



BROADHURST
SCHOOL

Broadhurst School

WHISTLEBLOWING POLICY

Policy date	October 2026
Review date	October 2027
Headteacher	Mrs Paula Flindell
Proprietor	Mr Brian Berkery

This policy has been updated for the October 2026 review and reflects current whistleblowing guidance, Keeping Children Safe in Education 2026, the 2026 whistleblowing protection for sexual harassment, and current Camden safeguarding contacts and arrangements.

1. Purpose and status

This policy explains how concerns about wrongdoing, malpractice, unsafe practice, fraud, breaches of legal or regulatory requirements, or failures in safeguarding may be raised at Broadhurst School. It is intended to support a culture in which concerns are raised promptly, taken seriously and dealt with fairly and confidentially.

The policy applies to school employees and, where relevant, agency workers, contractors, volunteers and other workers who undertake work for the School. It should be read alongside the Safeguarding and Child Protection Policy, Staff Code of Conduct, Complaints Policy, Grievance Procedure, Disciplinary Procedure and relevant health and safety arrangements.

2. What is whistleblowing?

Whistleblowing is the reporting of information about wrongdoing in the public interest. A worker may make a protected disclosure where the statutory conditions are met. A worker does not have to prove that wrongdoing has occurred; the relevant test is whether they reasonably believe that the disclosure is in the public interest and tends to show specified wrongdoing.

The School will not tolerate retaliation, victimisation or detriment because a worker has raised a genuine concern through an appropriate route. Protection may apply even where an investigation does not substantiate the concern, provided the disclosure was made in accordance with the law.

From 6 April 2026, sexual harassment is expressly included within the categories of wrongdoing that can form the subject of a protected whistleblowing disclosure under the Employment Rights Act 1996, as amended by the Employment Rights Act 2025.



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3. Matters that may be raised

Examples include:

- criminal offences or suspected criminal conduct
- breach of a legal or regulatory obligation
- miscarriage of justice
- danger to the health or safety of any person
- damage to the environment
- fraud, corruption, financial impropriety or misuse of funds
- maladministration, serious malpractice or abuse of authority
- serious failures in safeguarding or child protection arrangements
- sexual harassment where the statutory whistleblowing conditions are met
- unlawful discrimination, racist incidents or harassment where the matter amounts to qualifying wrongdoing
- serious breaches of school policies or procedures where these indicate wider wrongdoing or a public interest issue
- deliberate concealment or attempted concealment of any of the above

4. Matters that should normally use another procedure

Whistleblowing is not normally the correct procedure for a personal employment grievance, disagreement about an individual employment decision, or a complaint that affects only the person raising it. Such matters should normally be dealt with under the School's Grievance Procedure or another relevant procedure.

Where a concern contains both a personal grievance and information indicating wider wrongdoing or a public-interest issue, the School will consider whether the whistleblowing procedure should also apply.

5. Safeguarding and child protection concerns

Safeguarding is everyone's responsibility. Any concern about a child's safety or welfare, or an allegation about an adult working with children, must be acted on without delay and in accordance with the School's Safeguarding and Child Protection Policy and Keeping Children Safe in Education 2026.

The Designated Safeguarding Lead (DSL) is Mrs Paula Flindell, Headteacher. Staff should report safeguarding concerns to the DSL or the Deputy DSL identified in the current Safeguarding and Child Protection Policy. If the concern relates to the DSL, or the person receiving the concern is implicated, the concern must be escalated to the Proprietor and/or an appropriate external safeguarding authority.

An allegation about a member of staff, volunteer, contractor or other person working with children that may meet the LADO threshold must be referred to the Camden Local Authority Designated Officer (LADO) in



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accordance with Camden safeguarding procedures. The LADO is not the School's disciplinary investigator; the School remains responsible for appropriate employment action, subject to safeguarding and statutory processes.

6. How to raise a concern internally

In the first instance, concerns should normally be raised with the Headteacher, Mrs Paula Flindell, preferably in writing where practical. A concern may also be raised with the Headteacher's Deputy or another senior leader where appropriate.

If the concern relates to the Headteacher, or the person raising the concern reasonably believes that the Headteacher cannot deal with it impartially, the concern should be raised directly with the Proprietor, Mr Brian Berkery.

If the concern relates to the Proprietor, or the worker cannot reasonably use an internal route, the worker may use an appropriate external route listed in this policy.

The person receiving a disclosure should acknowledge it promptly, preserve relevant information and ensure that the concern is assessed and investigated or referred to the appropriate authority. Confidentiality should be maintained on a need-to-know basis.

7. What to include in a disclosure

Where possible, the person raising a concern should provide: the nature of the concern; relevant dates, places and people; what is believed to have happened; why the matter is believed to be in the public interest; any supporting documents or evidence; and whether the concern has already been raised elsewhere.

A worker does not need to investigate the matter personally. The School is responsible for deciding what investigation, referral or other action is appropriate.

8. Anonymous disclosures and confidentiality

The School will consider anonymous disclosures wherever possible. However, anonymity can make investigation and protection more difficult, particularly if clarification or further evidence is required.

The identity of a whistleblower will be kept confidential as far as reasonably practicable and lawful. Confidentiality cannot be guaranteed where disclosure is required by law, necessary for a fair investigation, or required by a safeguarding, regulatory, police or other statutory process.



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9. Investigation and outcome

Concerns will be assessed promptly and investigated proportionately. The School may appoint an investigator who is independent of the matter. A worker may be accompanied at an investigation meeting by a trade union representative, professional association representative or appropriate workplace colleague, where permitted by the relevant procedure.

The School will keep appropriate records of the concern, decisions, actions and outcome. Subject to legal and confidentiality restrictions, the person who raised the concern will be informed of the outcome or the action taken. The School may be unable to provide details about disciplinary or confidential action taken against another individual.

If a concern identifies possible criminal conduct, serious safeguarding risk, regulatory non-compliance, fraud or other matter requiring external action, the School may refer it to the police, local authority, Department for Education, Ofsted or another relevant prescribed person/body.

10. Protection from detriment and victimisation

No worker will be subjected to dismissal, detriment, harassment or victimisation because they have made a protected disclosure in accordance with the law. Any retaliation against a worker for raising a genuine concern will be treated seriously and may itself be a disciplinary matter.

A worker who makes a disclosure that is not substantiated will not be penalised merely because the concern was not proven, provided it was raised in good faith and with a reasonable belief that the relevant conditions were met. Deliberately false, malicious or knowingly misleading allegations may be dealt with under the Disciplinary Procedure.

11. External safeguarding and whistleblowing routes – Camden and London

Camden Local Authority Designated Officer (LADO) – for allegations concerning people who work with children where the LADO threshold may be met:

Designated LADO: Jacqueline Fearon

Telephone: 020 7974 4556

Email: LADO@camden.gov.uk

Address: 5 Pancras Square, London N1C 4AG

Camden Children and Families Contact Service / MASH – for safeguarding concerns about a child:



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Telephone: 020 7974 3317 (office hours)

Out of hours: 020 7974 4444

Camden Safeguarding Children Partnership (CSCP): 020 7974 8752

Email: CSCP@camden.gov.uk

For an immediate emergency or where a child is in immediate danger, call 999.

The School will follow current Camden Safeguarding Children Partnership procedures and the London safeguarding arrangements when making safeguarding referrals.

12. National external routes

NSPCC Whistleblowing Advice Line: 0800 028 0285; help@nspcc.org.uk. This is a national advice route for people working in education and children's services who have concerns about how child protection issues are being handled.

Ofsted whistleblowing: 0300 123 3155; whistleblowing@ofsted.gov.uk. Ofsted is a prescribed body for specified matters within its remit. The Department for Education is also a prescribed person for matters relating to independent schools.

Department for Education: workers may make disclosures to DfE where the matter falls within its prescribed remit. Current government guidance should be checked before making an external disclosure.

Protect (whistleblowing advice): an independent whistleblowing charity providing confidential advice.
Website: <https://protect-advice.org.uk/>

Other relevant prescribed bodies may include the Information Commissioner's Office, Health and Safety Executive, HM Revenue & Customs, Environment Agency, Financial Conduct Authority and other regulators, depending on the subject matter.

13. Principles for managers and leaders

Anyone receiving a concern must: take it seriously; avoid promising absolute confidentiality; consider immediate safeguarding, health and safety or evidence-preservation needs; record the concern; escalate to the appropriate senior person; obtain advice where necessary; avoid prejudging the allegation; protect the worker from retaliation; and consider whether an external referral is required.

Managers must not instruct a worker to suppress, withdraw or conceal a legitimate concern. An instruction to cover up wrongdoing should itself be escalated.



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14. Review and monitoring

This policy will be reviewed annually and sooner where there is a significant change in law, statutory guidance, safeguarding arrangements, regulatory requirements or Camden local safeguarding procedures. The Headteacher and Proprietor are responsible for ensuring that staff are made aware of the policy and relevant reporting routes.

15. Key Contacts and Reference Sources

School: Mrs Paula Flindell, Headteacher and DSL – Internal first point of contact

School: Mr Brian Berkery, Proprietor – Escalation where the Headteacher is involved or cannot act impartially

Camden LADO: Jacqueline Fearon – 020 7974 4556 – LADO@camden.gov.uk – Allegations concerning people working with children

Camden Children & Families Contact / MASH: 020 7974 3317; out of hours 020 7974 4444 – Safeguarding concerns about a child

Camden Safeguarding Children Partnership: 020 7974 8752 – CSCP@camden.gov.uk – Local safeguarding partnership information and arrangements

NSPCC Whistleblowing Advice Line: 0800 028 0285 – help@nspcc.org.uk – Advice where child protection concerns cannot be raised safely or effectively internally

Ofsted: 0300 123 3155 – whistleblowing@ofsted.gov.uk – Whistleblowing matters within Ofsted's prescribed remit

Department for Education: 0370 000 2288 / GOV.UK contact routes – Whistleblowing matters within DfE's prescribed remit

Protect: <https://protect-advice.org.uk/> – Independent whistleblowing advice

Emergency: 999 – Immediate danger / emergency

Current guidance used for this review

GOV.UK – Whistleblowing guidance for workers: <https://www.gov.uk/guidance/whistleblowingguidance-for-workers>

GOV.UK – Whistleblowing guidance for employers:
<https://www.gov.uk/guidance/whistleblowingguidance-for-employers>



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GOV.UK – Whistleblowing: prescribed people and bodies:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies-2/whistleblowing-list-of-prescribed-people-and-bodies>

GOV.UK – Keeping Children Safe in Education 2026:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Camden Safeguarding Children Partnership – LADO:

<https://cscp.org.uk/professionals/managingallegations-against-staff-and-volunteers-lado/>

Camden Council – Are you worried about a child?: <https://www.camden.gov.uk/are-you-worried-about-a-child>

Important: External contacts and local procedures can change. The Headteacher should check the current Camden Safeguarding Children Partnership and GOV.UK pages when a referral is required, rather than relying on an old printed contact list.

Headteacher: Mrs Paula Flindell Date: _____