



THE
LOUGHBOROUGH
Schools Foundation

Whistleblowing Policy

Document Management Information

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Approved By:	Finance, Audit and Risk Committee
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Dissemination:	The policy will be available to staff via the Policies SharePoint.

Revision History

Version	Description of Revision	Date Approved
1.0	New version on Foundation template. Minor edits to improve readability. New section 2 and 10. List of areas whistleblowing includes expanded. 4.2, 4.3 and 6.5 added.	1 May 2025

1. Introduction

- 1.1 Loughborough Schools Foundation (“LSF”) has adopted this policy and process on whistleblowing to enable staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice and failure to comply with legal obligations or unethical conduct.
- 1.2 LSF is committed to conducting its business with honesty and integrity and expects all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.
- 1.3 This policy does not form part of any contract of employment and may be amended at any time. It applies to all employees, officers, consultants, contractors, agency workers, casual workers and volunteers.
- 1.4 There is a difference between whistleblowing and raising a grievance:
 - whistleblowing is where an individual has a concern about a danger or illegality that has a public interest aspect to it, for example because it threatens pupils, third parties or the public generally; but
 - a grievance is a complaint that generally relates to an individual’s own employment position or personal circumstances at work.
- 1.5 This policy does not apply to grievances. If an individual has a concern about their own circumstances at work, they should refer to the Grievance Procedure.

2. Purpose

- 2.1 The purpose of this policy is to:
 - encourage staff to report suspected wrongdoing as soon as possible
 - reassure staff that their concern will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
 - reassure staff that they are able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken
 - provide staff with guidance as to how to raise those concerns

3. What is Whistleblowing?

- 3.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:
 - criminal activity
 - failure to comply with any legal or professional obligation or regulatory requirements
 - miscarriages of justice
 - danger to the health and safety of any individual
 - damage to the environment
 - financial fraud or mismanagement
 - negligence
 - unauthorised disclosure of confidential information
 - misconduct in the examination of public examinations
 - breach of a legal or professional obligation, or;
 - deliberate concealment of any of the above.

4. To whom should concerns be reported?

- 4.1 In most cases, individuals should raise any concerns with their line-manager. Alternatively, school-based staff can discuss the matter with the Head. Members of Central Services can report the concern to a Central Services Senior Leader.
- 4.2 If the concern is more serious or if an individual feels that the concern has not been adequately addressed by the line manager or Head, the matter should be escalated to the Head or Bursar.
- 4.3 If the concern involves the Head, Bursar or a Governor, the matter should be referred to the Chair of Governors. Where the concern relates to the Chair, it should be referred to the Chair of Finance, Audit and Risk.

5. Submitting concerns

- 5.1 A concern should be raised in writing wherever possible. The submission should include:
 - The nature of the concern
 - The names of individuals involved in the wrongdoing
 - Relevant dates and locations
 - Any supporting evidence and context
- 5.2 Staff raising a concern should also include details of any personal interest in the matter.

6. Responding to concerns raised

- 6.1 Concerns, which are reported under this policy, will be dealt with appropriately, consistently, fairly and professionally.
- 6.2 Once an individual has raised a concern(s), LSF will:
 - Arrange a meeting as soon possible to discuss the concern raised. The individual may be accompanied by a colleague or trade union representative. The companion must respect the confidentiality of the concern and any subsequent investigation. LSF may ask the individual for further information about the concern raised, either at this meeting or at a later stage.
 - Seek full details of the concern at this meeting and keep a clear written record. Further information may be requested during or after the meeting. The individual may be required to attend additional meetings in order to provide further information as the concern raised are investigated.
 - Establish whether there is sufficient cause for concern to warrant further investigation.
 - Decide on next steps following the meeting. This may include internal enquiries or, if appropriate, a more formal investigation. Depending on the nature of the concern, an independent external investigation may be commissioned.
 - If it becomes apparent the concern is not of a whistleblowing nature, the recipient should handle the concern in line with the appropriate policy/ procedure
- 6.3 LSF will endeavour to complete investigations within a reasonable time. In some cases, they may need to bring in an external, independent body to investigate.

- 6.4 Once the investigation, whether this was just the initial investigation of the concern, or whether further investigation was needed, is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether or not a referral is required to an external organisation, such as the local authority or police.
- 6.5 The individual who raised the concern will be kept informed of the investigation's progress and notified when it has concluded. An indication of any actions or next steps will be provided. However, information that would breach confidentiality or data protection obligations to others cannot be shared.

7. Confidentiality

- 7.1 All concerns raised will be treated in confidence and every effort will be made not to reveal the identity of an individual who raises a concern if that is their wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of a concern without the help of the individual who raised the concern, so the individual may be asked to come forward as a witness. If they agree to this, they will be offered advice and support.
- 7.2 LSF hopes that individuals will feel able to voice their concerns openly under this policy. Although a concern may be made anonymously, LSF encourages individuals to put their name to their allegation whenever possible. If this is not done, it will be much more difficult for LSF to protect the individual's position or to give feedback on the outcome of investigations.
- 7.3 Concerns that are expressed completely anonymously are much less powerful and are difficult to investigate. LSF will consider them at its discretion, taking into account factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources.

8. Raising your concern externally (exceptional cases)

- 8.1 LSF encourages all individuals to raise any concerns under this policy internally in the first instance. This ensures that matters can be addressed quickly and appropriately, and with the necessary context. Internal reporting is usually the most effective and appropriate route.
- 8.2 However, if an individual feels they cannot raise their concerns internally and they reasonably believe the information and any allegations are substantially true, they can raise it with a prescribed person (such as a regulator) provided the concern meets the legal definition of a qualifying disclosure.
- 8.3 Individuals are strongly encouraged to seek independent advice before raising a concern externally. The independent charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. More information and a list of prescribed bodies can be found on their website: <https://protect-advice.org.uk>.
- 8.4 Raising concerns publicly or with individuals or organisations who are not prescribed by law can carry risks, including legal implications and loss of protection under whistleblowing legislation. It is always advisable to take professional advice before taking this step.

9. Protection and support for those raising concerns

- 9.1 LSF is committed to good practice and high standards and to being supportive to individuals who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 9.2 Individuals who raise a genuine concern must not suffer any detriment as a result of doing so. If an individual believes that they have suffered such treatment, they should inform the Head of HR immediately. If the matter is not dealt with to the individual's satisfaction, the individual should raise it formally using the Grievance Procedure.
- 9.3 No member of staff must threaten or retaliate against an individual who has raised a concern and LSF will not tolerate any such harassment or victimisation. Any person involved in such conduct may be subject to disciplinary action.
- 9.4 However, to ensure the protection of all our staff, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or made in the public interest will also be liable to disciplinary action.

10. Policy Review and Updates

- 10.1 This policy will be reviewed annually to ensure it remains accurate and fit for purpose. The policy will be presented to the Committee for formal approval every two years, or sooner if significant changes are required.
- 10.2 Its application will be monitored to ensure compliance with equality legislation and to promote fair and consistent treatment for all staff.