



Confidential Reporting  
(Whistleblowing)



# Confidential Reporting (Whistleblowing)

Date of Policy: November 2024

Date of Next Review: November 2025

Penistone Grammar School is committed to the highest possible standards of honesty, openness and accountability and will not tolerate malpractice or wrongdoing. Employees and others who work with the school are often the first to realise that there may be something wrong. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the school. Indeed, it may also be the case that someone with a concern is not aware how best to raise concerns.

The Confidential Reporting (Whistleblowing) Policy is a vital element of the school's governance arrangements and is designed to allow those employed by the school to come forward and raise concerns of wrongdoing involving the actions of the school's employees, its governors, contractors or any aspect of the school's activities.

As such the school is committed to a policy which seeks to protect those individuals who make certain disclosures with regard to any instance of malpractice or wrongdoing and to investigate them in the public interest. It is important to stress that any concern raised through this Policy will be treated confidentially and with the utmost seriousness. This policy seeks to set out how the school will handle and respond to serious allegations of perceived wrongdoing raised by employees of the school.

A copy of this policy will be made available on the school's internal intranet; a paper copy will be provided upon request by emailing [enquiries@penistone-gs.uk](mailto:enquiries@penistone-gs.uk).

## Contents

1.	<a href="#">Aims and Scope</a>	Pg 3
	<a href="#">1.1 Safeguarding</a>	Pg 3
	<a href="#">1.2 Money Laundering</a>	Pg 3
2.	<a href="#">What is Whistleblowing?</a>	Pg 3
3.	<a href="#">How to Report a Whistleblowing Concern</a>	Pg 4
	<a href="#">3.1 Making an internal disclosure</a>	Pg 4
	<a href="#">3.2 Making a disclosure to Barnsley Metropolitan Borough Council</a>	Pg 5
	<a href="#">3.3 Making an external disclosure</a>	Pg 5
	<a href="#">3.4 Whistleblowing by members of the public</a>	Pg 5
4.	<a href="#">How the school will respond</a>	Pg 6
	<a href="#">4.1 Anonymous allegations</a>	Pg 6
5.	<a href="#">Outcomes</a>	Pg 7
6.	<a href="#">Safeguards</a>	Pg 7
	<a href="#">6.1 Confidentiality</a>	Pg 7
	<a href="#">6.2 Harassment and Victimisation</a>	Pg 8
	<a href="#">6.3 Malicious Allegations</a>	Pg 8
	<a href="#">6.4 Misuse of the Policy</a>	Pg 8
7.	<a href="#">Data Protection and Freedom of Information</a>	Pg 8
8.	<a href="#">Monitoring of Whistleblowing Complaints</a>	Pg 9



## Contents

9.	<a href="#">How the matter can be taken further</a>	Pg 9
10.	<a href="#">Training and Awareness</a>	Pg 10
11.	<a href="#">Monitoring and Review</a>	Pg 10

## Appendices

A	<a href="#">Examples of Whistleblowing</a>	Pg 11
B	<a href="#">Frequently Asked Questions</a>	Pg 12
C	<a href="#">Confidential Whistleblowing Case Record</a>	Pg 14
D	<a href="#">Seven Nolan Principles</a>	Pg 15

This policy was reviewed in **November 2024** and has been approved for implementation by the Governing Body.



## 1. Aims and Scope

The Confidential Reporting Policy seeks to cover all disclosures and allegations made by employees of Penistone Grammar School, including temporary and agency staff. It also extends to any other individuals who work for the school who want to raise an allegation of perceived wrongdoing, including consultants, contractors and sub-contractors who are engaged in work for the school.

The policy seeks to:

- Support the culture of zero tolerance toward fraud and corruption and deter wrongdoing;
- encourage employees and others with serious concerns about any aspect of the school's work to feel confident to come forward and voice those concerns;
- facilitate raising concerns at an early stage and in the right way ensuring that critical information gets to the people who need to know and who are able to take action;
- provide safeguards to reassure those who raise concerns in the public interest and not maliciously or for personal gain, that they can do so without fear of reprisals or victimisation or disciplinary action, regardless of whether these are subsequently proven;
- set out how the school will respond to allegations made and provide feedback to the whistleblower on any action taken;
- ensure that employees know what to do if they are not satisfied with actions taken.

The Confidential Reporting Policy is not to be used where other more appropriate internal reporting procedures are available. There are existing school procedures which enable employees to lodge a grievance relating to their conditions of employment, raise matters of harassment or to make a general complaint, which by contrast, generally have no additional public interest dimension.

Further guidance explaining the difference between whistleblowing and making a complaint is shown at Appendix B - Frequently Asked Questions.

This Confidential Reporting Policy covers concerns that fall outside the scope of those existing internal procedures. The school will investigate under the confidential reporting (whistleblowing) process, any allegations made through the above procedures, which raise serious concerns over wrongdoing.

### 1.1 Safeguarding

Any concerns relating to a child protection issue or the abuse or neglect of an adult should be reported in line with the specific guidelines outlined within the school's Safeguarding Policy, and published on the Barnsley Metropolitan Borough Council website:

- [Safeguarding Children](#)
- [Safeguarding Adults](#)

### 1.2 Money Laundering

Any individuals who are raising concerns relating to money laundering offences or Proceeds of Crime Act 2002 are required to report these concerns directly to the Money Laundering Reporting Officer (MLRO) for Barnsley Metropolitan Borough Council, in line with the Anti Money Laundering Policy.

## 2. What is Whistleblowing?

Whistleblowing is generally the term used when someone who is employed in an organisation reports a concern about suspected wrongdoing, malpractice, illegality or risk in the workplace. It is the confidential disclosure by an employee, of any concerns relating to a perceived wrongdoing involving any aspect of the school's work or those who work for the school. The whistleblowing process assists individuals, who believe they have discovered malpractice, impropriety or wrongdoing, to raise a concern, in order that this can be addressed. Examples of wrongdoing are shown at Appendix A.



The **Public Interest Disclosure Act 1998 (PIDA)** is known as the Whistleblowing law and is designed to encourage and enable employees to “speak out” and to report suspected wrongdoing at work. This is commonly known as “blowing the whistle”.

The **Enterprise and Regulatory Reform Act 2013** introduced a public interest test in relation to whistleblowing. This ensures that, to benefit from protection, whistleblowing claims must satisfy a public interest test and disclosures which can be characterised as being of a personal rather than a public interest will not be protected. This legislation legally protects employees from any detriment from their employer or colleagues that arises as a result of making a “protected disclosure” (a qualifying disclosure) in the public interest. This includes protection from harassment, victimisation or dismissal by their employer.

In making a protected disclosure the employee must:

- reasonably believe that the disclosure they are making is in the public interest;
- reasonably believe that the information detailed and any allegations in it are substantially true; and
- the matter disclosed must fall within the matters prescribed for that regulator

A disclosure of information is not a protected disclosure if, by making the disclosure, the worker commits an offence such as breaching the Official Secrets Act or Misconduct in public Office.

Whilst protection under PIDA covers employees and most workers it is not extended to partners, non-executive directors, volunteers or the self-employed. However, the principles outlined in this policy, as far as they can be, will be applied to whistleblowing allegations received from sources other than employees of the school. As with internally reported cases, particular consideration needs to be given to matters of confidentiality.

### 3. How to Report a Whistleblowing Concern

#### 3.1 Making an internal disclosure

It is the hope and intention of the school that any employee with a concern about any aspect of the school’s operations or its conduct, feels able to first raise those concerns internally through its line management structures.

The earlier an employee expresses a concern, the easier it will be to take action. Employees should raise a concern as soon they have a reasonable suspicion but are not expected to investigate the concern themselves to prove their suspicions are well-founded. Providing genuine concerns are being raised it does not matter if the employee is mistaken.

Concerns should preferably be made in writing. However, raising a concern verbally also counts as whistleblowing. Wherever possible, the information provided should include the background and history of the concern, provide names, dates and places where possible, and the reason why the individual is particularly concerned about the situation.

In accordance with financial regulations all concerns relating to a perceived wrongdoing (as per Appendix A) which are referred to line managers must be reported on receipt to the Head of Internal Audit, Anti-Fraud and Assurance for Barnsley Metropolitan Borough Council. This may be done by the Whistleblower, the receiving line manager, the Principal, the Chair of Governors or the Investigating Officer investigating the allegations.

Alternatively, any school who has a concern relating to the school can report the suspected wrongdoing to:

- The Principal (or to the Vice Principals/Associate Vice Principals or Director of Business Development) if the concern relates to someone with whom the Principal has a declared or perceived conflict of interest).
- To the Chair of Governors if the concern relates to the Principal.
- To the Chair of Governors if the concern relates to members of the Governing Body.
- To the Principal if the concern relates to the Chair of Governors.



Should an employee wish to speak to someone of a specified gender in relation to a concern, this will be arranged.

Any person reporting a concern should provide as much information as possible, including:

- who the allegations are against;
- details of the nature of the alleged wrongdoing;
- dates, places and amounts where possible;
- provide or highlight any evidence they have in support of the allegation;
- state if the person making the disclosure is an employee of the Council;
- If not, does the person work in a school;
- name and contact details (unless they wish to remain anonymous).

Employees and governors who are raising a concern are not permitted to undertake their own investigations, surveillance or to interview or visit any witnesses, as this could jeopardise a formal investigation.

Following reporting a concern, the Principal or Chair of Governors will appoint an Investigating Officer who is not named in the concern, and who has had no prior dealings with, or information about the concern, to gather as much information as possible about the concerns raised.

The school recognises that employees may wish to seek advice from their trade union and indeed may invite their trade union (or professional association) to raise a matter on their behalf.

### **3.2 Making a disclosure to Barnsley Metropolitan Borough Council**

Employees are encouraged, wherever possible, to raise a concern directly with the school in the first instance. If for any reason, this isn't considered appropriate, as Penistone Grammar School is a Local Authority maintained school, employees are able to raise a concern directly with BMBC.

To do this, employees can contact one of the Local Authority's Whistleblowing Officers:

Rob Winter, Head of Internal Audit, Anti-Fraud and Assurance  
Barnsley Metropolitan Borough Council  
PO Box 320, Barnsley, S70 2YL  
Telephone 07786 525319  
Email [WB01RWinter@barnsley.gov.uk](mailto:WB01RWinter@barnsley.gov.uk)

Wendy Popplewell, Executive Director Core Services  
Barnsley Metropolitan Borough Council  
PO Box 320, Barnsley, S70 2YL  
Telephone 01226 775799  
Email [WB02WPopplewell@barnsley.gov.uk](mailto:WB02WPopplewell@barnsley.gov.uk)

Please note that should an employee wish to speak to a female officer, this can be arranged through the Whistleblowing Officers

### **3.3 Making an external disclosure to a prescribed person**

A prescribed person is someone identified in regulations who is independent of the employee's organisation, but usually has an authoritative relationship with the organisation, such as a regulatory or legislative body.

The link below shows a list of other 'prescribed regulators' to whom a protected disclosure can be made: [Whistleblowing: list of prescribed people and bodies - GOV.UK](#).

### **3.4 Whistleblowing by members of the public**



Members of the public can still contact the school to report any concerns or disclosures over wrongdoing by writing to the Principal, or to the Chair of Governors via the Clerk to the Governing Body.

Allegations or concerns received from members of the public will be treated in the same way. However, unlike disclosures made by employees, protection under the Public Interest Disclosure Act (PIDA) does not extend to disclosures made by members of the public.

#### 4. How the School will Respond

The school will endeavour to formally respond to acknowledge receipt of a disclosure within 5 working days of the concern being received.

A further acknowledgement will be sent within 10 working days to include:

- How the school proposes to deal with the matter, and the policy under which it will be investigated.
- Whether the school considers it to be a protected disclosure.
- Contact details for the Investigating Officer leading the investigation.
- Arrangements for confidentiality.
- An estimate of how long it will take to provide a response on the outcome.
- Any initial enquiries which may have been made.
- If no action is planned, why this is the case.

The action taken by the school will depend on the nature of the concern. To protect individuals and the school, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations that fall within the scope of specific procedures (for example, child protection, disciplinary or discrimination issues) will normally be referred for consideration under those procedures. The matters raised will be investigated internally to establish basic facts. At that stage a decision will be made on whether:

- To complete the investigation internally; or
- to refer the matter to the Local Authority; or
- to refer the matter directly to the Policy; or
- to organise an independent inquiry; or
- to take no action.

All proposed action will be notified to and agreed by the Principal and/or the Chair of Governors. Actions will also be notified to and agreed by BMBC's Head of Internal Audit, Anti-Fraud and Assurance where appropriate.

All allegations will be handled confidentially and discreetly by those managers who are directly involved in the investigating process. The ongoing point of contact for the whistleblower will be given in the acknowledgement letter.

If necessary, further information will be sought from the whistleblower. This will depend on the nature of the matters raised, the potential difficulties involved in conducting an investigation, and the clarity of the information provided.

At any meeting arranged to discuss an employee's concerns the employee has the right, if they so wish, to be accompanied by their Trade Union representative, work colleague or a friend who is not involved in the area to which the concern relates. Initial contact with the employee(s) may be outside of the workplace to protect their identity and, if necessary and mutually acceptable, subsequent meetings may be held away from work and/or outside normal working hours.

Where possible the identity of the person raising the concern will not be divulged during the investigation. Enquiries may be appropriate to ensure that the whistleblower is not themselves subject to any disciplinary proceedings that may undermine the public interest motive for raising a concern.





The school will do what it lawfully can to minimise any difficulties that an employee may experience as a result of raising a concern. For example, if an employee is required to give evidence in criminal or disciplinary proceedings, the school will advise the employee about the procedures in terms of what will happen and what will be expected of them.

#### **4.1 Anonymous Allegations**

The school recognises that there may be circumstances where individuals are worried about being identified when they report concerns about their employer. Concerns expressed anonymously are more difficult to investigate, and harder to substantiate, and further liaison with the whistleblower is not possible. It is also difficult for an anonymous whistleblower to be protected by the law if they subsequently suffer detrimental treatment.

Both anonymous allegations and named referrals which include contact details are treated seriously and are considered on the basis of individual merits. Factors that will be taken into consideration when assessing allegations will include:

- The seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of confirming the allegations from attributable sources.

## **5. Outcomes**

The school will, subject to legal constraints, seek to advise the whistleblower on the outcomes of the investigation in order to assure them that that the matter has been properly addressed. The school will not usually provide the whistleblower with all the details of the investigation outcomes as this could breach others' rights to confidentiality (for example; if disciplinary action has been taken against an individual).

Some concerns raised may be resolved by agreed action, once the whistleblower's concerns have been explained, without the need for investigation.

As all concerns are considered on an individual basis it is possible that a full investigation report is not required for all cases. However, for internal audit purposes, the school will be required to record confirmation of the outcome of the referral/investigation and any system or control risk issues which arise from it.

In the event that an investigation report is deemed appropriate, the report will usually be issued by the Investigating Officer to the Principal and/or Chair of the Governing Body and where appropriate, to the Director of Finance (Section 151 Officer) at BMBC. Reporting is restricted as the content of investigation reports could include personal information of others, commercially sensitive information or details of investigation processes and practices the publication of which could prejudice the effective conduct of future investigations.

## **6. Safeguards**

In order to ensure that allegations are investigated in the right spirit with the right outcome, the following safeguards or principles should be applied in all cases.

### **6.1 Confidentiality**

The school's Confidential Reporting Policy seeks to protect the identity of the individual making a disclosure wherever possible.

Records of employee disclosures held by the school are stored securely. Access to whistleblowing and related investigation records are restricted to the investigating officers assigned to examine the concerns being raised. Wherever possible the identity of an employee raising a concern will not be revealed as part of an investigation. Should this not be possible the employee will be notified and consent will be sought beforehand.





Certain disclosures, including those relating to a child at risk or abuse of a vulnerable adult, override the employee's request for confidentiality. The school is required to investigate these matters under separate procedures which take priority over any request for confidentiality.

The school cannot guarantee to protect the identity of an employee raising allegations of serious wrongdoing where a criminal offence has been committed, and legal/prosecution action results from the disclosure. In some cases an employee may have to act as a witness and/or provide evidence in relation to offences which are referred to the Police.

## **6.2 Harassment and Victimisation**

The school acknowledges that the decision to report a concern can be a difficult decision for an employee to take, not least because of the fear of reprisal from those responsible for the malpractice. It is unlawful for an employee to suffer victimisation or harassment for whistleblowing.

The school will not tolerate harassment or victimisation against an employee who has raised a genuine concern under the Confidential Reporting Policy. Victimisation may include an attempt to identify the person raising the concern. Any employee who victimises a whistleblower will be subject to disciplinary action which may lead to dismissal. An individual may also be personally liable for treating a colleague detrimentally on the grounds that they have raised public interest concerns.

The Principal and the governing body should monitor how identifiable whistleblowers are subsequently treated after raising a matter of concern. They should ensure that any harassment or victimisation is dealt with under disciplinary arrangements.

Any employee who believes they have been victimised as a result of making a disclosure or blowing the whistle should report their concerns to the Principal or Chair of Governors.

## **6.3 Malicious Allegations**

While encouraging employees to bring forward matters of concern, the school must guard against claims which are malicious. This is because of the risk of claims made to deliberately damage the reputation of other employees, or the school as a whole, and not least because the cost of undertaking investigations is significant.

If an employee makes an allegation which they reasonably believe is a whistleblowing concern, but it is not confirmed by the investigation, no action will be considered or taken against them. However, if an employee makes false, malicious or vexatious allegations this will be treated as a serious disciplinary offence and disciplinary action will be taken. The PIDA only offers protection from dismissal or detriment if the worker reasonably believes their disclosure was made in the public interest.

## **6.4 Misuse of the Policy**

The Confidential Reporting (Whistleblowing) Policy is not designed to allow:

- Individuals who have acted inappropriately to escape punishment by highlighting any malpractices they were involved in.
- Employment protection in relation to a redundancy situation or pre-existing disciplinary issues as a result of reporting a wrongdoing.
- An individual to raise a concern for some private or personal motive.

## **7. Data Protection and Freedom of Information**

The Freedom of Information Act 2000 gives a general right of access to all types of recorded information held by public authorities. As such the school often receives requests for information under the Freedom of Information Act.



The school has a legal obligation to provide the information unless it falls under one of the exemptions of the Act.

The Freedom of Information Act contains exemptions which may be applicable to permit the withholding of information identifying the whistleblower, including:

- Section 40: Personal Data.
- Section 41: Information which, if disclosed, would give rise to an actionable breach of confidence.

Many people making a disclosure to the school will wish to protect their identity and the school will always seek to protect the identity of individuals during the course of an investigation. If the school receives a request for information identifying a whistleblower, the school will contact the whistleblower to seek their views beforehand and will, wherever possible, seek to comply with those views.

The principle of maintaining confidentiality should also be applied to the identity of any individual who may be the subject of a disclosure.

When processing personal data as part of a whistleblowing investigation, the school will take all necessary precautions to protect such data and not share it more widely than is necessary as part of the investigation. The school will apply the General Data Protection Regulations and the Data Protection Act 2018 in all aspects of any whistleblowing investigation.

## 8. Monitoring of Whistleblowing Complaints

The governing body will maintain a central record of all whistleblowing referrals made under this policy and monitor the outcome of these cases. The collection, monitoring, review and storage of these records will at all times be carried out within the safeguarding principles set out at Section 6 of this policy.

The school will also report details of any allegation to Barnsley Metropolitan Borough Council's Head of Internal Audit, Anti-Fraud and Assurance, who will log and allocate each case a reference number whether or not Internal Audit are involved in the investigation work. The outcome of the investigation will be notified to the Head of Internal Audit by the school.

The records held by the governing body will be used to analyse the impact and effectiveness of the arrangements in place in statistical terms.

The governing body has overall responsibility for the maintenance and operation of this policy. In accordance with its Terms of Reference for the oversight of the governance framework for the school, and this is carried out in line with the expectations and requirements set down by Barnsley Metropolitan Borough Council in terms of arrangements for governance for locally maintained schools. The governing body will review this policy and consider its effectiveness through a process of periodic review.

A Confidential Reporting (Whistleblowing) record sheet (Appendix C) should be used to record a summary for each case.

## 9. How the matter can be taken further

This policy is intended to provide employees with an avenue to raise concerns within the school and be satisfied with the school's response. However, should an employee feel dissatisfied with the school's response, and feels it is right to take the matter further outside the school, they can do so. Contact can be made through one of the following contact points:

- The Local Authority's Whistleblowing Officers:
  - Rob Winter, Head of Internal Audit, Anti-Fraud and Assurance  
Barnsley Metropolitan Borough Council  
PO Box 320, Barnsley, S70 2YL  
Telephone 07786 525319



- Email [WB01RWinter@barnsley.gov.uk](mailto:WB01RWinter@barnsley.gov.uk)
- Wendy Popplewell, Executive Director Core Services  
Barnsley Metropolitan Borough Council  
PO Box 320, Barnsley, S70 2YL  
Telephone 01226 775799  
Email [WB02WPopplewell@barnsley.gov.uk](mailto:WB02WPopplewell@barnsley.gov.uk)
- The relevant professional bodies or regulatory organisation
  - The whistleblowing charity 'Protect'
  - Trade Union
  - A solicitor
  - The police

It should be remembered that failing to raise the matter within the school first may result in the disclosure being unprotected within the provisions of the Public Disclosure Act 1998.

Employees who are in doubt regarding the provisions of the policy should contact Human Resources. Advice as to whether or how a matter should be raised should be sought by contacting the Principal\*\* or the Chair of Governors.

*\* Protect can also be contacted should someone wish to seek independent advice about how to raise a concern (appendix B – Frequently Asked Questions, provides the contact details). Seeking this independent advice would not constitute legal notification to the school.*

*\*\* Or a Vice Principal/Executive Director in the event that the concern relates to someone with whom the Principal has a declared or perceived conflict.*

## 10. Training and Awareness

The Principal and governing body are responsible for ensuring that their employees are aware of the Confidential Reporting Policy and process and that any training needs are addressed which may arise from the application of the policy. Raising awareness of the school's Confidential Reporting Policy will form part of the induction training for all employees and will be addressed as refresher training for all employees annually.

Employees have a responsibility to ensure that they are aware of and understand the school's policy in relation to whistleblowing.

## 11. Monitoring and Review

This policy will be reviewed on an annual basis, or when new legislation or guidance regarding the subject is published and requires the approval of the full governing body as it cannot be delegated to a committee.

The next scheduled review date will be in November 2025.



Concerns around suspected wrongdoing, malpractice, illegality or risk in the workplace may include:

- Criminal offences (actual or potential).
- Failure to comply with a legal duty.
- Miscarriages of justice.
- Fraud or corruption.
- A misuse or theft of school money, physical assets or the abuse of working arrangements.
- Abuse of authority/position.
- Serious breaches of school policy or procedure, including but not limited to the Local Authority's School Financial Regulations, Contract Standing Orders, Corporate Anti-Bribery Policy, Recruitment Procedures.
- A misuse or abuse of the school's computers, its systems, data or information.
- Unethical conduct and actions deemed unprofessional or inappropriate (this could include, but is not limited to, the malpractice in dealing with or mistreatment of a student or other stakeholder of the school; breaches of regulations requiring school governors to 'act with integrity, objectivity and honesty and in the best interests of the school' and breaches of the 'Nolan Principles' which are the basis of ethical standards expected of public office holders (Appendix D).
- The health and safety of any individual has been, or is likely to be, endangered.
- The environment has been, is being or is likely to be, damaged (as a result of the school's actions or inactions).
- Information about any of the above has been, is being, or is likely to be, deliberately concealed.

### What is the difference between whistleblowing and making a complaint or grievance?

In general terms, whistleblowing occurs when an employee raises a concern about danger or illegality that affects others and which has a public interest dimension to it. The person blowing the whistle is usually not directly, personally affected by the danger or illegality. Consequently, the whistleblower rarely has a personal interest in the outcome of any investigation into their concerns. As a result, the whistleblower should not be expected to prove their case; rather he or she raises the concern so others can address it.

A grievance or private complaint is, by contrast, a dispute about the employee's own employment position and has no additional public interest dimension. When someone complains, they are saying that they have personally been poorly treated. This poor treatment could involve a breach of their individual employment rights or bullying, and the complainant is seeking redress or justice for themselves. The person making the complaint therefore has a vested interest in the outcome of the complaint, and, for this reason, is expected to be able to prove their case.

For example – bullying and discrimination issues should be dealt with under the respective policy or under grievance procedure

### Can concerns be raised confidentially or anonymously?

The school encourages whistleblowers to identify themselves and raise concerns openly. Openness makes it easier for the school to assess the issue, work out how to investigate the matter, understand any motive and get more information. The effectiveness of any whistleblowing investigation may be limited where an individual chooses not to be identified.

An individual raises a concern confidentially if he or she gives his or her name on the condition that it is not revealed without their consent. An individual raises a concern anonymously if he or she does not give his or her name at all. Clearly, if the school does not know who provided the information, it is not possible to reassure or protect them.

### Does the Public Interest Disclosure Act (PIDA) require an employer to keep a whistleblower's identity secret?

The simple answer is no. PIDA contains no specific provision for confidentiality. The protections within the Act can be deemed to encourage employees to raise issues openly. A good whistleblowing policy will provide a confidential port of call for a worried employee and employers should respect any promise of confidentiality they make. However, in some cases it will be impossible to take action on the concern without the open testimony of a whistleblower. Further it may later become necessary to waiver anonymity because of the course of the investigation for example if the matter has had to be referred to the police.

### Am I protected from dismissal if I blow the whistle?

It is unlawful to dismiss an employee for the reason that they have blown the whistle. This would be an unfair dismissal. As long as disclosures meet the legal tests an employee should not be dismissed for raising concerns.

The types of whistleblowing eligible for protection as qualifying disclosures are provided at Appendix A.

### Who is protected?

The following people are protected:

- Employees
- Agency workers
- People who are training with an employer but not employed



A worker will be eligible for protection if:

- They honestly think what they are reporting is true
- They are telling the right person
- They believe that their disclosure is in the public interest

#### Who is not protected?

An employee will not be afforded protection if:

- They break the law when they report something for example because they signed the Official Secrets Act
- They were part of the wrongdoing
- They found out about the wrongdoing when someone wanted legal advice ('legal professional privilege'), for example if they are a solicitor
- It is not in the public interest

Workers who are not employees cannot claim unfair dismissal because of whistleblowing, but they are protected and can claim 'detrimental treatment'.

#### What information should a whistleblower provide?

Supporting evidence for the allegations, if available, is clearly helpful. However, the law does not require individuals to have evidence before reporting the matter, but it does say that the individual must reasonably believe the information is substantially true.

Individuals should report concerns to line management or other at the earliest opportunity rather than wait to collate any evidence.

Whistleblowers are encouraged to provide their contact details to allow the school to seek further information, where necessary and advise on outcomes.

#### Where can I get independent advice?

Free, independent, confidential advice and information about PIDA law can be obtained from the Whistleblowing Charity 'Protect' (formally Public Concern at Work). The charity runs a UK helpline on their advice line tel: 020 3117 2520 or visit their website [www.protect-advice.org.uk](http://www.protect-advice.org.uk).



<b>CONFIDENTIAL</b>					
Penistone Grammar School Confidential Reporting (Whistleblowing) Case Record					
Date the concern or allegation was received					
Details of person receiving the referral	Name:	Job title:		Contact details:	
How was the report received	Verbal		Written		Other (specify)
Does the individual wish to remain anonymous?	Yes			No	
If not, details of employee raising concern/allegation	Name:	Job title:		Contact details:	
Was confidentiality requested, explained or promised?	Yes			No	
A summary of the concern/allegation raised.					
Has the employee received formal acknowledgement in line the policy?	Yes	No	Has the employee received further acknowledgement in line the policy?	Yes	No
Date reported (if applicable)	Principal		Chair of Governors	Internal Audit	
Details of appointed Investigating Officer	Name:		Job title:		Contact details:
Summary of outcome of investigation	Proven		Not Proven	Action Plan	Recommendations
Date notification of outcome provided to the employee raising the concern/allegation					
Papers retained (location), responsible officer and review date					



The following are the Seven Nolan Principles underpinning standards for Public Life:

The principles of public life apply to anyone who works as a public office-holder. This includes all those who are elected or appointed to public office, nationally and locally, and all people appointed to work in the civil service, local government, the police, courts and probation services and in the health, education, social and care services.

All public office-holders are both servants of the public and stewards of public services. The principles also have application to all those in other sectors delivering public services.

1. **Selflessness:** Holders of public office should act solely in terms of the public interest.
2. **Integrity:** Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.
3. **Objectivity:** Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
4. **Accountability:** Holders of public office are accountable to the public for their decisions and actions and must admit themselves to the scrutiny necessary to ensure this.
5. **Openness:** Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
6. **Honesty:** Holders of public office should be truthful.
7. **Leadership:** Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

**Source:** The Committees website is at <http://www.public-standards.gov.uk/>

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