

Whistleblowing Policy

ISI Code:	7b Whistleblowing Policy
Policy Author:	Director of People
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INTRODUCTION

This policy is designed to meet the School's obligations, under the Public Interest Disclosure Act 1998 (PIDA), to safeguard any member of staff from negative treatment or unfair dismissal when they report wrongdoing as a whistleblower. The School recognises that PIDA is part of the Employment Rights Act 1996 and that it is automatically unfair to dismiss an employee for making a disclosure in good faith.

The School is committed to conducting its business with honesty and integrity, and expects all staff to maintain high standards in all aspects 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.

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.

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 2025).

This policy does not form part of your contractual employment, and the School may amend it at any time.

DEFINITIONS

The 'School' refers to all establishments which are part of the Caterham Family of Schools, either collectively or separately.

'Staff', for the purposes of this policy, refers to anyone working for the School under a contract of employment or for services, other workers including casual staff, Agency staff and work placement students and Governors.

POLICY STATEMENT

The School encourages a free and open culture in its relationships with employees, parents, pupils and all people with whom it engages. In particular, the School recognises that effective and honest communication is essential if any malpractice is to be effectively dealt with.

This policy is designed to provide guidance to all those who work with or within the School who may from time to time feel that they need to raise certain issues, relating to the management of the School or the care of its pupils, with someone in confidence.

Caterham Family of Schools Whistleblowing Policy

June 2026

Staff must acknowledge their individual responsibility to bring matters of concern to the attention of senior management or the relevant agencies. Although this can be difficult at times this is particularly important where the welfare of children may be at risk.

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 below should be used even in the event that the act or omission causing you concern has finished or has not yet started. This procedure should not, however, be used where you have a complaint relating to your personal circumstances in the workplace; the School's Grievance Procedure should be used in such cases.

WHEN SHOULD THIS PROCEDURE BE USED?

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.

A whistleblowing disclosure can cover a range of serious issues, including (but not limited to) the following:

- a criminal offence (for example fraud)
- someone's health and safety is in danger
- risk, or actual damage, to the environment
- a miscarriage of justice
- the School is breaking the law (for example it does not have the right insurance)
- you believe someone is covering up wrongdoing
- sexual harassment

While it is not necessary that you prove the malpractice or misconduct that you are alleging, but may simply raise a reasonable suspicion, please note that you will not be protected from the consequences of making such a disclosure if, by doing so, you commit a criminal offence if it is made in good faith.

HOW TO REPORT A CONCERN

Stage 1

If you wish to raise a concern under this policy, you should make contact as follows:

- Caterham - the COO or Director of People;
- Caterham Prep – the Caterham COO or Director of People;
- Copthorne – the Caterham COO or Director of People;
- The Hawthorns – the Bursar or Director of People.

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 the relevant person above becoming aware of the disclosure.

In the event that the relevant person above is involved in the suspected wrongdoing, you shall be entitled to proceed directly to Stage 2 of this procedure (see below).

Caterham Family of Schools Whistleblowing Policy

June 2026

If the concern relates to safeguarding, it should be reported directly to the DSL - please refer to the School's Safeguarding (Child Protection) Policy.

Stage 2

If no response is forthcoming after 7 working days (dependent on School holidays), or, if the relevant person above is involved in the suspected wrongdoing you shall be entitled to notify the following, as appropriate:

- Caterham - the Headmaster;
- Caterham Prep – the Executive Head;
- Copthorne – the Executive Head;
- The Hawthorns – the Head (THS).

Stage 3

If no such response is forthcoming after 7 working days (dependent on School holidays), or, if the relevant person above is involved in the suspected wrongdoing, you should inform the Caterham Chair of Trustees (ChairOfTrustees@caterhamschool.co.uk) of the disclosure.

At each stage, you should indicate if you 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 your identity or of information may become unavoidable in the course of an investigation or in court proceedings. If you have any personal interest in the matter, you should declare it when raising the concern. Completely anonymous disclosures are difficult to investigate, and the School will not be able to provide you with feedback. However, the School would rather you raise a concern anonymously than remain silent, and the School will investigate all reports to the best of its ability.

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.

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.

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 make a disclosure in accordance with Stage 1, Stage 2 or you inform the Chair of Trustees in accordance with Stage 3; a cover-up is being mounted by the School; or a disclosure made previously in accordance with the stages above has not prompted a satisfactory response.

SUPPORT AND PROTECTION

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, the School will not tolerate retaliation or victimisation.

A failure to follow this procedure may however make the disclosure unreasonable and the protection given to you by this procedure may be lost.

EXTERNAL REPORTING

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 09:00 to 18:00 Saturday and Sunday) or email 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 08000 121 700.

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. The law recognises, however, that in some circumstances it may be appropriate to report concerns to a relevant outside body such as (though this is not an exhaustive list):

- 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;
- _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.

However, 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.

While the School hopes that such disclosures will never be necessary, it also recognises that it may find itself in circumstances that are new to it. It is recognised that whistleblowing can be difficult and stressful. Advice and support is available from your line manager, HR Department and/or your professional or trade union.

“Absolutely without fail – challenge poor practice or performance. If you ignore or collude with poor practice it makes it harder to sound the alarm when things go wrong.” (“Sounding the Alarm” – Barnardos)

Surrey Children’s Services emergency duty team line is 03004709100 (01483 517898 out of hours)

This policy works in conjunction with the Staff Code of Conduct, the Child Protection (Safeguarding) Policy, the Grievance procedures and Disciplinary procedure, Working Together 202323023, Keeping Children Safe in Education, 2025 and Making Barring referrals to the DBS.

Please note that the Data Protection Act 2018 does not prevent, or limit, the sharing of information for the purpose of keeping children safe.