KINGS PARK SCHOOL

WHISTLEBLOWING POLICY

POLICY NO.	KPS-WBP-004
POLICY OWNER	HEADTEACHER
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	SIGNED	DATE
HEADTEACHER MISS S J WATSON		**01/09/2025**
PROPRIETOR MRS AMY SAUNDERS		**01/09/2025**
CHAIR OF GOVERNORS MR ALEX RICHARDS		

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1.0 INTRODUCTION

Kings Park School is an independent specialist provision, offering support and education for children and young people from ages 7-16 with various individual needs. Each child and young person's support is guided by their Education, Health and Care Plan (EHCP), which outlines the provision required to meet their individual needs. With spacious, light-filled classrooms and a highly skilled team of specialist SEN staff, our school provides a calm and supportive environment where children and young people are empowered to move beyond past challenges.

Each learner follows a personalised timetable tailored to their individual needs and interests, with clear, achievable targets that promote motivation, confidence, and progress. In addition to the statutory annual review process, we conduct a broad range of formal and informal assessments throughout the year to monitor progress and adapt provision where necessary.

Classes are small with up to 8 pupils, depending on the individual needs. Each class is led by a teacher and supported by a dedicated teaching assistant, with additional teaching assistants provided where necessary and stated on the child's EHCP. Children and young people will be placed in a class based on suitability rather than age. Our nurture-based approach ensures that emotional wellbeing is prioritised alongside learning, and our classrooms are designed to be sensory-friendly, providing calm, supportive environments that help students feel safe, regulated, and ready to engage.

At Kings Park School (KPS), we place the safety, well-being, and development of our students at the heart of everything we do. We are committed to providing a safe, inclusive, and aspirational learning environment for children and young people with a range of neurodivergent profiles and social, emotional and mental health needs.

2.0 LEGAL FRAMEWORK AND GUIDANCE

This policy is compliant with the Education (Independent School Standards) Regulations 2014 and supports best practices in safeguarding, governance, and school improvement.

Education (Independent School Standards) Regulations 2014
Public Interest Disclosure Act 1998
Employment Rights Act 1996

DfE (2025) Keeping Children Safe in Education
DfE (2023) Working Together to Safeguard Children
ESFA (2024) Whistleblowing and Complaints Guidance
Ofsted (2024) Whistleblowing to Ofsted about Children's Social Care and Education Providers
Sir Robert Francis (2015) Freedom to Speak Up Report

The Public Interest Disclosure Act 1998 (PIDA) is a UK law designed to protect workers who "blow the whistle" on wrongdoing in their workplace. It ensures that employees can raise concerns about issues such as criminal activity, health and safety risks, environmental damage, or breaches of legal obligations without fear of dismissal or victimisation. For a disclosure to be protected, it must be made in the public interest and follow the appropriate channels, such as reporting to the employer or a relevant regulatory body. PIDA encourages transparency and accountability while offering legal protection to those who speak up in good faith. The details of any disclosure will remain confidential. The **HEADTEACHER** is the first point of contact for whistleblowing queries. If the allegation is related to the headteacher, the concern will be raised with The Chair of Governors**.**

3.0 PURPOSE OF THIS POLICY

At Kings Park School, we are committed to maintaining the highest standards of honesty, safety, and accountability. We believe that creating a culture of openness, where every voice is valued and concerns can be raised without fear is essential to keeping our community safe and strong.

We take all whistleblowing matters seriously. If a team member sees something that causes concern, we want them to feel confident and supported to speak up. Raising a concern should be seen as a positive and responsible act. It shows care for the school, our pupils, and our values.

This policy outlines how staff and others connected to the school can raise concerns about any activity or conduct that seems illegal, unsafe, unethical, or not in line with our school's standards. It explains how we will respond and reassures those who raise concerns in good faith that they will be protected from any form of retaliation or victimisation under the Public Interest Disclosure Act (PIDA).

This policy is distinct from our procedures on staff grievances, disciplinary matters, or harassment as those are managed separately. When whistleblowing involves personal or sensitive information, it will always be handled in line with our Data Protection Policy.

This policy aims to:

- Empower staff to speak up if they witness behaviour or practices that seem wrong, unsafe, or dishonest.
- Provide clear, safe ways to report concerns.
- Ensure concerns are taken seriously, responded to appropriately, and that feedback is given wherever possible.
- Protect individuals from any negative consequences when concerns are raised in good faith.

Who can raise a concern under this policy:

- Employees of the school.
- Volunteers working with the school.
- Student teachers and other trainees on placement.

At KPS, speaking up is a sign of integrity and care. We are committed to listening, responding, and doing what's right for our pupils, our staff, and our school community.

This policy should be read alongside the school's Safeguarding and Child Protection Policy, which outlines additional whistleblowing routes for safeguarding matters.

4.0 OUR ETHOS AND VALUES

We are guided by our school motto: ***"Inspiring Dreams, Building Bright Futures Together."*** Our core values are:

- ***Kind Words***: We speak with empathy and understanding.
- ***Positive Minds***: We approach challenges with optimism and resilience.
- ***Strong Hearts***: We show courage, compassion and strength in our relationships.

These values are more than aspirations - they are embedded in every interaction, decision, and environment within Kings Park School.
Kind Words reflect our belief in the power of language to heal, uplift, and include. Whether it is peer encouragement, staff guidance or family communication, we model respectful, thoughtful speech in all we do.
Positive Minds encourage our students and staff to reframe difficulties as opportunities to learn and grow. We promote a strengths-based approach that focuses on what each individual child can do and how they can build confidence through success.
Strong Hearts remind us of the importance of compassion, resilience and relationships. We teach students to persist through challenges, support others, and show bravery in being true to themselves.
Together, these values underpin our approach to behaviour, learning, and building a safe, inclusive school community.

5.0 DEFINITIONS

Whistleblowing is when a member of staff reports suspected wrongdoing, or 'qualifying disclosures,' at work to their employer. As outlined by the PIDA, qualifying disclosures pertain to when any of the following takes place:

- A criminal offence has been committed, is likely to be committed or is being committed.
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject.
- A miscarriage of justice has occurred, is occurring or is likely to occur.
- The health or safety of any individual has been, is being or is likely to be endangered.
- The environment has been, is being or is likely to be damaged.
- Information tending to show any matter falling within any of the preceding points has been, is being or is likely to be deliberately concealed.

In the public interests means that an individual acted outside of their own personal interest – they acted for more than personal gain. It is not necessary for the disclosure to be of interest to the entire public. The following considerations are often used as a test to establish whether something is within the scope of public interest:

- The number of people in the group whose interests the disclosure served.
- The nature of the interests and the extent by which individuals are affected by the wrongdoing disclosed.
- The nature of the wrongdoing disclosed.
- The identity of the alleged wrongdoer

Blacklisting refers to an individual who is being refused work because they are viewed as a whistleblower.

Grievances involve someone filing a complaint because they personally have been mistreated in some way – the person making the complaint will have a direct interest in the outcome.

It is important to understand the difference between raising a grievance and blowing the whistle.

6.0 ROLES AND RESPONSIBILITIES

Kings Park School Proprietor will be responsible for:

- Establishing and agreeing the whistleblowing procedure.
- Ensuring the agreed whistleblowing procedure is published on the school's website.
- Monitoring the effectiveness of this policy and undertaking any necessary reviews, e.g. in relation to good practice recommendations or changes in legislation.
- Ensuring all members of the school community have access to this policy.
- Investigating, in liaison with the headteacher, any concerns that are raised.
- Ensuring this policy provides an open and transparent framework where employees of the school can raise their concerns.
- Taking the necessary action against members of staff following an investigation into any alleged malpractice.
- Ensuring that the minutes of the governing board include a record of the school's whistleblowing arrangements and who, both internally and externally, staff members should report concerns to.
- Informing staff members which member of the board of proprietors they should be reporting their concerns to.

The headteacher will be responsible for:

- Ensuring all members of staff have read and understood this policy.
- Receiving, investigating and responding to any concerns that have been raised by staff.
- Being the first point of contact regarding whistleblowing.

The allocated Complaints Lead on the board of governors will be responsible for receiving any concerns raised about the headteacher.

All members of staff will be responsible for:

- Raising any concerns that meet the definitions of this policy.
- Being truthful and reasonable with any concerns that they have.
- Not raising malicious or unfounded concerns.
- Additional support needed by complainants; for example, interpretation support or where the complainant is a child or young person.

7.0 HARRASSMENT AND VICTIMISATION OF STAFF

At Kings Park School, we understand that raising a concern can feel daunting. We recognise the courage it takes to speak up, particularly when there may be fears of retaliation or being treated differently. We are fully committed to creating a culture where staff feel safe, supported, and protected when doing the right thing.

We will not tolerate any form of harassment, victimisation, or unfair treatment towards anyone who raises a concern in good faith. If such behaviour does occur, it will be taken seriously and addressed in line with our Disciplinary Policy.

Staff are legally protected under the **Public Interest Disclosure Act 1998 (PIDA)**. This means that, as long as the concern is raised in the public interest and meets the criteria of a "protected disclosure," the individual is safeguarded from dismissal or other detriment. The school will always uphold these protections and take swift action if they are breached.

Raising concerns is a responsible act and one that helps strengthen our school community. We are here to listen, to act appropriately, and to support those who come forward.

8.0 NON-EMPLOYEES

While the Public Interest Disclosure Act 1998 (PIDA) and the Employment Rights Act 1996 offer legal protection to employees, they do not extend these protections to non-employees such as volunteers, visitors, or governors. However, at Kings Park School, we hold ourselves to a higher standard of care.

We are committed to ensuring that *anyone* who raises a genuine concern whether they are employed by the school or not, is treated with respect and fairness. We will not tolerate harassment, exclusion, or any other negative treatment towards non-employees who act in good faith to raise a safeguarding, safety, or integrity concern.

If a non-employee feels they have been treated unfairly after raising a concern, they are encouraged to use our **Complaints Procedures Policy** to seek resolution.

Although governors are not protected under PIDA, they play a key role in ensuring that the school has a clear and effective whistleblowing procedure in place. We expect all members of the school community to uphold the values of transparency, accountability, and safety for all.

9.0 GOOD PRACTISE PRINCIPLES

At Kings Park School, we are committed to embedding the core principles of the *Freedom to Speak Up* report into our everyday practice. We believe that creating an environment where concerns can be raised openly and confidently is essential to safeguarding, integrity, and continuous improvement.

Our whistleblowing approach is grounded in fairness, clarity, and consistency. More than a policy, it reflects our school's culture—one that protects, values, and listens to every voice in our community.

We are building a culture of:

- **Safety** – where pupils and staff feel secure and protected.
- **Confidence** – where individuals know they can raise concerns without fear.
- **Respect** – where bullying, intimidation, or retaliation are never tolerated.
- **Visible Leadership** – where leaders model openness, accountability, and support.
- **Staff Value** – where every team member feels recognised and heard.
- **Reflection** – where we learn from experience to strengthen practice and outcomes.

These principles guide how we respond to whistleblowing and how we foster trust across our school. Speaking up at KPS is encouraged, supported, and valued.

Our procedure includes:

- Clear guidance on how to raise and report concerns.
- A transparent process for how concerns will be investigated.
- A fair and balanced approach to resolving disputes or misunderstandings through appropriate mediation and support.

We are also committed to embedding good practice in everything we do. To support this, we ensure:

- Staff receive relevant and regular training on whistleblowing and safeguarding.
- Staff are supported emotionally and professionally throughout the process.
- Those seeking alternative employment during or after raising concerns are treated with sensitivity and fairness.
- The school remains open, transparent, and accountable at every stage.
- Independent, external reviews are arranged when necessary.
- Any regulatory requirements are followed swiftly and appropriately.

Support for Vulnerable Groups

We recognise that some individuals may feel more vulnerable when raising concerns. Kings Park School takes extra care to ensure that everyone feels safe and empowered to speak up, regardless of their role or background. We commit to:

- Ensuring non-permanent and agency staff receive the same training and guidance as permanent staff.
- Applying all safeguarding and whistleblowing principles equally to trainees and student teachers.
- Being mindful of the additional pressures that staff from ethnic minority backgrounds may experience and offering tailored support where needed.
- Promoting an inclusive environment where all staff feel protected, confident, and free to raise concerns without fear of judgement or reprisal.

10.0 PROCEDURE

When raising concerns, individuals will express them in writing to the headteacher. If an individual is raising a concern about the headteacher, they should express their concerns in writing to the complaints lead – board of governors. Where this is the case, The Complaints Lead will take on the headteacher's duties outlined in this policy.

When individuals raise their concern, they will include the following information as far as possible:

- The background and history of the concern
- Any relevant names, dates and places
- The reasons for the concern

The school encourages individuals to let their identity be known when they raise concerns, as anonymous concerns can be challenging to investigate.

Individuals who would like to seek professional and confidential advice should contact Protect, a registered charity that advises on whistleblowing queries. The Protect website can be accessed at www.protect-advice.org.uk, or they can be contacted on 020 31172520.

Once an individual has raised a concern, the school will be responsible for investigating. In certain instances, it may be appropriate for the individual to raise the concern with an outside agency, e.g. the police, depending on the severity of the concern. Equally, it may be appropriate for the individual to request that their trade union raises the matter.

All whistleblowing will be kept confidential and retained securely in line with the school's Data Protection and Records Retention Policy for a period of six years.

If a member of staff feels they should report a concern to the ESFA, they should use the online contact form.

If a member of staff feels like they are unable to raise a safeguarding-related concern with the school, they can contact:

- The NSPCC Whistleblowing Helpline on 0800 028 0285.
- The LADO. 03000 010 448
- Ofsted - 0300 123 3155 or whistleblowing@ofsted.gov.uk

- Department for Education via the secure online whistleblowing form.

The school, or the appropriate external agency, will acknowledge receipt of a disclosure but, unless additional information is required, will not contact or engage in dialogue with the whistleblower, as this may undermine the legitimacy of the investigation outcome.

11.0 NEXT STEPS

The Complaints Lead will write to the individual within **10 working days** of the initial meeting to confirm that the concern has been received, as well as to indicate proposals for dealing with the matter. The initial stage will be an interview with the whistleblower, and then an assessment of further action will be discussed. During this initial stage, the headteacher will establish if:

- There are grounds for a concern and that it is genuine.
- The concern was raised in accordance with this policy.

During the initial interview, the headteacher will request the individual puts their concern in writing, if they have not already done so. The headteacher will write a summary of the concern if the individual is unable to put it in writing.

The Chair of Governors will explain the following to anybody raising a concern:

- How they will communicate with the complainant throughout the process.
- It should be noted, the need for confidentiality may prevent the school giving the complainant specific details of any necessary investigation or any necessary disciplinary action taken because of the concern.
- That the complainant's identity will be kept confidential from the other party.
- That the governing board will do everything in its power to protect the complainant from discrimination.
- That if the concern is genuine, even if the concern is not confirmed, no disciplinary action will be taken against the complainant.

If clear evidence is uncovered that the complainant's concern is malicious or unfounded, disciplinary action may be brought against them.

If an investigation is conducted, the whistleblower will be informed of the final outcome.

A record will be kept of the seriousness of the issues raised and the credibility of the concern. All records will be kept confidential and will be stored in line with the school's Records Management Policy.

It may be possible for the concern to be resolved by simply agreeing the necessary action or explaining procedures to the other party; however, depending on the severity and nature of the concern, it may:

- Be investigated by management, an internal audit or through the disciplinary process.
- Be referred to the police or an external auditor.
- Form the subject of an independent inquiry.

If the investigating officer needs to talk to the whistleblower, they are permitted to be accompanied by a trade union representative, a professional association representative, a friend or a fellow member of staff not involved in the area of work that the concern relates to. This person will provide support only and will not be allowed to become involved in the proceedings.

A record will be made of the nature and outcome of the concern. The purpose of this is to ensure that a central record is kept which can be cross-referenced with other complaints to monitor any patterns of concern across the school and to assist in monitoring the procedure.

The whistleblower will be informed of the results of the investigation, and any action that is proposed will be subject to third party rights. Where action is not taken, the individual will be given an explanation.

12.0. WHAT THE SCHOOL ASKS OF WHISTLEBLOWERS

The purpose of this policy is to enable individuals to raise concerns in confidence, without any fear of reprisal; therefore, it is imperative that whistleblowers:

- Do not talk about the concern outside the school unless it is to report the concern through the proper external channels, e.g. the DFE.
- Declare any personal interest in the matter, as the policy is designed to be used in the interest of the public and not for individual matters.

13.0. APPEAL PROCESS

If no action is to be taken and/or the individual is not satisfied with the way the matter has been handled, they can make a complaint under the school's Complaints Procedure Policy.

14.0. UNFAIR TREATMENT

An individual can take a case to an employment tribunal if they feel that they have been treated unfairly because of whistleblowing.

Further information can be sought from the Citizen's Advice Bureau, the whistleblowing charity Protect, or from an individual's trade union. Any claims of unfair dismissal needs be made within three months of the investigation ending.

This policy will be reviewed by the Senior Leaders every year. At every review, the policy will be approved by The Chair of Governors.

APPENDIX: A – WHISTLEBLOWING FLOWCHART

KPS WISTLEBLOWING PROCEDURE

RAISING CONCERNS

THE INDIVIDUAL REPORTS THE FOLLOWING TO THE HEADTEACHER -
THE BACKGROUND AND HISTORY OF THE CONCERN
ANY RELEVANT NAMES, DATES AND PLACES
THE REASONS FOR THE CONCERN

WHEN THE COMPLAINT IS ABOUT THE HEADTEACHER IT SHOULD BE DIRECTED TO THE CHAIR OF GOVERNORS WHO WILL TAKE ON THE ROLE OF THE HEADTEACHER IN THIS PROCESS

INDIVIDUALS WHO WOULD LIKE TO SEEK PROFESSIONAL AND CONFIDENTIAL ADVICE SHOULD CONTACT PROTECT, A REGISTERED CHARITY THAT ADVISES ON WHISTLEBLOWING QUERIES.

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THE HEADTEACHER WILL BE RESPONSIBLE FOR INVESTIGATING THE CONCERN.
THE SCHOOL, OR THE APPROPRIATE EXTERNAL AGENCY, WILL ACKNOWLEDGE RECEIPT OF A DISCLOSURE BUT, UNLESS ADDITIONAL INFORMATION IS REQUIRED, WILL NOT CONTACT OR ENGAGE IN DIALOGUE WITH THE WHISTLEBLOWER, AS THIS MAY UNDERMINE THE LEGITIMACY OF THE INVESTIGATION OUTCOME

IF A MEMBER OF STAFF FEELS THEY SHOULD REPORT A CONCERN TO THE ESFA, THEY SHOULD USE THE ONLINE CONTACT FORM.
IF A MEMBER OF STAFF FEELS LIKE THEY ARE UNABLE TO RAISE A SAFEGUARDING-RELATED CONCERN WITH THE SCHOOL, THEY CAN CONTACT THE NSPCC WHISTLEBLOWING HELPLINE ON 0800 028 0285 OR THE LADO.

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THE CHAIR OF GOVERNORS WILL WRITE TO THE INDIVIDUAL WITHIN 10 WORKING DAYS OF THE INITIAL MEETING TO CONFIRM THAT THE CONCERN HAS BEEN RECEIVED, AS WELL AS TO INDICATE PROPOSALS FOR DEALING WITH THE MATTER.

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INITIAL STAGE - INTERVIEW WITH THE WHISTLEBLOWER
TO ESTABLISH IF - THERE ARE GROUNDS FOR A CONCERN, THAT IT IS GENUINE AND THE CONCERN WAS RAISED IN ACCORDANCE WITH THIS POLICY. RECORD KEPT IN LINE WITH POLICY.

IF FOUND TO BE MALICIOUS OR UNTRUE THE WHISTLEBLOWER WILL FACE DISCIPLINARY ACTION WHERE SUITABLE.

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THE ISSUE MAY BE RESOLVED BY EXPLAINING PROCEDURES/TRAINING OR DISCUSSING WITH THE OTHER PARTY BUT IT MAY-
BE INVESTIGATED BY MANAGEMENT, AN INTERNAL AUDIT OR THROUGH THE DISCIPLINARY PROCESS.
BE REFERRED TO THE POLICE OR AN EXTERNAL AUDITOR.
FORM THE SUBJECT OF AN INDEPENDENT INQUIRY.

WHERE AN INVESTIGATOR NEEDS TO SPEAK WITH THE WHISTLEBLOWER THEY ARE PERMITTED TO BRING SUPPORT OR UNION REP.

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THE WHISTLEBLOWER WILL BE INFORMED OF THE RESULTS OF THE INVESTIGATION, AND ANY ACTION THAT IS PROPOSED WILL BE SUBJECT TO THIRD PARTY RIGHTS.

WHERE ACTION IS NOT TAKEN, THE INDIVIDUAL WILL BE GIVEN AN EXPLANATION.