



RUGBY  
SCHOOL  
GROUP

## Whistleblowing Policy

September 2025

## 1.0 INTRODUCTION

### 1.1 DEFINITIONS

'The School' refers to all establishments under the Rugby School Group either collectively or separately.

1.2 For the purposes of this policy, 'staff' or 'staff member' refers to anyone working at the School under a contract for employment or services or otherwise than under a contract, governors and other workers, including casual staff, agency staff, work placement students and independent contractors and consultants. Volunteers may also fall under the definition as used in this policy.

1.3 **About this Policy:** The School is committed to conducting its business with honesty and integrity, and we expect all staff to maintain high standards in all aspect of their conduct. . The School recognises that raising a whistleblowing concern can be daunting. However, it is important that any concerns are raised promptly in accordance with this policy so that the School can respond appropriately. A

1.4 **Aims:** This policy is designed to encourage you to report suspected wrongdoing as soon as possible, with the assurance that your concerns will be taken seriously and investigated appropriately. It provides guidance on how to raise concerns and reassures you that you can do so without fear of reprisals, even if your concerns are ultimately unfounded

## 2.0 STAFF

2.1 All types of wrongdoing are included whether they are acts committed by fellow staff members, faults in School procedures or oversights that should be rectified. The procedure should be used even in the event that the act or omission causing you concern has finished or has not yet started.

2.2 This policy covers all employees, officers, governors, consultants, contractors, volunteers, work placement students, casual workers and agency workers.

2.3 This policy applies to all staff members, governors, consultants, contractors, volunteers, work placement students, casual workers, agency workers. They are asked to report any concerns, which they may have about alleged workplace malpractice internally and in accordance with this policy. The School will support the individual if they make a report.

2.4 This procedure should not however be used where you have a complaint relating to your personal circumstances in the workplace. The Grievance Procedure should be used in such cases.

## 3.0 POLICY STATEMENT

### 3.1 WHEN SHOULD THIS PROCEDURE BE USED?

3.2 Staff members should use this procedure if they have a genuine concern about suspected past, current or future workplace malpractice (see examples below) and such disclosure is in the public interest. It may not always be clear whether the conduct, which concerns them, amounts to malpractice and they will need to form their own judgment. The School would encourage individuals to report their concerns where they are in doubt without fear of

reprisals, even if they turn out to be mistaken.

3.3 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity;
- safeguarding concerns, including low-level concerns about staff;
- failure to comply with any legal [• or professional] obligation or regulatory requirements;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- bribery;
- financial fraud or mismanagement;
- other unlawful or unethical conduct in the workplace; or
- the deliberate concealment of any of the above matters.

#### **4.0 HOW TO REPORT A CONCERN**

4.1 If a staff member has a concern, they should report it to their Head of Department or Line Manager or, if the concern is related to safeguarding, to the Designated Safeguarding Lead (DSL). However, where you prefer not to raise it with your manager for any reason, you should contact the HR Director.

4.2 A whistleblower is a person who raises a genuine concern relating to any of the above. Reporting concerns about your own conduct or alleged conduct will not be considered whistleblowing but rather as part of your contractual duty of disclosure, with investigation commenced as appropriate. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities and such disclosure is in the public interest (a whistleblowing concern) you should report it under this policy.

4.3 They should indicate if they wish to remain anonymous or raise a matter in confidence. The School will take into account any request for confidentiality, but it may not be able to guarantee confidentiality. Disclosure of their identity or of information may become unavoidable in the course of an investigation or in court proceedings. If they have any personal interest in the matter, they should declare it when raising the concern. Completely anonymous disclosures are difficult to investigate, and we will not be able to provide you with feedback. However, we would rather you raise a concern anonymously than remain silent, and we will investigate all reports to the best of our ability.

#### **5.0 HOW WILL THE SCHOOL DEAL WITH THE MATTER**

##### **5.1 STAGE 1**

Procedure: You should disclose the suspected wrongdoing first to your Head of Department / Line Manager. In the event that your Head of Department / Line Manager is involved in the suspected wrongdoing, you shall be entitled to proceed directly to Stage Two of this procedure. If the concern relates to safeguarding, it should be reported directly to the DSL.

5.2 Response: You can expect a response detailing to whom the disclosure has been notified or any action taken within 7 working days (dependent on School holidays) of your Head of Department / Line Manager or DSL becoming aware of the disclosure.

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### 5.3 STAGE 2

Procedure: If no response is forthcoming after 7 working days (dependent on School holidays) or if your Head of Department / Line Manager is involved in the suspected wrongdoing you shall be entitled to notify the Head Master or Chief Operating Officer (COO), as appropriate.

- 5.4 Response: You can expect a response detailing any action taken within 7 working days (dependent on School holidays) of the Head Master or Chief Operating Officer (COO) becoming aware of the disclosure.

### 5.5 STAGE 3

Procedure: If no such response is forthcoming after 7 working days (dependent on School holidays), you should inform the Chair of Governors of the disclosure.

- 5.6 Please note that if the disclosure/matters raised requires significant lengthy investigation the School reserves the right to provide a response outside the timescales given above. You will be kept notified of this during the investigation. You may bring a colleague or trade union representative to any meeting if you wish. Where appropriate, a member of the HR department may also be present. The relevant manager will assess how your original concern was handled before informing you in writing of any outcomes as soon as possible.

### 6.0 NSPCC

- 6.1 The NSPCC whistleblowing advice line is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8am-10pm Monday-Friday or 9am-6pm weekends) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk). Alternatively staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London, EC2A 3NH.

- 6.2 Bypassing the procedure: In extreme circumstances, you will have the right to raise your concern directly with a relevant and appropriate outside body without first having followed the stages above. This may however cause damage to the School and its reputation as well as constitute a breach of your own duty of confidentiality towards the School and this action should only be taken in exceptional circumstances and after careful thought.

- 6.3 Exceptional circumstances: The School will consider exceptional circumstances exist where you have a reasonable belief that: the School will subject you to detriment if you inform your Head of Department / Line Manager in accordance with Stage one above or if you inform the Head Master or Chief Operating Officer (COO) in accordance with Stage two or you inform the Chair of Governors in accordance with Stage three; a cover-up is being mounted by the School; or a disclosure made previously to your Head of Department / Line Manager or the Head Master or Chief Operating Officer (COO) or the Chair of Governors in accordance with the stages above has not prompted a satisfactory response.

### 7.0 SUPPORT AND PROTECTION

- 7.1 The School will provide appropriate support for anyone raising a genuine concern provided this procedure is used appropriately and correctly; you will not suffer any detriment as a result of reporting a suspected wrongdoing in good faith. In particular it will not tolerate retaliation or victimisation.

7.2 Provided that this procedure is used appropriately and correctly, you will not suffer any detriment as a result of reporting the wrongdoing. A failure to follow this procedure may however make the disclosure unreasonable and the protection given to you by this procedure may be lost.

7.3 **Advice:** Staff are strongly encouraged to seek advice before reporting a concern to anyone external. In most cases you should not find it necessary to alert anyone external but before you do, as well as considering the internal help and support available which is identified above, please seek external advice from:

- **Protect:** If you have any concerns about disclosing a suspected wrongdoing the independent whistleblowing charity, Protect, operates a confidential helpline. Staff can call 020 3117 2520 for advice.
- **NSPCC:** The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0808 028 0285 (08:00 to 20:00 Monday to Friday and 9 am - 6 pm Saturday and Sunday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- **The Modern Slavery helpline:** The Modern Slavery helpline is available for staff who do not feel able to raise concerns about modern slavery internally. Staff can call on 0800 0121 700.

## 8.0 EXTERNAL REPORTING

It is recognised that there may be circumstances where a staff member feels they should properly report matters to external bodies. If they are unsure whether this is appropriate and do not feel able to discuss the matter internally with the HR Director.

8.1 **The Media:** Under no circumstances should staff approach or report any matters to a commercial body or the media with details of the suspected wrongdoing. If you approach any such body and / or where your concern is disclosed in a malicious manner or for personal gain, the protection given to you by this procedure may be lost. Additionally, the School may consider this to be gross misconduct and disciplinary action may be taken against you.

8.2 The School believes that contacting an external body should only apply in exceptional circumstance. If they do so, they should inform the Chief Operating Officer (COO).

8.3 **Outside body:** The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. The law recognises, that in some circumstances it may be appropriate to report concerns to a relevant outside body including:

- the local authority's Designated Officer;
- Children's Social Care;
- the NSPCC;
- the Health and Safety Executive;
- the Environment Agency;
- the Information Commissioner;
- the Department for Education, where referrals can be made at <https://www.gov.uk/contact-dfe>;
- the Department for Business, Energy and Industrial Strategy;

- the police;
- the Charity Commission;
- the Boarding Schools Association;
- the Independent Schools Inspectorate;
- the Office for Standards in Education, Children's Services and Skills (**Ofsted**);
- the Channel Police Practitioner;

This list is not exhaustive.

## 9.0 MISUSE OF THIS PROCEDURE

- 9.1 It is a very serious matter to raise a concern, which a staff member knows to be false, or which is made in bad faith or maliciously. Such action may amount to gross misconduct and may result in disciplinary action under the School's disciplinary policy.

## 11.0 SAFEGUARDING

- 11.1 Nothing within this policy is intended to prevent staff from complying with their statutory obligations in accordance with Keeping Children Safe in Education (DfE, September 2022). In particular:

- **Safeguarding / Child Protection Policy:** If you have any concern about a pupil's welfare, action should be taken immediately (even if they are low level concerns). You should report the concern to the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead. See the School's 'Safeguarding and Child Protection Policy' and associated procedures for full information about what to do if you have a concern about a pupil, including what to do if the Designated Safeguarding Lead is not available.
- **Safeguarding - member of staff:** Low-level concerns about staff should be raised with the Designated Safeguarding Lead. You should raise any more serious safeguarding concerns about another staff member with the Head Master, or if the concern is about the Head Master, the Chief Operating Officer, with the Chair of Governors (without first notifying anyone else). More information may be found in the School's 'Safeguarding and Child Protection Policy' and associated procedures.
- **Whistleblowing Policy:** You should follow this procedure to raise concerns about poor or unsafe practices at the School or potential failures by the School or staff to properly fulfil its safeguarding responsibilities.

## 12.0 THE MODERN SLAVERY HELPLINE

- 12.1 The School is committed to the prevention of Modern Slavery. If you have any queries relating to Modern Slavery, please contact the HR Director and/or refer to the School's Anti-Slavery and Human Trafficking Policy. Identified instances of modern slavery should be immediately notified to the Police. If you think you have identified an instance of modern slavery, or if you consider that you may be a victim of modern slavery you may contact the Modern Slavery helpline on 0800 0121 700.

## 13.0 EXIT INTERVIEWS

- 13.1 All staff are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct

of staff or other matters, during the course of their employment in accordance with this policy. Safeguarding children is at the centre of the School's culture and concerns should always be raised in accordance with paragraph 11 above. If issues have not been identified before, safeguarding will always be considered formally during staff performance development reviews and appraisal and finally at exit interviews which are held upon request with employees leaving the School.

#### **14 BREACHES**

14.1 Breaches of this policy by any staff member will be dealt with in accordance with the Discipline Policy and Procedure.

#### **15.0 STATUS**

15.1 Non-contractual Policy: This policy does not form part of your contractual employment, and we may amend it at any time.

#### **16.0 RELATED POLICIES**

Anti-Slavery and Human Trafficking  
Discipline Policy and Procedure  
Safeguarding and Child Protection Policy  
Code of Conduct

#### **17.0 FURTHER INFORMATION**

17.1 Further information and guidance regarding this policy or its application can be obtained from the HR Department; [hr@rugbyschool.net](mailto:hr@rugbyschool.net)