TOWERS SCHOOL

AND SIXTH FORM CENTRE

WHISTLEBLOWING POLICY

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SLT RESPONSIBILITY: Vice Principal -Tara McVey
Approved By: Board of Trustees

THE TOWERS SCHOOL & SIXTH FORM CENTRE

WHISTLEBLOWING POLICY – changes from previous versions

Audit Log		
Section of policy	**Update**	**Date**
All	No changes	July 2026

THE TOWERS SCHOOL & SIXTH FORM CENTRE

WHISTLEBLOWING POLICY

Introduction

Towers School is committed to the highest possible standards of openness, honesty, integrity and accountability. It also expects a high standard of conduct and integrity from employees. Any employee who has a concern about any aspects of the Academy's work or the actions of its employees should voice their concerns through established internal channels, without victimisation, subsequent discrimination or advantage.

Aim

This policy aims to:

• Encourage workers to feel confident in raising concerns
• Establish a fair and impartial investigative procedure
• Provide avenues for workers to raise concerns and receive appropriate feedback
• Ensure that workers receive a response to concerns and are aware of how to pursue them if they are not satisfied
• Ensure that workers will be protected from any reprisals or victimisation by the academy, provided that there is reasonable belief that the matter disclosed tends to show wrongdoing and that the disclosure has been made in an appropriate manner and in good faith

Scope

This policy applies to all employees including those working on a temporary or casual basis (including volunteers).

There are existing procedures in place to allow staff to lodge a grievance related to their own employment. This policy is intended to cover major concerns that fall outside the scope of other procedures. These include:

- Conduct which is, has been or is likely to be an offence or breach of law
- That a person has failed, is failing, or is likely to fail to comply with any legal obligation to which they are subject, for example a breach of contract; possible fraud and corruption; unauthorised use of public funds
- That a miscarriage of justice has occurred, is occurring, or is likely to occur
- That the health and safety or welfare of an individual has been, is being, or is likely to be endangered
- That the environment has been, is being or likely to be damaged
- Actions or behaviour that fall below expected standards of practice or are contrary to any of the Academy's policies
- The deliberate concealment of information relating to any of the above matters
- Other unethical conduct

Safeguards
All concerns raised will be treated in confidence and every effort will be made not to reveal the individual's identity if this is their wish. However, in certain cases, it may not be possible to maintain confidentiality if the individual is required to come forward as a witness.
This policy has been introduced in line with the Public Interest Disclosure Act 1998 to enable workers to raise issues of concern in an appropriate manner.

If an individual makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken. Towers School will not tolerate the harassment or victimisation of any worker raising a genuine concern. If, however, the individual knowingly makes a false allegation maliciously or for personal gain, disciplinary action will be taken.

Any anonymous reports must be sent in writing to the school address marked 'Private & Confidential' for the attention of 'The Chair of Trustees'. Whilst anonymous reports will be considered it will not be possible to apply all aspects of this policy for concerns raised anonymously. There are notices placed around the school with details of how employees can report any child protection concerns to the school's Designated Safeguarding Leads or anonymously to the NSPCC.

How to raise a concern

Stage 1 - Disclosure

The employee (the Representer) raising the concern should do so to their line manager unless the disclosure concerns them, in which case the employee should approach the Principal. Disclosures involving the Principal should be raised with the Chair of Trustees.

Concerns can be raised verbally or in writing. A concern raised in writing should:
- Set out the background and history of the concern, giving names, dates and places where possible.
- Give the reason why the Representer is concerned about the situation.

The earlier a concern is raised, the easier it is to take action. The Representer needs to demonstrate to the person contacted that there are sufficient grounds for concern.

If a concern is raised verbally, then the person receiving the information should put in writing an outline of the matters raised and this should be confirmed in writing to the Representer. This should be done within ten working days.

Stage 2 - Responding

The line manager has a responsibility to act on the concerns raised, in accordance with this policy. Failure to do so may lead to disciplinary action.

The school will respond to the concerns. The action taken will depend on the nature of the concerns. The matters raised may:
- Be investigated internally by the school
- Be investigated by internal audit or through the disciplinary process

- Be referred to the police
- Be referred to the external auditor
- Form the subject of an independent enquiry

Once a concern is raised, the person receiving the information should report the matter to the Principal who will appoint an appropriate investigation manager. This could be the line manager.

In order to protect individuals and the school, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures (eg child protection or discrimination issues) will normally be referred for consideration under these procedures.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

The amount of contact between the investigating manager and the Representer will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought before decisions are made about further investigation.

Where any meeting is arranged as part of the process, the Representer has the right to be accompanied by a union representative or a workplace colleague who is not involved in the area of work to which the concern relates.

Within ten working days of a concern being raised and confirmed in writing, the Representer will be written to:

- Acknowledging that the concern has been received
- Indicating how the school proposes to deal with the matter
- Giving an estimate of how long it will take to provide a final response
- Informing whether initial enquiries have been made
- Informing whether further investigations will take place and, if not, why not.
- Supplying the Representer with information on staff support mechanisms

The investigating manager will also inform any employee against whom allegations are made of the allegations. This will normally be done in writing within ten working days. However, this may be delayed if it is likely to jeopardise the investigation.

The grounds on which no further action is taken may include:
• The investigating manager is satisfied that, on the balance of probabilities, there is no evidence that malpractice has occurred, is occurring or is likely to occur;
• The investigating manager is satisfied that the Representer is not acting in good faith;
• The matter is already (or has been) the subject of proceedings under one of the school's other procedures or policies;

• The matter concerned is already the subject of legal proceedings, or has already been referred to the police, the external auditors, or other public authority.

Stage 3 - Internal investigation

Any internal investigation should take no longer than three months to complete from the date of receipt of original disclosure. As part of the investigation, the investigating manager will decide:

- Whether disciplinary action be taken against any employee
- Whether changes should be recommended to any Academy policy or procedure
- Whether any other action should be recommended

The investigating manager will send a copy of the final report, including recommendations to the Principal who will consider the recommendations and determine what action, if any, to take, The investigating manager will give a response in writing to the Representer as soon as possible after the completion of the investigation. This response will include the outcome of the investigation and what action, if any, is to be taken, although precise details may not be given where there are legal constraints, or it would infringe a duty of confidence or where there are business reasons for not doing so.

The Responsible Officer

The Principal has overall responsibility for the maintenance and operation of this policy and will maintain a record of any concerns raised and the outcomes and will report as necessary to the Chair of Trustees.

Should it be alleged that the Principal is involved in the concern, then the Chair of Trustees will act as the Responsible Officer.

How the matter can be taken further

An employee who raises a concern and is not satisfied with the outcome may appeal against the decision to the Principal. An appeal should be made within five days of receipt of the outcome letter. The Principal will determine who should hear the appeal which should be completed within one month.

An employee who is subject to action arising from a whistleblowing disclosure will be able to make representations, within five working days, to the Principal about the outcome of the report. The Principal will consider these representations and may direct further investigation or review as appropriate.

This policy is intended to provide employees with an avenue to raise concerns within the school. If the Representer is not satisfied with any action taken, the Representer may at any time disclose the matter on a confidential basis to a solicitor for the purpose of taking legal advice. Whistle blowing to an external body without first going through the internal procedure is inadvisable without compelling reasons. Compelling reasons could be the involvement of the senior managers, serious health and safety issues or possible discrimination. The external bodies which could be used are:

- Kent County Council member
- Audit Commision
- Citizens Advice Bureau

- Relevant professional bodies
- Trade Union
- Health and Safety Executive
- Police

If you do not feel able to raise your concern in the ways outlined above, you should consult the Public Interest Disclosure Act for information about other routes by which a disclosure may be made.

The academy does not tolerate reprisals, victimisation or discrimination and will take all reasonable action to protect any employee who raises a concern via the Whistleblowing procedure.

APPENDIX 1

The role of the investigating manager

The investigating manager will have the following responsibilities to the Academy:

- Arrange individual interviews with relevant witnesses or individuals and inform them of their right to be accompanied at the meeting by their trade union representative or work colleague .
- Establish the facts/obtain statements/collect documentary evidence
- Maintain detailed records of the investigation process
- Make any recommendations for action to be submitted to a more senior manager

The investigating manager will have the following responsibilities towards the employee who raised the disclosure:

- Hold a formal meeting with the employee making the complaint to discuss the matter
- Inform them of their right to be accompanied at any interview by their trade union representative or work colleague
- Keep the employee up to date with progress on the matter and agree timescales for action
- Notify the employee making the disclosure about the outcome of the investigation, including how the matter will be dealt with and whether they will be required to attend an investigatory interview
- Give details of employee support mechanisms available

The investigating manager will have the following responsibilities towards the employee against whom the disclosure is raised:

- Inform the individual/individuals about whom the disclosure is made in writing of the disclosure, the seriousness of the allegations and provide any supporting evidence
- Advise in writing of the procedure to be followed
- Give the person the opportunity to respond in person and in writing to the claims made, and receive and consider any relevant evidence
- Inform them of their right to be accompanied at any interview by a trade union representative or work colleague
- Give details of employee support mechanisms available
- The investigating manager may also be required to act as a witness at any subsequent disciplinary hearing if required
- Where necessary The Academy will provide support, counselling or mediation to any team subject to investigation in order to ensure normal working relationships are resumed as effectively as possible