

GLC Whistleblowing Policy

This Policy was ratified by the Board of Directors on :	Spring 2026
This Policy will be reviewed by the GLC Board on :	Spring 2027

GLC Mission Statement

The GLC's mission is to develop active and thriving citizens within a diverse, truly fair and equal community.

This will be achieved through:

- High quality teaching that deliberately develops competencies of curiosity, creativity, communication and critical-thinking;
- An inspiring and meaningful curriculum;
- The development of productive relationships by instilling the values of compassion, resilience, responsibility and aspiration to prepare our young people for learning and life;
- A commitment to the wellbeing of our staff;
- A culture of professional generosity, collaboration, challenge and support throughout the GLC;
- The development of effective external partnerships for the benefit and wellbeing of our community.

Equalities Statement

The GLC's commitment to equality is enshrined in our mission statement to develop 'active and thriving citizens within a diverse, truly fair and equal community'.

We are a vibrant, innovative and successful organisation: we work hard to be the place of choice to work and to learn. Across the 5 academies of the GLC, we pledge that everyone enjoys an equality of opportunity. We work tirelessly to ensure that individual characteristics including age, ethnicity, socio-economic background, academic ability, disability, gender, religious beliefs, sexual orientation are not discriminated against in any way. We create inclusive environments characterised by mutual respect where difference is celebrated.

GLC Whistleblowing Policy

Public Interest Disclosure Act 1998

1. Introduction

- 1.1 The Public Interest Disclosure Act 1998 [“the Act”] protects workers and employees from detrimental treatment or dismissal as a consequence of disclosing information about unlawful actions of their employer or information about the conduct or behaviour of employees, volunteers or others associated with the operation and organisation of the school. This is known as “whistleblowing”. The protection applies to employees, volunteers, agency and contract workers. The GLC is committed to creating an open and supportive environment where individuals feel able to make a disclosure and feel confident in the process that will be followed. This policy sets out how disclosures can be made and how they will be handled. All disclosures will be treated consistently and fairly.

Employees who have a role involving finance should also have regard to the Financial Regulations document for their school which includes a Whistleblowing Policy containing specific provisions relating to financial issues.

The law [Public Interest Disclosure Act 1998] provides protection for employees or workers who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by an employee or worker who has a reasonable belief that there has been or is likely to be:

- A breach of any legal obligation;
- a miscarriage of justice;
- a criminal offence;
- a danger to the Health and Safety of any individual;
- damage to the environment; and,
- deliberate concealment of information about any of the above

Some examples of qualifying disclosures in a school context may include:

- Fraudulent acts [e.g. manipulation of accounting records/finances, inappropriate use of funds, decision making for personal gain, abuse of position to influence decisions];
- Breaches of acceptable professional and ethical standards;
- Breaches of the GLC Health and Safety policy entailing danger to staff or pupils; and/or
- Breaches of any of the GLC policies or the Code of Conduct.

It is not necessary for the employee or worker to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient.

For the purpose of this policy the term ‘whistle-blower’ refers to the individual making the disclosure.

- 1.2 The whistle-blower must reasonably believe they are making the disclosure in the public interest. [i.e it affects others such as pupils in school or members of the public]. This means that personal grievances and complaints [e.g. a concern about their own contractual terms, treatment of their child] are not usually covered by this policy and should be dealt with:

- By employees through the Grievance Procedure;
- By other parties through the complaints Procedure.

The GLC Board encourages the ‘Whistle-blower’ to raise the matter internally in the first instance. Concerns should normally be raised initially with the employee’s line manager. If a concern is raised verbally it should be followed up in writing wherever possible. However, where the complaint relates to the employee/worker’s line manager, the complaint should be brought to the attention of a more senior manager, the Head of School or Viki Reid [CEO] or Lynda Pritchard [Chair of the Board of Directors].

2. Raising concerns

- 2.1 If the whistle-blower considers the matter too serious or sensitive to raise it internally, they may refer the matter to an external prescribed body. A prescribed body is an organisation, normally with some regulatory function [for example the Health and Safety Executive], which is prescribed by the Secretary of State for the purposes of the Public Interest Disclosure Act who an individual may make a protected disclosure to. Any such disclosure to a prescribed body will qualify for protection under the Act. A list of prescribed bodies is available at the following link: [Blowing the whistle to a prescribed person - GOV.UK](#)

In the event that the whistle-blower feels a disclosure should be referred to an external prescribed body some of the relevant bodies are also set out below:

Nature of Disclosure:	External Reporting/Prescribed Body:
Fraud/ financial malpractice [see 3.2 below]	[Academies and Schools] Report fraud or financial irregularity to DfE - GOV.UK allegations.mailbox@education.gov.uk
Child Protection/Safeguarding issues	Local Authority Designated Officer [LADO] Email: LADO@thurrock.gov.uk Phone: 01375 652 866 NSPCC Whistleblowing helpline: 0800 028 0285 Email: help@nspcc.org.uk
Data protection issues	Information Commissioner https://ico.org.uk/
Health and Safety issues	Health and Safety Executive http://www.hse.gov.uk/

- 2.2 Where the complaint is serious, for example involving fraud, theft or other potential gross misconduct, employees/workers should act quickly to report it but should not mention it to the subject of the complainant or other colleagues as that could prejudice any investigatory process.
- 2.3 It may be the case that employees/workers will have very genuine and justified suspicions of wrong-doing even though at the time of reporting they cannot point to concrete evidence. That should not deter employees/workers from going ahead and reporting the matter, particularly where it may involve potential risk to vulnerable people.
- 2.4 The Whistle-blower has no responsibility for investigating the matter - it is the GLC's responsibility to ensure that an appropriate investigation takes place.

3. Action by recipients of disclosures

- 3.1 It would be inappropriate to have hard or fast rules and judgement must be exercised. While it is essential for problems to be tackled effectively and with the aim of righting wrongs, this may well be best achieved in many less serious cases by discussion with the 'offending' employee/worker and securing a commitment as to future standards and corrective action. In other more serious cases the matter may need to be passed to a more senior level of management or directly to the chair of governors, as appropriate.

Once a disclosure has been made, a designated member of senior staff or governor will be responsible for handling the grievance and may ask the whistle-blower to attend a meeting to gather all the information needed to ensure a clear understanding of the situation. Where a meeting is held, the whistle-blower may

be accompanied by a trade union representative or work colleague if they wish and where possible the dates/times will be agreed to facilitate this.

Requests to be accompanied must be clearly communicated to the school allowing adequate time for the school to deal with the companion's attendance at the meeting. The request should be made in advance of the meeting providing the name of the companion and whether they are a fellow worker or trade union official or representative.

- 3.2 Where complaints are received from members of the public, the GLC's formal complaints procedure [as contained in the school Customer Care Code of Practice] must be followed, unless the complaint relates to the specific conduct or performance of an individual employee/worker in which case the Disciplinary Procedure may need to be instigated.
- 3.3 Any written complaint/allegation should be given a written acknowledgement and confirmation that the matter will be looked into. Unless clearly made in a very low key way about minor matters, verbal complaints/allegations should receive a written acknowledgement in the same way.
- 3.4 In the event of the allegation being of a very serious nature, for example relating to a fraud or other potential gross misconduct offence, there may well be a need to involve the GLC's auditors and/or the police. This should normally be agreed initially by the CEO who should, in turn, and where appropriate, keep the GLC Board informed in view of any possible implications concerning public monies. Advice may be sought from the school's legal advisers before involving the police in any such internal complaint or allegation. The school must notify the DfE of any instances of fraud, theft or irregularity where the value exceeds £5,000 individually, or £5,000 cumulatively in any financial year. Any unusual or systematic fraud, regardless of value, must also be reported. See 2.1 above.
- 3.5 When any complaint or allegation has been looked into and resolved or dealt with, the person who raised the matter in the first instance should be notified of that, normally in writing unless common-sense indicates that it can be done more appropriately in a verbal, informal way. How much detail to give of findings and outcomes is a matter of judgement and it would, for example, be inappropriate to disclose details of disciplinary actions taken against another employee.
- 3.6 All disclosures will be handled by the school in a timely manner. The timescales for handling disclosures will differ depending on the nature of the disclosure made but all disclosures [whether formal or informal] will be acknowledged by the school within [2] working days. The timescales for any further steps in the process will be notified to the whistle-blower when the disclosure is acknowledged.

4. Investigation

The person to whom the initial disclosure is made will arrange an investigation into the matter either by investigating the matter themselves or immediately passing the issue to an appropriate person [except where they are the subject of the disclosure where an alternative suitable person will be appointed]. The investigation may involve the whistle-blower and other individuals involved giving a written statement. Any investigation will be carried out promptly and confidentially.

If a whistle-blower wishes to remain anonymous this should be raised with the person to whom the initial disclosure is made. In some cases, this may be possible but in more serious cases where disciplinary action may have to be taken against others this may be more difficult. The school is committed to protecting the well-being of the whistle-blower whilst this policy is followed.

The whistle-blower's statement [where available] will be taken into account, and they will be asked to comment on any additional evidence obtained. The person responsible for the investigation may ask the whistle-blower to attend a meeting to gather all the information needed to ensure a clear understanding of the situation.

Where a meeting is held, the whistle-blower should be permitted to be accompanied by a trade union

representative or work colleague if they wish and where possible the dates/times will be agreed to facilitate this, or in the case of a third party, by an appropriate person [e.g. friend, family, colleague]. Legal professionals will not normally be allowed to attend such meetings.

4.1 **Outcome of the investigation**

The person who carried out the investigation will take any necessary action, which may include reporting the matter to the Head of School/CEO/GLC Board or an appropriate prescribed body [if this has not already taken place].

At the conclusion of any investigation, the whistle-blower will be told the outcome of the investigation [in as much detail as is deemed appropriate in the circumstances] and what action is to be taken or is proposed. If no action is to be taken, the reason for this will be explained.

Where a concern is raised anonymously the GLC will not ordinarily be able to provide feedback to the whistle-blower and any action taken as a result of an anonymous disclosure may be limited. The school will take all appropriate steps to investigate such a disclosure in line with the level of information provided. If an anonymous whistle-blower wishes to seek feedback from the school an appropriate anonymised email address should be provided.

4.2 **Further action**

Where having raised an initial concern and the whistle-blower has a genuine belief that the person to whom the initial disclosure was made failed to take appropriate action or investigate the issue properly and they wish to pursue the matter further, they may report their concern to the **Head of School/CEO or GLC Board** or to an appropriate prescribed body [if this has not already been reported].

The **Head of School/CEO/or GLC Board** may arrange for further investigation to be carried out, make any necessary further enquiries and/or make their own report. On the conclusion of any further investigation, they will take appropriate action which may include reporting the matter to a prescribed body if this has not taken place at an earlier stage in the process.

Should the whistle-blower remain dissatisfied with the management of the concern, they are entitled to raise the matter with an appropriate prescribed body listed under Section 2.1, ensuring they follow any relevant requirements for protected disclosures.

5. **Protecting 'whistle-blowers'**

5.1 Any whistle-blowers who make protected disclosures in line with this procedure have the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure. This means continued employment and opportunities for promotion or training will not be affected because the whistle-blower has raised a legitimate concern.

5.2 Any form of discrimination or victimisation against a whistle-blower for raising a genuine concern is strictly prohibited and may also contravene the Equality Act 2010. Whistle-blowers should report any harassment or victimisation to an appropriate manager as soon as practicable. The school will take all reasonable steps to prevent/address such harassment or victimisation. Victimisation of a whistle-blower for making a protected disclosure will be considered a disciplinary matter and will be dealt with under the Disciplinary Procedure.

5.3 Whistle-blowers may find the process of reporting an issue/wrongdoing difficult and uncomfortable. The school will take all reasonable steps to support the whistle-blower which may include access to an external counselling service. The whistle-blower may also be referred to the charity Protect [previously known as Public Concern at Work] <https://protect-advice.org.uk/> for information and advice.

6. **What if an employee receives a complaint about him/herself?**

6.1 If the complaint or allegation is at all significant or made in a formal way, particularly by a member of the public or other external users, then employees/workers should inform their line manager or CEO in the

case of Heads of School – even if they believe or know the complaint to be groundless or unjustified.

6.2 Where a complaint or ‘grumble’ clearly does not justify taking up the line in this way, making a brief note on a file or diary or similar will often be advisable.

7. Malicious allegations/disclosures

7.1 If, following appropriate investigation, it is considered that an employee has made a malicious allegation without real substance and/or which could not be reasonably considered to be in the public interest, this will be taken as a most serious matter and may potentially lead to disciplinary action in line with the GLC Disciplinary procedure.

7.2 Where other individuals engaged by the GLC make a malicious allegation, the GLC will investigate the allegation thoroughly and take appropriate action, which may include terminating the contract/arrangements with the individual.

7.3 If disciplinary action is required, the person who carried out the investigation will report the matter to a relevant manager to start the disciplinary procedure.

7.4 If a third party has made a malicious allegation the board may take legal advice about steps open to it where appropriate.

8. Data Protection

When an individual makes a disclosure, the GLC will process any personal data collected in accordance with its data protection policy and General Data Protection Regulation [GDPR] and the Data Protection Act 2018. Data collected from the point at which the individual makes the disclosure is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.