Policy Name	Whistleblowing Policy				
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Author	Head of School				

Version History				
Version	**Approved by**	**Revision Date**	**Details of Changes**	**Author**
1.2		**25.8.26**	**Significant changes to wording to improve clarity**	**MT**

This policy will be reviewed in full by the Advisory Board and the Head of School on an annual basis, and sooner where legislation, regulatory requirements, organisational arrangements or relevant guidance change.

1. Introduction and purpose

All organisations face the risk of things going wrong or of unknowingly harbouring malpractice. In Globeducate schools, we encourage staff and members of the school community to raise worries or concerns. With this in mind, it is important that all members of our community are aware that:

This policy provides a clear and confidential route for raising concerns about serious wrongdoing, malpractice or risks that may affect the school community or the wider public interest. It is intended to promote openness, accountability and early identification of concerns, while protecting people who raise genuine concerns from retaliation or victimisation.

The school will take concerns seriously and will deal with them fairly, consistently and, where appropriate, promptly.

2. Key Principles

- All genuine concerns about malpractice, wrongdoing or serious risks will be taken seriously and assessed appropriately.
- Anyone raising a concern in good faith, and any worker making a protected disclosure within the meaning of applicable law, will be protected from retaliation, victimisation or other detrimental treatment because they raised the concern.
- The school will respect confidentiality as far as reasonably practicable and will only share information with those who need it for the purposes of assessing, investigating or addressing the concern, or where disclosure is required or permitted by law.
- A person may raise a concern outside their normal line-management structure where they are uncomfortable doing so, where the concern involves their line manager, or where they reasonably believe that an alternative route is more appropriate.
- A concern that is ultimately not substantiated will not, by itself, be treated as a malicious or false allegation.
- Knowingly false, deliberately misleading or malicious allegations may be dealt with under the school's disciplinary or other appropriate procedures.

- No person should be disadvantaged because they have raised a concern in good faith.

3. What is whistleblowing?

A whistleblower is generally a worker who reports information about wrongdoing in the public interest. In Great Britain, whistleblowing protection is provided by the Employment Rights Act 1996, subject to the statutory conditions applying to a protected disclosure.

For a disclosure to qualify for statutory whistleblowing protection, the worker must generally reasonably believe that the information tends to show certain types of wrongdoing and that making the disclosure is in the public interest. The wrongdoing can include:

- a criminal offence, including fraud or other financial crime;
- a breach of a legal obligation;
- a miscarriage of justice;
- a danger to the health or safety of any individual;
- damage to the environment;
- sexual harassment; or
- the deliberate concealment of information tending to show any of the above.

The school may also use this policy to receive and assess other serious concerns raised by members of the school community, even where statutory whistleblowing protection does not apply. Students, parents/carers, volunteers and other members of the school community should be directed to the most appropriate school procedure for their concern.

4. Examples of concerns

Examples may include:

- financial fraud, theft, financial malpractice or other corruption;
- attempts to conceal or cover up wrongdoing;
- serious breaches of legal, regulatory or professional obligations;
- serious or systemic risks to the health and safety of pupils, staff or others;
- serious safeguarding concerns, which must be dealt with in accordance with the Safeguarding Policy;
- serious failures in standards of education or service where these may involve wrongdoing, illegality, significant risk or wider public interest concerns;
- serious conflicts of interest or abuse of position;
- sexual harassment, bullying, harassment or victimisation where the concern involves serious wrongdoing or is otherwise appropriate to this policy; and
- damage to the environment or other serious misconduct affecting the wider school community.

5. Matters that are normally dealt with under other procedures

Whistleblowing is different from a personal grievance or complaint about an individual's own employment situation. Personal matters such as pay, workload, promotion, performance management or an individual employment dispute should normally be raised through the school's grievance or other appropriate procedure.

However, the school will consider the substance of a concern rather than simply the label given to it. A matter described as a grievance may also contain information that raises a genuine public-interest whistleblowing concern. Where this occurs, the school will determine the appropriate procedure or whether more than one procedure should apply.

6. Who can raise a concern?

The school encourages staff and members of the wider school community to raise concerns. Employees and other workers should be aware that specific legal protections may apply to them where the statutory requirements for whistleblowing are met.

Students and other members of the school community can also raise concerns through the school's appropriate reporting channels. The school will take such concerns seriously and will seek to protect them from inappropriate retaliation or victimisation.

7. How to raise a concern

The preferred internal route for staff is normally through their line manager. However, a concern may instead be raised with the Head of School or another appropriate member of the School Leadership Team, particularly where:

- the concern involves the line manager;
- the individual does not feel comfortable raising the matter through their normal reporting line;
- there is a conflict of interest; or
- the individual reasonably believes that another route is more appropriate.

A person may ask a trusted colleague or other appropriate person to assist them in raising or communicating a concern. The school will not require a concern to be raised only through the normal line-management structure.

8. Concerns involving the Head of School or senior leadership

If a concern involves the Head of School, or if the person raising the concern reasonably believes that the Head of School cannot deal with the matter impartially, the concern should be escalated outside the normal school management structure.

In such cases, the school currently identifies Daniel Jones, Chief Education Officer,

as an escalation contact: daniel.jones@globeducate.com. The school should ensure that this contact is reviewed whenever the relevant role-holder changes.

9. Safeguarding and child protection

In any case involving child protection or safeguarding, it is vital that the procedure laid down in the Safeguarding Policy is followed and advice is sought from the Designated Safeguarding Lead (DSL).

Where a concern also has whistleblowing characteristics, the school will ensure that the safeguarding process and any whistleblowing process are coordinated appropriately. Safeguarding considerations will take priority where necessary to protect a child or vulnerable person.

10. Confidentiality and anonymity

The school will make every reasonable effort to protect the identity of a person who raises a concern confidentially. Information will only be shared with people who need to know in order to assess, investigate or respond to the concern, or where disclosure is required or permitted by law.

A person may ask to raise a concern anonymously. The school will consider anonymous concerns seriously; however, anonymity may make it more difficult to investigate the matter, obtain clarification, provide feedback or protect the individual from possible detriment.

Where the school believes that a person's identity may need to be disclosed, the school will, where reasonably practicable and legally permissible, discuss this with the person in advance. There may be circumstances where disclosure is necessary without prior consent, including safeguarding, legal or regulatory requirements.

11. Protection from retaliation and victimisation

The school will support people who raise genuine concerns and will not tolerate retaliation, victimisation, bullying, harassment or other detrimental treatment because a person has raised a concern in good faith or made a protected disclosure where applicable.

Any attempt to discourage, threaten, victimise or otherwise penalise someone for raising a genuine concern may be treated as a disciplinary matter and may result in appropriate action.

Anyone who believes they have experienced retaliation after raising a concern should report this promptly to the Head of School, another member of the School Leadership Team, or the appropriate escalation contact where the concern involves the Head of School.

12. Dealing with concerns and investigations

Anyone raising a concern needs to be aware that the school may need to investigate the matter. The school will seek to treat fairly both the person raising the concern and any person who may be the subject of the concern.

- The concern will be acknowledged where contact details are available.
- The school will conduct an initial assessment to determine the appropriate procedure, level of urgency and whether any immediate protective action is required.
- An appropriate and sufficiently independent person will be appointed to investigate or oversee the investigation, taking account of any actual or potential conflict of interest.
- The investigation will be conducted as fairly and proportionately as possible, taking account of relevant evidence and the need to maintain confidentiality.
- Where appropriate, the person who raised the concern will be given an indication of the outcome and/or action taken, subject to legal, safeguarding, confidentiality and data-protection considerations.
- Where a concern is not substantiated, this will not in itself mean that the person raising it acted improperly.

The school will aim to acknowledge concerns promptly and provide updates where appropriate. The precise timescale will depend on the nature and complexity of the concern.

13. Malicious or knowingly false allegations

The school recognises that concerns may be raised in good faith and may ultimately prove to be unfounded. No disciplinary or other adverse action will be taken simply because a concern is not substantiated.

However, deliberately and knowingly making a false or malicious allegation, or deliberately providing misleading information, may constitute misconduct and may result in action under the school's relevant procedures.

14. External reporting

The school encourages concerns to be raised internally where this is appropriate and safe. However, workers should be aware that UK whistleblowing law may protect certain disclosures made to prescribed persons or bodies where the relevant statutory requirements are met.

Workers should obtain appropriate independent advice if they are considering making an external disclosure and are unsure which organisation is appropriate. The current GOV.UK list of prescribed persons and bodies should be consulted to identify the appropriate regulator or authority for the subject matter of the concern.

The school will not seek to prevent a worker from exercising any statutory right to make a protected disclosure. Nothing in this policy is intended to restrict or discourage lawful whistleblowing.

15. Records and data protection

Records of concerns raised under this policy will be handled securely and in accordance with the school's data-protection obligations and relevant retention requirements. Access will be restricted to those who need the information for legitimate purposes.

The school will maintain appropriate records of concerns, actions and outcomes so that it can monitor the effectiveness of this policy, identify recurring issues and demonstrate appropriate governance, while maintaining confidentiality and complying with data-protection requirements.

16. Roles and responsibilities

- All staff and members of the school community: raise genuine concerns promptly and provide information honestly and appropriately.
- Line managers and School Leadership Team members: listen to concerns, avoid retaliation, preserve confidentiality and escalate concerns where appropriate.
- Head of School: ensure that concerns are dealt with appropriately and that the policy is implemented effectively.
- Advisory Board: provide appropriate oversight, review the operation of the policy and ensure that significant concerns are escalated appropriately.
- Designated Safeguarding Lead: manage safeguarding and child-protection concerns in accordance with the Safeguarding Policy.
- Policy owner(s): monitor legal and regulatory developments and ensure that the policy is reviewed and updated when required.

17. Review of the policy

This policy will be reviewed in full by the Advisory Board and the Head of School at least annually, or sooner where there are changes to legislation, regulatory requirements, organisational arrangements, relevant guidance or lessons arising from the operation of the policy.

18. Important note

This policy is intended to provide a practical framework for raising concerns and should be read alongside the school's Safeguarding Policy, Staff Code of Conduct, Grievance Policy, Disciplinary Policy, Equality and other relevant policies. It should not be interpreted as providing or limiting any statutory employment rights.

18. Legal/guidance

The legal framing above has been checked against current GOV.UK whistleblowing guidance available in August 2026, including guidance on protected disclosures, public interest, confidentiality/anonymity and prescribed persons.

Sources:

GOV.UK – Whistleblowing guidance for employers

GOV.UK – Whistleblowing for employees

GOV.UK – Whistleblowing: list of prescribed people and bodies.