



Allen Edwards Primary School Whistleblowing Policy & Procedures

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AND NATIONAL GUIDANCE CURRENT AUGUST 2026
ALLEN EDWARDS PRIMARY SCHOOL

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Whistleblowing Policy and Procedures

1. Introduction

1.1 Introduction

Lambeth Council (the Council) and Allen Edwards Primary School recognise that employees and others working with the School are often best placed to know when something is seriously wrong. People may hesitate to speak up because they fear being disloyal, being identified, or suffering harassment or victimisation.

Whistleblowing is the disclosure of information about suspected wrongdoing, illegal activity or serious risk in the public interest so that it can be investigated and addressed. It is not normally about a complaint concerning an individual's own employment, which should usually be raised under the appropriate HR procedure.

1.2 Policy Statement

The Council and the School are committed to the highest possible standards of openness, probity and accountability. The School encourages workers and others with serious concerns about any aspect of its work to come forward and raise them as early as possible.

This policy has been developed in accordance with the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998, the Enterprise and Regulatory Reform Act 2013 and the Employment Rights Act 2025. From 6 April 2026, sexual harassment is expressly included as a category of wrongdoing that may form the subject of a protected disclosure.

This Policy aims to:

- encourage staff to feel confident about raising concerns and to question and act on those concerns
 - provide clear internal and external routes for raising concerns
 - ensure concerns are assessed and, where appropriate, investigated
 - reassure workers that they will be protected from dismissal, detriment, harassment or victimisation for making a protected disclosure
- protect confidentiality as far as reasonably possible and lawful; and
provide appropriate feedback and a route to take the matter further if dissatisfied with the response.

2. Application and scope of the Policy

2.1 This Policy applies to employees, temporary, casual and sessional workers, agency workers, trainees, apprentices, volunteers, contractors, consultants, suppliers and those providing services to the School. Statutory protection depends on whether the individual falls within the legal definition of a worker, but the School will consider genuine public-interest concerns from anyone connected with its work.

2.2 This Policy is distinct from the School's Complaints Procedure, which enables pupils, parents, carers and members of the public to raise complaints, and from HR procedures for personal employment matters.

2.3 A concern may still be whistleblowing where it also affects the person raising it, provided they reasonably believe that the disclosure is in the public interest. The School will explain if another procedure is more appropriate and will not reject a concern merely because it was raised under the wrong procedure.

- 2.4 Safeguarding, managing allegations, grievance, disciplinary, health and safety, fraud and other procedures may also apply. Raising a concern under this Policy does not delay or replace any immediate duty to protect a child or adult at risk.
- 2.5 A worker must reasonably believe that the information disclosed tends to show that one or more of the following has happened, is happening or is likely to happen:
 - a criminal offence, including fraud, theft, bribery or corruption
 - a failure to comply with a legal obligation
 - a miscarriage of justice
 - danger to the health or safety of any person
 - damage to the environment

sexual harassment

the deliberate concealment of information tending to show any of the above
a serious safeguarding failure affecting children or adults at risk
the unauthorised, improper or wasteful use of public funds; or
serious conduct contrary to statutory guidance, financial regulations, school policies or codes of practice, where the public-interest test is met.

2.6 The list is not exhaustive as an operational guide. The statutory categories are set out in section 43B of the Employment Rights Act 1996, as amended, and an employment tribunal ultimately determines whether a disclosure is legally protected.

3. Safeguards against harassment or victimisation.

3.1 The School is committed to good practice and high standards and will support people who raise genuine concerns.

- 3.2 A worker who makes a protected disclosure has the right not to be subjected to detriment and, if an employee, not to be dismissed because of the disclosure. Protection is not lost merely because an honestly raised concern is not substantiated.
- 3.3 The School will not tolerate retaliation, harassment or victimisation. Any such conduct may be dealt with under the disciplinary procedure. Practical support and risk-reduction measures will be considered with the whistleblower.

3.4 Knowingly false allegations or deliberate abuse of the procedure may be addressed under the appropriate procedure. This does not apply where a person had a reasonable belief in the concern but was mistaken.

- 3.5 The School will keep the whistleblower's identity confidential as far as reasonably possible and lawful. Absolute confidentiality cannot be guaranteed where information must be shared to investigate fairly, protect a person, comply with the law, or enable criminal, regulatory or disciplinary proceedings. Where possible, this will be discussed first and disclosure limited to those who need to know.

4. How to Raise Your Concerns.

4.1 How to raise a concern

As a first step, raise your concern verbally or in writing with your line manager, their manager, the Headteacher or another senior leader. You do not have to follow the usual management line where you reasonably believe that doing so would be unsafe or inappropriate.

If the concern involves the Headteacher, report it to the Chair of Governors. Do not notify multiple governors, as some may need to remain independent to conduct an investigation or participate in a subsequent hearing or appeal.

Depending on the seriousness or sensitivity of the concern and who may be involved, you may also contact:

- Paul Rock, Assistant Director of Internal Audit and Counter Fraud, who is Lambeth's main point of contact for staff using the whistleblowing procedure: prock@lambeth.gov.uk or 07874 883096.
- Lambeth whistleblowing: raiseaconcern@lambeth.gov.uk.
- Lambeth Counter Fraud Team: Investigations@lambeth.gov.uk or 020 7926 1111 (fraud hotline).
- Zena Cooke, Corporate Director of Finance and Section 151 Officer: zcooke@lambeth.gov.uk or 020 7926 6943.
- A Lambeth Corporate Director, Director, Assistant Director or Head of Service.

4.2 Safeguarding concerns

Safeguarding concerns, including concerns relating to modern slavery, must be acted on urgently. If a child or adult is in immediate danger, or a crime is in progress, call 999. Where there is an immediate risk of harm, the relevant safeguarding procedures must be followed without delay.

Report any concern about a child immediately to the School's Designated Safeguarding Lead or a deputy and follow the School's Child Protection and Safeguarding Policy.

Concerns or allegations about an adult working with children, including low-level concerns, must be dealt with under the School's procedure for managing allegations against adults working with children. Concerns about the Headteacher must be reported to the Chair of Governors. The Headteacher or Chair of Governors will consult the Lambeth Local Authority Designated Officer where the statutory threshold may be met.

If a member of staff feels unable to raise a child safeguarding concern internally, or needs to report it directly, they may contact:

- Lambeth children's safeguarding: helpandprotection@lambeth.gov.uk.
- NSPCC Whistleblowing Advice Line: 0800 028 0285.

- Ofsted Whistleblowing Hotline: 0300 123 3155 or whistleblowing@ofsted.gov.uk.

Lambeth's contacts for safeguarding concerns relating to adults are:

- djennings1@lambeth.gov.uk;
- kbuck@lambeth.gov.uk; or
- Kate Buck: 020 7926 5881 for all safeguarding concerns.

Anyone with a whistleblowing concern about a local authority's children's safeguarding services or practices may contact Ofsted:

- Telephone: 0300 123 3155.
- Email: whistleblowing@ofsted.gov.uk.
- Post: Ofsted Whistleblowing Team, WBHL, Ofsted, Piccadilly Gate, Store Street, Manchester M1 2WD.

4.3 Information to provide

A concern may be raised verbally or in writing and does not need to be submitted on a particular form. Give as much information as you reasonably can, including:

- what has happened or may happen;
- when and where it happened or may happen;
- who is or may be involved;
- whether there is any immediate risk;
- why you believe the matter is in the public interest;
- what action, if any, you have already taken; and
- any evidence or relevant information that you already hold lawfully.

Do not investigate the matter yourself, attempt to obtain information unlawfully, or put yourself or anyone else at risk.

4.4 Support and representation

You may be accompanied at a meeting by a recognised trade union representative or a workplace colleague. You may also seek confidential legal or independent advice.

5. How Will the Council/School Respond?

5.1 The response will depend on the nature, urgency and risk of the concern. In all instances the School will:

5.1.1 record the concern and assess any immediate safeguarding, safety, evidence-preservation or reporting action

5.1.2 acknowledge the concern and refer it to an appropriate decision-maker within three working days, where contact details are available

5.1.3 confirm who is handling the concern, how the whistleblower can make contact and, where practicable, the next update point

- 5.1.4 assess the concern, identify conflicts of interest and decide the appropriate procedure, scope and level of independence
- 5.1.5 respect confidentiality as far as reasonably possible and lawful
- 5.1.6 keep the whistleblower informed at reasonable intervals, subject to confidentiality, data protection and the rights of others; and
- 5.1.7 provide as much information about the outcome as can lawfully be given.
- 5.2 Depending on the issue, the School may:
 - 5.2.1 request further information or evidence
 - 5.2.2 carry out a management review, audit, safeguarding enquiry, disciplinary investigation or independent investigation
 - 5.2.3 refer the matter to children's social care, the Local Authority Designated Officer, Lambeth Counter Fraud, auditors, police, a regulator or another competent body
 - 5.2.4 take corrective action, recover funds, change systems, policy or training; or
 - 5.2.5 take no further action, giving reasons where this can lawfully be explained.
- 5.3 The School will avoid unreasonable delay but cannot promise a fixed completion date. Complexity, external referrals and fairness to everyone involved may affect timing.

6. Anonymous Allegations

- 6.1 Anonymous concerns will be considered. However, they can be harder to investigate and the School may be unable to provide feedback or protect an unidentified person from detriment.
- 6.2 In deciding whether and how to proceed, the School will consider the seriousness and credibility of the concern, any safeguarding risk, the information and evidence available, and the likelihood of verification from other sources.
- 6.3 A person who wants confidentiality is encouraged to give their name and ask for it to be protected rather than reporting anonymously. The School will respect anonymity as far as possible and share identity only where necessary and lawful.

7. Rights and Responsibilities of Employees

- 7.1 Workers should raise concerns as soon as possible. They are not required to prove the allegation but must reasonably believe that the information tends to show wrongdoing and that disclosure is in the public interest.
- 7.2 Workers are expected to cooperate reasonably with an investigation, preserve evidence lawfully, maintain appropriate confidentiality and avoid making public statements that could prejudice an investigation or breach another person's rights.
- 7.3 Managers receiving concerns must act promptly, protect confidentiality, record decisions and reasons, address immediate risks and seek advice where the correct procedure or referral route is unclear.

8. Can I take the matter further if I am not satisfied?

8.1 If you believe the concern has not been addressed properly, explain why to the Headteacher or Chair of Governors, whichever is independent of the matter. The School will review whether the procedure was followed, relevant information was considered and any further action is required.

8.2 A worker may disclose to an appropriate prescribed person or body where they reasonably believe the matter falls within that body's remit and reasonably believe the information and any allegations are substantially true. The official GOV.UK list was updated on 2 June 2026:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>

Independent advice may be obtained from Protect on 020 3117 2520 or whistle@protect-advice.org.uk, a recognised trade union or a legal adviser. The National Audit Office Public Interest Disclosure line is 020 7798 7999.

8.3 Disclosures to the media or on social media are protected only in limited circumstances and may breach confidentiality or data protection duties. Seek advice before making such a disclosure.

8.4 Nothing in this policy prevents a lawful protected disclosure, reporting a crime, complying with a legal duty or making an immediate safeguarding referral. A confidentiality clause cannot lawfully prevent a protected disclosure.

9. Responsible Officer

9.1 The Headteacher is responsible for the implementation of this procedure and for maintaining a secure central record of concerns, actions, outcomes and learning. Where a concern involves the Headteacher, the Chair of Governors will maintain or arrange the record. Access will be restricted and information managed in accordance with data protection and retention requirements.

9.2 The Governing Body will receive periodic anonymised assurance about the operation and effectiveness of the procedure, without identifying individuals or prejudicing any investigation or proceedings. The Lambeth Assistant Director of Internal Audit and Counter Fraud oversees local authority counter-fraud matters and the operation of Lambeth's procedure.



Appendix 1 – Whistleblowing reporting form

WHISTLEBLOWING CONCERN

Complete the first section only. You may instead raise a concern verbally or by email. Do not delay an urgent safeguarding referral to complete this form. If the concern is about the Headteacher, report it to the Chair of Governors.

NAME OF PERSON RAISING CONCERN (optional):

DATE:

SAFE CONTACT DETAILS / TIMES:

CONFIDENTIALITY

REQUEST: YES / NO

REASON FOR CONCERN (what happened or may happen, when and where, who is involved, why it is in the public interest, and any immediate risk):



EVIDENCE AVAILABLE / PEOPLE ALREADY TOLD / ACTION ALREADY TAKEN:

Signed (optional):

ACTION TAKEN BY LINE MANAGER / HEADTEACHER / CHAIR OF GOVERNORS:

IMMEDIATE SAFEGUARDING OR SAFETY ACTION / EXTERNAL REFERRALS:

DATE ACKNOWLEDGED:

NEXT UPDATE DATE:

CONCERN RESOLVED / CLOSED: YES / NO

FURTHER ACTION / LEARNING:

Signed:

Date: