF SCHOOLS

Whistleblowing Policy

For the Eltham College Family of Schools

Last reviewed: September 2025



Version Control Information

Reason For Amendment	Name	Date	Main changes
Annual Review		August 2016	Re-formatted
Annual Review		August 2017	None
Reviewed for conditional language	HR Manager	February 2018	Removal of conditional language
Annual review	Ann Massey	August 2021	Link to NSPCC site renewed
Annual review	Ann Massey	August 2022	None
Review linked to School merger	Bursar	November 2023	Amended to reflect merger with Blackheath Prep and updated to reflect latest ISBA model policy. Clarified relationship between this policy and the Neutral Notifications Policy.
Annual Review	Bursar	July 2024	Corrected the “Protect” charity Helpline number
Annual Review	Bursar	September 2025	Clarified that Whistleblowing complaints can be made by staff, volunteers or students



Introduction

Eltham College Family of Schools (Eltham College Senior School, Eltham College Junior School and Blackheath Prep) have adopted this policy and the accompanying procedure on whistleblowing to enable members of staff (including volunteers and students) to raise concerns internally and in a confidential fashion about child protection, fraud, 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.

2. About this Policy

The Schools are committed to conducting their business with honesty and integrity and expect all staff to maintain high standards in accordance with our Staff Handbook including the Code of Conduct. However, 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.

3. Aims

The Schools' policy on whistleblowing is intended to demonstrate that it:

- will not tolerate malpractice
- encourages staff, volunteers or students to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated, as appropriate
- respects the confidentiality of those 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 only invoke the School's disciplinary procedure in the case of false, malicious, vexatious or frivolous allegations. The policy seeks to reassure staff that they can raise genuine concerns without fear of reprisal, even if they turn out to be mistaken
- will provide a clear and simple procedure for raising concerns, which is widely accessible.

4. Scope of this Policy

This policy is separate from the Schools' procedures regarding grievances. Staff members should not use the Whistleblowing procedure to raise concerns or grievances about their personal circumstances, such as the way they are being treated at work. In those cases, the School's Grievance Procedure should be used, as appropriate. If you are uncertain whether something is within scope of this procedure you may seek advice from the Head or the Bursar.

This procedure is to enable members of staff, volunteers or students 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.



5. What is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing, malpractice or dangers at work. Malpractice is not easily defined. However, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of ethics, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment (negligence).

A **whistleblower** is a person who raises a genuine concern relating to suspected malpractice within the School. If you have any genuine concerns related to suspected malpractice affecting any of the Schools' activities (a whistleblowing concern), you should report it under this procedure.

If anyone feels unable to raise an issue with the School or feels that their genuine concerns are not being addressed, they may report their concerns to other whistleblowing channels, such as:

- The Chair of Governors
- Protect, an independent whistleblowing charity (helpline: 020 3117 2520, email: whistle@protect-advice.org.uk, website: <https://protect-advice.org.uk/>).
- The NSPCC whistleblowing helpline (tel: 0800 028 0285 or email: help@nspcc.org.uk).

6. Confidentiality

We hope that staff, volunteers and students will feel able to voice whistleblowing concerns openly under this procedure. However, if you wish to raise a concern confidentially, we will make every effort to keep your identity confidential. If it is necessary for anyone investigating the concern to know your identity, this will be discussed with you. It may be appropriate, in order to preserve confidentiality, that concerns are raised orally rather than in writing, although members of staff are encouraged to express their concern in writing wherever possible.

If there is evidence of criminal activity, the Police will in all cases be informed.

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should discuss this with the Head or Bursar and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are set out above.

7. Raising a Whistleblowing Concern

We hope that in many cases you will be able to raise any concerns with your line manager or Head of Department. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Head, Deputy or Bursar. Alternatively, you may feel that approaching the DSL or Deputy DSL in



accordance with the Schools' Neutral Notification (Low Level Concerns) Policy, which is a neutral act, is an appropriate way to deal with your concern in the first instance.

However, where you feel that a child could be at risk, or you feel that your line manager or Head of Department (or the DSL through the Neutral Notifications Policy) has not addressed your concern, or you prefer not to raise it with them for any reason, you are at liberty to raise a whistleblowing concern to the Headmaster & CEO of the Eltham College Family of Schools, Head of the Junior School or Head of Blackheath Prep as appropriate, a member of the SLT or the Bursar directly. If you feel unable to approach them directly, then the Chair of Governors should be the next point of contact.

A meeting will be arranged with you as soon as possible to discuss your concern. You may bring a companion (staff colleague or union representative) to any meetings under this procedure. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. You may be required to attend additional meetings in order to provide further information as the concerns raised are investigated.

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. You will be kept informed of the progress of the investigation and its likely timescale. Whenever possible and subject to third party rights, you will be informed of the resolution. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If you are not satisfied that your concern is being properly dealt with, you will have a right to raise it in confidence with the Governing Body. Alternatively, you can follow the external procedure below.

8. External Procedures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in School. In most cases you should not find it necessary to alert anyone externally.

However, where all internal procedures have been exhausted, a member of staff, volunteer or student shall have a right of access to an external person/body. This may include (depending on the subject matter of the disclosure) HMRC, the Audit Commission, the Health and Safety Executive and/or the Local Authority Designated Officer (where the disclosure relates to a child protection issue).

It will very rarely, if ever, be appropriate for you to alert the media.

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff or volunteer may be entitled to raise a concern directly with an external body where the individual reasonably believes:

- that exceptionally serious circumstances justify it
- that the School would conceal or destroy the relevant evidence
- where they believe they would be victimised by the School
- where the Secretary of State has ordered it.



We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

9. Malicious Accusations

False, malicious, vexatious or frivolous accusations will be dealt with under the Schools' Disciplinary Policy and Procedure, or Sanctions Policy.

10. Protection from Reprisal or Victimisation

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken.

No one will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and follow the Whistleblowing procedures. If you believe that you have suffered any such treatment, you should inform the Head or Bursar immediately. If the matter is not remedied, staff may raise it formally using the Schools' Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.