



**RUGBY SCHOOL
GROUP**

Rugby School Group Whistleblowing Policy

September 2026

INTRODUCTION

Rugby School Group is committed to conducting its activities with honesty, integrity and accountability and to maintaining a culture in which staff feel able to speak openly about serious concerns.

The Group recognises that staff are often the first to become aware of wrongdoing or unsafe practice. Raising concerns promptly allows the Group to investigate them, address problems and reduce the risk of harm.

The Group encourages anyone with a genuine concern about wrongdoing to speak up. Concerns raised under this policy will be taken seriously and handled fairly. No person will suffer retaliation or detrimental treatment because they have raised a concern which they reasonably believe to be in the public interest.

SCOPE

This policy applies across Rugby School Group, including its UK Schools and other entities.

The policy may be used by employees and workers and the Group also encourages governors, volunteers, contractors, consultants, agency workers and others working with the Group to raise concerns about wrongdoing through the arrangements set out in this policy.

Whistleblowing is concerned with wrongdoing which affects others or is otherwise in the public interest. It is different from a personal complaint about an individual's own employment or treatment at work. Personal employment concerns should normally be raised under the Group's Grievance Policy.

Where a concern includes both a personal grievance and a wider public interest concern, the Group may consider the issues under both procedures or determine the most appropriate way of addressing them.

WHAT IS WHISTLEBLOWING?

Whistleblowing is the disclosure of information about suspected wrongdoing or dangers at work which the person raising the concern reasonably believes is in the public interest.

Under the Employment Rights Act 1996, as amended, qualifying disclosures may concern:

- a criminal offence;
- a failure to comply with a legal obligation;
- a miscarriage of justice;
- danger to the health or safety of any individual;
- damage to the environment;
- sexual harassment; or
- the deliberate concealment of information relating to any of the above.

Within the Group, concerns may therefore include, for example:

- fraud, bribery, corruption or financial malpractice;
- serious health and safety risks;

- serious breaches of legal or regulatory requirements;
- systemic or serious failures in safeguarding practice;
- serious misconduct or unethical behaviour;
- sexual harassment;
- environmental wrongdoing; or
- attempts to conceal any such matters.

The wrongdoing may have occurred in the past, be happening now or be likely to happen in the future.

A person raising a concern does not need to prove that wrongdoing has occurred or undertake their own investigation. They should raise the information or concern they have and allow the Group to consider and investigate it appropriately.

SAFEGUARDING CONCERNS

Nothing in this policy replaces or overrides the safeguarding responsibilities of staff.

Concerns about the welfare or safety of an individual child, or concerns about the conduct of a member of staff towards a child, must be reported immediately in accordance with the relevant School's Safeguarding and Child Protection Policy and the requirements of the current version of *Keeping Children Safe in Education*.

This Whistleblowing Policy should be used where a person has concerns about poor or unsafe safeguarding practice, systemic safeguarding failures, or a failure by the Group, an individual School, or its staff to fulfil their safeguarding responsibilities.

Staff who feel unable to raise a safeguarding concern internally, or believe that genuine safeguarding concerns are not being addressed, may also use the NSPCC Whistleblowing Advice Line or contact an appropriate statutory body.

RAISING A CONCERN

The Group wants staff to raise concerns as early as possible. A concern may be raised verbally or in writing.

A concern should normally be raised with the individual's line manager. However, there is no requirement to raise a concern with a line manager first.

A concern may instead be raised directly with any of the following, particularly where the person raising the concern does not feel comfortable using their normal management route:

- the Head of the relevant School;
- the Chief Operating Officer;
- the General Counsel;
- the HR Director; or
- the Head Master.

Where the concern relates to the Head Master, Chief Operating Officer or another member of the Group's senior leadership, or where the individual reasonably considers it inappropriate to use the routes above, the concern may be raised directly with the Chair of the Governing Body.

A person raising a concern should provide as much information as they reasonably can about the matter, including relevant events, dates and individuals involved. They are not expected to investigate the matter themselves or obtain evidence beyond information already legitimately available to them.

CONFIDENTIALITY AND ANONYMOUS REPORTING

The Group understands that a person raising a concern may be worried about their identity becoming known.

Where confidentiality is requested, the Group will take reasonable steps to protect the individual's identity and will disclose it only where necessary for the proper investigation of the concern, to meet a legal or regulatory obligation, or where otherwise required by law.

Where it becomes necessary to disclose the identity of the person raising the concern, the Group will normally discuss this with them beforehand where it is reasonably practicable to do so.

Concerns may be raised anonymously. Anonymous concerns will be considered on their merits and investigated where reasonably possible. However, anonymity may make it more difficult to investigate a concern fully, seek further information or provide feedback.

The Group would rather receive an anonymous concern than have a serious concern remain unreported.

HOW THE GROUP WILL RESPOND

All concerns raised under this policy will be taken seriously and considered fairly and objectively. The person receiving the concern will ensure that it is referred promptly to an appropriate person to determine how it should be considered. This report should be made as soon as practicable, and no later than within 24 hours.

Where an investigation is appropriate, the person appointed to investigate or review the concern will, so far as reasonably practicable, be sufficiently independent of the matters raised.

The Group will normally acknowledge a concern within five working days and explain, where possible, how it intends to deal with the matter.

The action taken will depend upon the nature and seriousness of the concern. This may include:

- an internal investigation;
- referral to another appropriate internal procedure;
- referral to the Governing Body or one of its Committees;
- obtaining specialist or independent advice;
- referral to a regulator, statutory authority or the police; or

- taking no further action where, following appropriate consideration, there is insufficient basis to proceed.

The person raising the concern may be asked to provide further information or attend a meeting. They may be accompanied at a meeting by a work colleague or trade union representative.

The Group will seek to keep the person raising the concern appropriately informed about progress and, when the matter has concluded, provide appropriate feedback. The nature and extent of information that can be provided may be limited by confidentiality, data protection, safeguarding, legal or other obligations.

The Group will seek to investigate concerns promptly. The time required will depend upon the nature and complexity of the matter and it is therefore not appropriate to prescribe a fixed period within which every investigation must be concluded.

PROTECTION AND SUPPORT

The Group will not tolerate retaliation, victimisation, harassment or any other detrimental treatment of a person because they have raised a genuine concern under this policy.

Anyone who believes that they have suffered detrimental treatment because they raised a concern should report this promptly to the HR Director, Chief Operating Officer, General Counsel or Head Master. Where appropriate, the matter will be investigated and may result in disciplinary action being taken against the person causing the detriment.

A person raising a whistleblowing concern will not be criticised or subjected to disciplinary action simply because a genuinely held concern proves to be mistaken or cannot be substantiated.

Knowingly making a false allegation maliciously is different from raising a concern which subsequently proves to be unfounded. Deliberately providing information known to be false may be dealt with under the Group's disciplinary procedures.

Nothing in an employment contract, settlement agreement, confidentiality agreement or other arrangement with the Group is intended to prevent a person from making a protected disclosure where permitted by law.

EXTERNAL DISCLOSURES AND INDEPENDENT ADVICE

The purpose of this policy is to provide safe and effective arrangements through which concerns can be raised and addressed within the Group. The Group therefore encourages concerns to be raised internally where appropriate.

The law also provides circumstances in which a person may make a protected disclosure outside the Group, including to an appropriate prescribed person or body.

Depending upon the nature of the concern, prescribed or relevant bodies may include regulators and statutory authorities with responsibility for education, safeguarding, health and safety, charity regulation, data protection or other matters.

The conditions applying to external disclosures can be complex. Anyone considering making an external disclosure may wish to obtain independent advice. Free and confidential whistleblowing advice is available from:

- **Protect:** Protect is a charity that provides expert advice and support to employees wishing to make a whistleblowing disclosure [Protect | Speak Up, Stop Harm](#).
- **ACAS:** ACAS provide independent employment advice to employees and employers. Their advisers can support staff making whistleblowing disclosures [The law - Whistleblowing at work - Acas](#).
- **NSPCC:** NSPCC operate an advice line for anyone wishing to make safeguarding related whistleblowing disclosures [Whistleblowing Advice Line | NSPCC](#).

Nothing in this policy prevents a person from reporting a matter to the police, a regulator, prescribed person or other appropriate authority where they are entitled or required to do so.

GOVERNANCE AND MONITORING

The Chief Operating Officer is responsible for ensuring that appropriate arrangements are maintained across the Group for the effective operation of this policy.

Appropriate records will be maintained of concerns raised, action taken and outcomes, subject to applicable confidentiality and data protection requirements.

The Governing Body, or an appropriate Committee acting on its behalf, will receive periodic assurance regarding the operation and effectiveness of the Group's whistleblowing arrangements. Reporting will protect the confidentiality of individuals so far as reasonably practicable.

The effectiveness of the Group's arrangements will be reviewed periodically, including whether staff understand how to raise concerns and have confidence that concerns will be taken seriously.

LEGAL AND REGULATORY FRAMEWORK

This policy has regard to relevant legislation and guidance, including:

- Employment Rights Act 1996, as amended;
- Public Interest Disclosure Act 1998;
- current Government guidance on whistleblowing and protected disclosures;
- current Acas guidance on whistleblowing at work;
- current statutory safeguarding guidance, including *Keeping Children Safe in Education*; and
- relevant guidance and good practice published by Protect.

The legislation governing protected disclosures is complex. Nothing in this policy is intended to provide legal advice or to limit any statutory rights available to an individual.

STATUS

This policy is non contractual and may be amended by the Group from time to time.

POLICY OWNER

Policy Owner: Chief Operating Officer.

RELATED POLICIES

- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Grievance Policy and Procedure
- Disciplinary Policy and Procedure
- Health and Safety Policy
- Anti Bribery and Corruption Policy
- Anti Slavery and Human Trafficking Policy

FURTHER INFORMATION

Further information about this policy or advice about raising a concern can be obtained from the COO or General Counsel.