Whistle-Blowing Policy At HKKG

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1. Aims

This policy aims to:

- Encourage a culture of openness, honesty and accountability in which all individuals feel able to raise concerns about wrongdoing, malpractice, misconduct, safeguarding failures or unlawful conduct without fear of reprisal. [gov.uk]
- Ensure that concerns are raised at the earliest possible opportunity and are taken seriously, investigated appropriately and responded to fairly and proportionately
- Provide clear procedures for reporting concerns and ensure that all workers understand how concerns can be raised both internally and, where necessary, externally.
- Promote and maintain a strong safeguarding culture by ensuring that all staff understand their responsibility to raise concerns about the welfare and safety of children, safeguarding practice, staff conduct and leadership decision-making.
- Ensure that concerns about safeguarding, including allegations against adults working with children, low-level concerns, unsafe recruitment practices or failures to comply with statutory safeguarding duties, are promptly reported and managed in accordance with safeguarding legislation and statutory guidance, including **Keeping Children Safe in Education 2026.**
- Reassure individuals that they will not suffer detriment, victimisation, harassment or disadvantage as a result of raising a genuine concern in good faith, even where the concern is subsequently found to be unfounded.
- Ensure that all workers understand the protections available under the **Public Interest Disclosure Act 1998** and that confidentiality clauses, settlement agreements or non-disclosure agreements cannot prevent an individual from making a protected disclosure where permitted by law.
- Ensure that concerns involving senior leaders, governors, trustees, proprietors or members can be raised independently of normal management structures and, where appropriate, referred directly to external agencies or regulators.

This policy does not form part of any employee's contract of employment and may be amended from time to time.

This policy applies to all employees, volunteers, trainee teachers, governors, trustees, officers and members of the Trust. It also applies to agency workers, contractors, consultants, apprentices, casual workers and any other individual working on behalf of the Trust.

2. Legislation

This policy has been developed in accordance with relevant legislation, statutory guidance and regulatory requirements, including:

- **Keeping Children Safe in Education 2026**, which requires schools and trusts to have appropriate whistleblowing procedures and a safeguarding culture in which concerns can be raised and acted upon appropriately. [gov.uk]
- **Working Together to Safeguard Children.**
- **The Public Interest Disclosure Act 1998 (PIDA).**
- **The Employment Rights Act 1996**.
- Relevant safeguarding, equality, health and safety, employment and data protection legislation.

This policy should be read alongside the School's:

- Child Protection and Safeguarding Policy 2026;
- Staff Code of Conduct;
- Low-Level Concerns Policy;
- Managing Allegations Against Staff Policy;
- Grievance Policy;
- Disciplinary Policy; and
- Complaints Policy.

This policy complies with the statutory safeguarding obligations.

3. Definition of Whistle-blowing

Whistle-blowing is the reporting of suspected wrongdoing, illegal acts, dangers or failures that are in the public interest. A concern is likely to be a whistle-blowing concern if it affects others, such as pupils, staff, the school or the wider public, rather than relating solely to an individual's personal employment circumstances.

Examples of whistle-blowing concerns include, but are not limited to:

- Criminal offences, such as fraud, bribery, theft or corruption;
- Risks to the health, safety or welfare of pupils, staff or others;
- Poor, unsafe or ineffective safeguarding practice;
- Failure to act on safeguarding concerns;
- Unsafe recruitment or vetting practices;
- Breaches of statutory duties, legal obligations or regulatory requirements;
- Financial malpractice or misuse of school funds;
- Serious misconduct, abuse of authority or unethical behaviour;
- Sexual harassment or sexual misconduct;

- Deliberate concealment of any of the above matters;
- Damage to, or risks to, the environment.

A whistle-blower is a person who raises a genuine concern about suspected wrongdoing, malpractice or risk in the public interest.

In accordance with **Keeping Children Safe in Education 2026**, all staff have a responsibility to raise concerns about poor or unsafe practice and any potential failures in the school's safeguarding arrangements. Concerns about safeguarding culture, leadership decisions, staff conduct or failures to protect children should be reported promptly and appropriately.

4. Procedure for Raising a Whistleblowing Concern

4.1 When to Raise a Concern

Staff should consider the examples outlined in Section 3 when deciding whether a concern falls within the scope of this policy. A concern may be raised where a person reasonably believes that wrongdoing has occurred, is occurring or is likely to occur.

This may include concerns relating to:

- Safeguarding failures or poor safeguarding practice;
- Criminal offences;
- Breaches of statutory duties or legal obligations;
- Financial malpractice or misuse of funds;
- Health and safety risks;
- Fraud, corruption or bribery;
- Misconduct by staff, leaders, governors or trustees;
- Deliberate concealment of any of the above matters.
- Concerns should be raised as soon as possible to enable appropriate action to be taken.

4.2 Who to Report Concerns To

School-based staff should normally report concerns to the Headteacher, **Mrs N. Ellahi**.

If the concern relates to the Headteacher, if it is believed that the Headteacher may be involved in the matter, or if the individual does not feel able to raise the concern with the Headteacher, the concern should be reported to the **Chair of Trustees**, **Mr M. L. Habib Ullah**, at:

Email: enquiries@hkkg.bham.sch.uk

If the concern relates to the Chair of Trustees, a Trustee, the Board of Trustees collectively, or where there is a potential conflict of interest within the Trust's governance structure, the concern should be reported directly to the appropriate external authority, including:

Local Authority Designated Officer (LADO)

Email: ladoteam@birminghamchildrenstrust.co.uk

Where appropriate, concerns may also be referred to:

- Children's Social Care;
- The Police;

- The Department for Education (DfE);
- The Disclosure and Barring Service (DBS);
- The Teaching Regulation Agency (TRA);
- The Charity Commission;
- The Trust's external auditors or regulators.

Staff may raise concerns directly with an external prescribed person or regulator where they reasonably believe that internal reporting would not be appropriate or where they believe there is a risk that evidence may be concealed or the matter may not be addressed appropriately.

All concerns will be treated seriously and investigated proportionately, fairly and confidentially wherever possible.

4.3 How to Raise a Concern

Concerns should be raised as soon as possible and, wherever practicable, should be made in writing. A disclosure should include:

- The nature of the concern;
- The names of those involved, where known;
- Relevant dates, times and locations;
- Details of any witnesses;
- Any supporting evidence available; and
- Any personal interest the individual may have in the matter.

Individuals are encouraged to provide their name when raising a concern, as this will assist the School in conducting a fair and thorough investigation.

At Hazrat Khadijatul Kubra Girls' School, we are committed to ensuring that concerns raised under this policy are treated sensitively and confidentially wherever possible. Every effort will be made to protect the identity of an individual making a disclosure. However, there may be circumstances where it is necessary to disclose their identity in order to conduct a full and fair investigation or where required by law. In such circumstances, the school will discuss this with the individual wherever reasonably practicable before any disclosure is made.

Anonymous disclosures will be considered and investigated where appropriate. Asa school, we recognise that investigations may be more difficult where the source of the concern is unknown. The weight given to an anonymous concern will depend upon factors such as:

- The seriousness of the issues raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation through other sources.

Individuals who are concerned about possible reprisals, victimisation or detrimental treatment as a result of raising a concern should raise this immediately with the person handling the matter, the Headteacher, the Chair of Trustees or another appropriate contact identified within this policy. Appropriate steps will be taken to protect individuals who raise genuine concerns in accordance with this policy.

Independent advice may also be obtained from Protect, the UK's whistleblowing charity, which provides free and confidential guidance to workers considering raising a concern.

Safeguarding Concerns

Where a concern relates to the immediate safety, welfare or protection of a child, it must be reported without delay in accordance with the Trust's Child Protection and Safeguarding Policy.

Staff must report safeguarding concerns immediately to the **Designated Safeguarding Lead (DSL)** or, in their absence, a Deputy DSL. Where a concern relates to the conduct of the DSL, Headteacher, a Trustee or another senior leader, the concern should be reported through the alternative reporting routes set out in this policy.

Nothing in this policy prevents any individual from making a direct referral to children's social care, the police, the **Local Authority Designated Officer (LADO)** or another relevant safeguarding agency where this is necessary to protect a child or where the individual believes a safeguarding concern has not been appropriately addressed.

5. Trust Procedure for Responding to a Whistleblowing Concern

5.1 Investigating a Concern

Upon receiving a whistleblowing concern, the recipient of the disclosure will take appropriate action to assess and investigate the matter proportionately, fairly and confidentially.

The recipient will:

- Acknowledge receipt of the concern as soon as reasonably practicable.
- Meet with the individual raising the concern where appropriate to obtain further information.
- Allow the individual to be accompanied by a trade union representative or workplace colleague where appropriate. Any companion must maintain confidentiality throughout the process.
- Make and retain an accurate record of the concern and provide a written summary to the individual where appropriate.
- Consider whether the matter falls within the scope of this policy or whether it should be addressed under another school policy or procedure.
- Consider any immediate risks and determine whether urgent action is required, including safeguarding action or referral to an external agency.
- Remind the individual of the protections available under whistleblowing legislation and this policy.

The School will assess whether there is sufficient information to warrant a formal investigation. Where appropriate, investigations may be conducted by:

- The Headteacher;
- The Chief Executive Officer;
- A member of the Senior Leadership Team;
- The Chair of Trustees;
- A Trustee with delegated responsibility; or
- An appropriately qualified independent investigator.

The School may also seek advice from legal advisers, Human Resources professionals, safeguarding specialists or other external agencies where appropriate.

Where criminal activity, safeguarding concerns or serious misconduct are suspected, the Trust may refer the matter to external agencies including the police, children's social care, **the Local Authority Designated Officer (LADO), the Disclosure and Barring Service (DBS), the Teaching Regulation Agency (TRA)** or other relevant authorities as appropriate. **Keeping**

Children Safe in Education 2026 requires concerns about poor or unsafe safeguarding practice to be addressed promptly and appropriately. [gov.uk]

The individual raising the concern will normally be informed:

- That the concern has been received;
- Whether further investigation is required;
- The broad process that will be followed; and
- An indicative timescale for updates, where this is reasonably possible.

However, the Trust may be prevented from sharing specific details where confidentiality obligations, data protection requirements, safeguarding considerations or employment processes apply.

The Trust will seek to keep the individual appropriately informed of progress throughout the investigation, whilst respecting the confidentiality and rights of all parties involved.

Safeguarding Concerns

Where a whistleblowing concern relates to safeguarding, child protection, staff conduct, unsafe recruitment practices or the welfare of a child, the matter will be considered in conjunction with the Trust's safeguarding procedures.

The Designated Safeguarding Lead (DSL) will be informed where appropriate and involved in decision-making unless the concern relates to the DSL or their actions.

Where necessary, referrals will be made without delay to:

- Children's Social Care;
- The Police;
- The Local Authority Designated Officer (LADO);
- The Disclosure and Barring Service (DBS);
- The Teaching Regulation Agency (TRA); or
- Other relevant statutory agencies.
- The welfare of children will always be the Trust's paramount consideration when responding to safeguarding-related whistleblowing concerns

Wellbeing and Support

The Trust recognises that raising or being the subject of a whistleblowing concern can be stressful. Throughout any investigation, the Trust will seek to provide appropriate support to those involved.

Where appropriate, support may include:

- Regular welfare check-ins;
- Access to employee wellbeing services;
- Signposting to counselling or professional support services;
- Access to trade union representation; and
- Appropriate workplace support measures.

The Trust will take reasonable steps to ensure that individuals who raise concerns in good faith are protected from victimisation, harassment or detrimental treatment as a result of making a disclosure.

5.2 Outcome of the Investigation

Once the investigation has been concluded, the investigating person(s) will prepare a written report summarising the findings and determining whether the concern has been upheld, partially upheld or not upheld.

The report may include:

- Details of the findings;
- Recommendations for action;
- Any lessons learned;
- Recommendations for changes to policies, procedures or practice; and
- Details of any referrals required to external agencies or regulatory bodies, where appropriate.

The person who raised the concern will be informed that the investigation has concluded and, where appropriate, will be provided with feedback on the outcome. However, the school may not be able to disclose specific details relating to disciplinary action, employment matters, safeguarding processes or other confidential information.

Where safeguarding concerns have been identified, the school will ensure that any necessary action is taken in accordance with safeguarding procedures and statutory guidance, including referrals to external agencies where required. Keeping Children Safe in Education 2026 requires schools to act promptly where safeguarding concerns are identified and to refer matters to appropriate agencies where necessary.

Following the conclusion of an investigation, the Headteacher, Trustees and other appropriate leaders will review any relevant policies, procedures, training or practices to reduce the risk of similar concerns arising in the future.

While the school cannot guarantee that the outcome will be the one sought by the individual raising the concern, it will seek to ensure that all concerns are considered fairly, proportionately and appropriately.

If an individual is dissatisfied with the way their concern has been handled, they may raise the matter with one of the alternative contacts identified in Section 4.2 or, where appropriate, with a relevant external authority or prescribed body in accordance with whistleblowing legislation.

6. Malicious or Vexatious Allegations

The school encourages all staff, volunteers and others covered by this policy to raise genuine concerns where they reasonably believe wrongdoing, misconduct, safeguarding failures or other matters of public interest may have occurred.

Where a concern is raised honestly and in good faith, no action will be taken against the individual, even if the investigation concludes that no wrongdoing has occurred.

No individual will suffer detriment, victimisation or disadvantage as a result of raising a genuine concern under this policy.

However, where an investigation finds that a concern has been knowingly raised falsely, maliciously, frivolously or for personal gain, the school may consider appropriate action. In the case of employees, this may include disciplinary action in accordance with the school's Disciplinary Policy.

The school recognises the importance of maintaining a culture in which concerns can be raised openly and will distinguish carefully between concerns raised in good faith and those which are intentionally malicious.

7. Escalating Concerns Beyond the School

The aim of this policy is to provide an internal mechanism for reporting, investigating and resolving concerns about wrongdoing, malpractice, safeguarding failures or other matters of public interest.

In most cases, individuals are encouraged to raise concerns internally in accordance with this policy. However, there may be circumstances where an individual reasonably believes that:

- Their concern has not been addressed appropriately;
- The matter is exceptionally serious;
- There is a risk of evidence being concealed;
- There is a conflict of interest;
- They may suffer detriment for raising the concern internally; or
- The concern relates to those responsible for managing the matter.

In such circumstances, concerns may be raised with an appropriate external body or regulator in accordance with whistleblowing legislation.

Depending on the nature of the concern, this may include:

- The Local Authority Designated Officer (LADO);
- Children's Social Care;
- The Police;
- The Department for Education (DfE);
- The Disclosure and Barring Service (DBS);
- The Teaching Regulation Agency (TRA);
- The Charity Commission;
- The Information Commissioner's Office (ICO);
- HM Revenue & Customs (HMRC);
- The relevant health and safety regulator; or
- Another prescribed person or regulatory body as defined by whistleblowing legislation.

Individuals are encouraged to seek advice before making an external disclosure. Independent and confidential advice is available from Protect, the UK's whistleblowing charity.

The school expects concerns to be raised responsibly and in accordance with this policy wherever possible. Disclosure to the media is unlikely to be appropriate except in the most exceptional circumstances and individuals should seek independent advice before contacting the media or publishing information publicly.

Safeguarding Concerns

In accordance with Keeping Children Safe in Education 2026, all staff have a responsibility to raise concerns about poor or unsafe safeguarding practice, failures in safeguarding arrangements, or situations where children may be at risk of harm.

Where concerns relate to safeguarding, staff may report concerns directly to:

- The Local Authority Designated Officer (LADO);
- Children's Social Care;
- The Police; or

- The NSPCC Whistleblowing Advice Line.

Nothing in this policy prevents any individual from making a referral directly to an external safeguarding agency if they believe a child is at risk of harm or that safeguarding concerns are not being addressed appropriately. Keeping Children Safe in Education 2026 makes clear that all staff should feel able to raise concerns and that such concerns should be addressed effectively. [gov.uk]

8. Protection and Support for Whistleblowers

The school recognises that individuals may feel concerned about the consequences of raising a whistleblowing concern. The school is committed to fostering a culture of openness, transparency and accountability and will support individuals who raise genuine concerns under this policy, even where those concerns are subsequently found to be unfounded.

No individual who raises a concern in good faith will suffer detriment, victimisation, harassment, discrimination or unfavourable treatment as a result of making a protected disclosure. Examples of detrimental treatment may include:

- Dismissal;
- Disciplinary action;
- Unfair treatment;
- Intimidation or threats;
- Loss of opportunities;
- Unfavourable changes to working arrangements; or
- Any form of retaliation connected with raising a concern.

Any individual who believes they have suffered detriment as a result of raising a concern under this policy should report the matter immediately to the Headteacher or, where appropriate, the Chair of Trustees.

Where concerns cannot be resolved informally, the matter may be raised through the school's Grievance Procedure.

The school will not tolerate retaliation against any individual who raises a genuine concern. Any employee found to have victimised, intimidated or retaliated against a whistleblower may be subject to disciplinary action.

Appropriate support will be offered to individuals involved in whistleblowing matters, including signposting to wellbeing support, trade union representation or other professional advice where appropriate.

9. Monitoring, Review and Approval

This policy will be reviewed annually or sooner where changes to legislation, statutory guidance, safeguarding requirements or operational needs require it. This includes updates to Keeping Children Safe in Education and other relevant safeguarding guidance.

The Board of Trustees is responsible for approving this policy and ensuring its effective implementation.

The Headteacher will be responsible for the day-to-day operation of this policy and for ensuring that all staff are aware of their responsibilities under it.

The school will monitor the effectiveness of this policy and make amendments where necessary to ensure compliance with legal, regulatory and safeguarding requirements.

10. Links with Other Policies

This policy should be read in conjunction with the following school policies and procedures:

- Child Protection and Safeguarding Policy;
- Staff Code of Conduct;
- Low-Level Concerns Policy;
- Managing Allegations Against Staff Policy;
- Safer Recruitment Policy;
- Staff Grievance Policy;
- Disciplinary Policy;
- Complaints Procedure;
- Behaviour Policy;
- Staff Induction Procedures;
- Data Protection Policy; and
- Equality Policy.

These policies support the school's commitment to maintaining high standards of safeguarding, professional conduct, governance and accountability. This policy will be reviewed annually.