

# Daffodil Grammar School for Girls

## Whistleblowing Policy

**School address:** 163 Commercial Road, London, E1 2DA

**Proprietor:** ASM Anisuzzaman

**Headteacher:** Mr Stephen Montford

### 1. Status and purpose of this policy

This policy sets out the formal arrangements by which workers at Daffodil Grammar School for Girls may raise concerns about wrongdoing, malpractice, illegality, unsafe practice, professional misconduct, financial impropriety, failures in governance, and safeguarding failures, including where those concerns relate to senior leaders or the proprietor.

The school is committed to a culture of integrity, openness, accountability and lawful conduct. No school can claim to be safe or well led if staff are frightened to raise concerns or believe that speaking up will lead to retaliation, isolation or damage to their career. This policy therefore exists to ensure that concerns which are in the public interest are raised promptly, heard properly, investigated fairly, and acted upon decisively.

The school recognises that whistleblowing is distinct from a personal grievance. A grievance usually concerns the worker's own employment position, treatment, contractual terms or working relationship. Whistleblowing concerns wrongdoing that affects, or may affect, others, the organisation, children, public funds, compliance with the law, or the integrity of the school's leadership and systems. The government's current whistleblowing guidance states that whistleblowing concerns reporting wrongdoing "in the public interest" and that workers are protected when they make qualifying disclosures about specified types of wrongdoing. ([GOV.UK](https://www.gov.uk/guidance/whistleblowing))

This policy is written for an independent school and should be read alongside the school's Safeguarding and Child Protection Policy, Staff Code of Conduct, Low-Level Concerns procedure, Allegations Against Staff procedure, Complaints Policy, Safer Recruitment Policy, Health and Safety Policy, Behaviour Policy and disciplinary procedures.

### 2. Legal and regulatory framework

This policy is informed by and intended to operate consistently with the Public Interest Disclosure Act 1998, which protects certain workers from suffering detriment or dismissal for making protected disclosures; the Employment Rights Act 1996 as amended; Keeping Children Safe in Education 2025; Working Together to Safeguard Children 2026; and the Education (Independent School Standards) Regulations 2014, especially the requirements relating to welfare, health and safety, suitability of staff and leadership and management. The current government guidance for workers explains that whistleblowing applies where the worker reasonably believes the wrongdoing is in the public interest and falls within a recognised category such as criminal offence, breach of legal obligation, danger to health and safety, miscarriage of justice, environmental damage, or concealment of any of these matters. KCSIE 2025 also requires proprietors to ensure there are appropriate procedures for staff to raise concerns about poor or unsafe safeguarding practice or potential failures in the school's

safeguarding regime, and that such concerns are addressed sensitively and effectively in a timely manner. ([Legislation.gov.uk](http://Legislation.gov.uk))

The proprietor and senior leaders accept that whistleblowing is not an optional management preference. In a school, it is an essential component of lawful leadership, child protection culture, staff accountability and regulatory compliance. Where the concern relates to safeguarding, the school will always interpret this policy through the lens of child protection first.

### **3. Scope**

This policy applies to all workers at Daffodil Grammar School for Girls, including teaching staff, support staff, administrative staff, site staff, the headteacher, agency workers, supply staff, peripatetic staff, casual workers, trainees and, where appropriate, contractors working on behalf of the school. Although volunteers do not usually fall within the statutory whistleblowing employment protection regime in the same way as workers, the school will nevertheless accept and act upon concerns raised by volunteers in accordance with the spirit of this policy and the school's safeguarding obligations. Government guidance notes that statutory whistleblowing protections apply to most workers, but not to all categories such as volunteers. ([GOV.UK](http://GOV.UK))

This policy covers concerns about wrongdoing within the school, wrongdoing by individuals acting on behalf of the school, and wrongdoing connected to school activities, school premises, school governance, school finances, school records, school safeguarding systems, or school compliance obligations.

This policy does not replace:

- the grievance procedure, where the matter is solely about the worker's own employment position;
- disciplinary procedures;
- the complaints procedure for parents and carers;
- safeguarding reporting routes for immediate child protection action.

However, the existence of another procedure does not prevent a matter from also being a whistleblowing concern if it raises issues of public interest, child safety, lawfulness or institutional integrity.

### **4. Policy principles**

Daffodil Grammar School for Girls adopts the following principles.

A worker who raises a genuine concern honestly and reasonably will be treated seriously, respectfully and fairly, even if the concern later proves to be mistaken.

The school will not tolerate victimisation, retaliation, intimidation, hostility, unfavourable treatment, threats, isolation, loss of opportunity, reputational damage, reduction in duties, or any other detriment because a worker has raised or intends to raise a genuine concern.

Concerns will be considered on their substance, not on the seniority, popularity or status of the individual complained about.

Safeguarding concerns will be prioritised and escalated without delay. KCSIE 2025 expressly requires procedures for staff to raise concerns about poor or unsafe safeguarding practice and potential failures in safeguarding arrangements. ([GOV.UK](https://www.gov.uk))

The school will maintain confidentiality as far as reasonably practicable, but cannot promise complete anonymity where disclosure is necessary for a fair investigation, child protection, regulatory reporting, police action, employment process or legal obligation.

Malicious allegations made knowingly and deliberately false may be dealt with under disciplinary procedures, but a concern raised in good faith will not attract disciplinary action merely because it is unsubstantiated.

## **5. What kinds of concerns may be raised under this policy**

A whistleblowing concern may relate to any matter that the worker reasonably believes shows one or more of the following.

A criminal offence has been committed, is being committed, or is likely to be committed.

A person has failed, is failing, or is likely to fail to comply with a legal obligation.

There has been, is, or is likely to be a miscarriage of justice.

The health or safety of any individual has been, is being, or is likely to be endangered.

The environment has been, is being, or is likely to be damaged.

Information tending to show any of the above has been, is being, or is likely to be deliberately concealed.

These categories reflect the current statutory whistleblowing framework and current government guidance for employees. ([Legislation.gov.uk](https://www.legislation.gov.uk))

In a school context, this may include, but is not limited to, concerns about:

safeguarding failures or child protection malpractice;

poor or unsafe practice towards pupils;

a failure to report a safeguarding concern;

covering up abuse, neglect, harassment, exploitation or peer-on-peer abuse;

unsafe recruitment or undisclosed vetting failures;

falsification of records, including attendance, safeguarding, behaviour, finance or recruitment records;

improper interference with safeguarding files or allegations records;

serious breaches of health and safety;

financial mismanagement, fraud or misuse of school funds;

discrimination, victimisation or unlawful conduct;

serious breaches of the Independent School Standards;

failure by leaders or the proprietor to act lawfully or honestly;

improper pressure on staff to alter evidence, remain silent, or avoid reporting matters externally.

Because the school is awaiting DfE pre-approval and will be subject to Ofsted inspection as a non-association independent school, concerns relating to regulatory compliance, safeguarding systems, record accuracy, staff suitability and leadership integrity are especially serious.

## **6. Safeguarding and whistleblowing**

Where a concern relates in any way to the safety or welfare of a child, the concern must be treated first and foremost as a safeguarding matter. KCSIE 2025 requires schools to have procedures for staff to raise concerns about poor or unsafe safeguarding practice or potential failures in the school's safeguarding regime, and those concerns must be addressed sensitively, effectively and in a timely manner. ([GOV.UK](https://www.gov.uk))

Accordingly, if a worker believes that:

a child is at risk of harm;

a safeguarding concern has not been acted upon properly;

a member of staff has behaved in a way that may harm a child;

a leader is suppressing, downgrading or ignoring safeguarding information;

records are being altered, hidden or mishandled;

the DSL, headteacher or proprietor is failing to act appropriately;

there is unsafe safeguarding practice, including in relation to allegations, low-level concerns, online safety, attendance, supervision or recruitment;

the worker must not wait for a formal management route to become available. The concern must be raised immediately through the appropriate safeguarding route, including, where necessary, directly to children's social care, the police, the Local Authority Designated Officer, the local authority, the Department for Education, Ofsted or other prescribed body, depending on the nature of the concern.

Nothing in this policy prevents any worker from taking immediate action where a child appears to be at risk of immediate harm.

## **7. Distinction between whistleblowing, allegations, low-level concerns and grievances**

The school recognises that staff may be uncertain which process applies. A matter may also overlap more than one procedure.

Where the concern is about an adult's conduct towards a child and may meet the harm threshold, the school's allegations procedure applies and the matter must be referred promptly in line with safeguarding requirements.

Where the concern is about an adult's conduct towards children or professional boundaries, but appears below the harm threshold, the low-level concerns process applies.

Where the concern is about wrongdoing in the public interest, institutional failure, concealment, illegality, unsafe practice or regulatory non-compliance, the whistleblowing policy applies.

Where the concern is purely about the employee's own treatment, terms, interpersonal conflict or employment conditions, the grievance procedure usually applies.

If a member of staff is unsure which route applies, they should raise the concern under this policy and the school will ensure it is channelled appropriately. No concern will be rejected merely because the worker has used the wrong label.

## **8. Who a concern should be raised with**

Ordinarily, a worker should raise a concern with the headteacher. If the concern relates to the headteacher, it should be raised with the proprietor, ASM Anisuzzaman. If the concern relates to the proprietor, or if the worker reasonably believes the concern cannot be raised safely or effectively with the proprietor, the concern may be raised directly with an external body, including where relevant a safeguarding agency, regulator or prescribed person.

If the concern is a safeguarding concern involving risk to children, the worker should also report it to the DSL, unless the concern is about the DSL or the worker reasonably believes the DSL is implicated, unavailable, or failing to act. In that case the worker should go directly to the headteacher, the proprietor, children's social care, the police, the LADO, or another appropriate external body depending on the concern.

A worker may also raise a concern externally where:

the matter is exceptionally serious;

the worker believes there will be concealment or retaliation;

the worker has already raised the issue internally and nothing effective has been done;

the concern involves senior leadership or the proprietor;

the worker reasonably believes external disclosure is the safer or more appropriate course.

Government guidance for whistleblowers states that if a worker is not comfortable reporting internally, or if internal procedures are absent or ineffective, they may report to a prescribed body in confidence. ([GOV.UK](https://www.gov.uk))

## **9. How to raise a concern**

A concern may be raised verbally or in writing. The school prefers concerns to be confirmed in writing where possible, because this reduces misunderstanding and creates a clear record, but a verbal concern will be accepted and must still be acted upon.

A written disclosure should, where possible, state:

the nature of the concern;

the facts known to the worker;

the names of those involved, if known;

dates, times, locations and relevant events;

whether the concern has already been raised and, if so, with whom;

whether there is any immediate risk to children, staff, premises or records;

what evidence may exist, if any;

whether confidentiality is requested and why.

A worker is not expected to prove the truth of the allegation before raising it. The test is whether the worker has a reasonable belief that the disclosure tends to show wrongdoing of the type covered by law and that the disclosure is in the public interest. Current government guidance reflects this standard. ([GOV.UK](https://www.gov.uk))

## **10. Anonymous disclosures**

The school will consider anonymous concerns, especially where they relate to safeguarding, financial impropriety, serious health and safety risk, record falsification, or leadership misconduct. However, anonymity can make investigation harder and may limit the school's ability to seek clarification, test evidence or provide feedback.

Workers are therefore encouraged to identify themselves where possible so that the school can protect them and follow up properly. Where a worker wishes their identity to be protected, the school will respect that as far as it reasonably can.

## **11. Immediate protective action**

Where the concern suggests an immediate risk to a child or another person, or a risk of destruction of evidence, the school may take immediate protective action before a full investigation is completed. Such action may include restricting access to records, securing electronic systems, separating individuals, increasing supervision, contacting the police or

children's social care, suspending a process, or taking temporary staffing measures. Immediate protection of children and preservation of evidence take priority over procedural convenience.

## **12. Initial assessment of the concern**

On receipt of a concern, the person receiving it must ensure that it is logged promptly and treated seriously. An initial assessment will then be made to determine:

whether the matter is a whistleblowing disclosure;

whether it raises safeguarding issues;

whether it raises an allegation against staff, a low-level concern, a grievance, misconduct, fraud, health and safety breach or another issue;

whether immediate external referral is required;

who should investigate;

whether the worker requires any immediate support or protection from detriment.

If the concern concerns safeguarding, the school will not allow uncertainty about procedure to delay safeguarding action.

## **13. Investigation**

The school will investigate whistleblowing disclosures proportionately, fairly and without unnecessary delay. The nature of the investigation will depend on the seriousness of the concern and whether external agencies need to take the lead.

An investigation may involve review of records, interviews, safeguarding chronology, inspection of systems, financial review, compliance audit, consultation with legal or HR advisers, referral to the LADO, contact with external regulators, police liaison, or referral to children's social care.

Where the concern relates to child protection, criminal conduct, potential professional misconduct or serious regulatory breach, the school may be required to defer or limit its internal enquiries so as not to prejudice external investigations.

The individual who is the subject of the concern will not automatically be informed immediately if doing so could place a child at risk, destroy evidence, compromise witness accounts, prejudice a safeguarding or police process, or otherwise be unsafe or unfair.

## **14. Timescales**

The school will acknowledge receipt of a written whistleblowing concern as soon as reasonably practicable, normally within five school days.

The school will then make an initial decision on next steps as soon as possible. Because the nature of whistleblowing cases varies greatly, the school cannot guarantee a fixed completion period in every case. However, the school will aim to proceed without avoidable delay and, where

appropriate, will provide the whistleblower with suitable updates, subject to confidentiality, employment law and safeguarding restrictions.

Where a matter is exceptionally serious, involves external agencies, or requires specialist investigation, timescales may be extended. The worker will be told this, where it is lawful and appropriate to do so.

## **15. Outcome and feedback**

At the end of the process, the school will determine whether the concern is substantiated, partly substantiated, unsubstantiated, malicious, or inconclusive. The school will then decide what action is required, which may include safeguarding referral, disciplinary action, training, procedural change, audit, leadership direction, referral to a regulator, record correction, financial recovery, policy review or other remedial action.

The whistleblower will normally be told whether the matter has been considered and whether the concern has been upheld in whole or in part, but detailed feedback may be limited by confidentiality, legal privilege, safeguarding obligations, data protection, employment law or regulatory restrictions.

## **16. Protection from detriment**

The school prohibits any detrimental treatment of a worker because they have raised a protected or genuine whistleblowing concern. This includes dismissal, threats, disciplinary action, demotion, denial of promotion, isolation, cold-shouldering, removal of responsibilities, negative references, reputational undermining, or any other form of retaliation.

The Public Interest Disclosure Act 1998 provides legal protection for workers who make qualifying protected disclosures. Government guidance continues to state that workers are protected from unfair dismissal or detriment if they blow the whistle in the circumstances provided by law. ([Legislation.gov.uk](https://www.legislation.gov.uk))

Any worker who believes they are suffering detriment for having raised a concern must report this immediately to the headteacher, or to the proprietor where the concern relates to the headteacher, or externally where internal reporting is unsafe or ineffective. Retaliation against a whistleblower will itself be treated as a serious disciplinary matter.

## **17. Confidentiality**

The school will treat whistleblowing concerns with appropriate discretion and will seek to protect the identity of the whistleblower wherever reasonably practicable. However, absolute confidentiality cannot be guaranteed. There may be circumstances where the school is required to disclose the identity of the whistleblower or the substance of the concern, for example to children's social care, the police, the LADO, the Department for Education, Ofsted, legal advisers, insurers, a court or tribunal, or as part of fair process.

Where possible, the school will discuss this with the whistleblower before disclosure is made.

## **18. Malicious or knowingly false allegations**

The school distinguishes clearly between a genuine concern that turns out to be mistaken and a deliberately false allegation made maliciously or for personal advantage. A worker who raises a concern honestly and reasonably will not face disciplinary action merely because the concern is not upheld. However, if the school concludes that a person has knowingly made a false allegation or acted in bad faith, the matter may be dealt with under disciplinary procedures.

## **19. Record keeping**

All whistleblowing concerns, whether raised verbally or in writing, will be recorded securely. The record will include the date the concern was raised, the nature of the concern, the route of disclosure, the person handling the matter, any immediate action taken, whether external agencies were contacted, the outcome, and any follow-up or review required.

Where the concern overlaps with safeguarding, allegations management, low-level concerns, complaints, disciplinary proceedings or regulatory reporting, the school will ensure that records are cross-referenced appropriately while still maintaining necessary confidentiality and restricted access.

Records will be retained in accordance with the school's retention arrangements and any applicable safeguarding, employment, legal and regulatory requirements.

## **20. External disclosures and prescribed bodies**

While the school encourages internal reporting where this is safe and appropriate, workers may make disclosures to external prescribed bodies where permitted by law. Current government guidance states that workers who are not comfortable reporting internally may report in confidence to prescribed bodies. ([GOV.UK](https://www.gov.uk))

Depending on the nature of the concern, external bodies may include:

the local authority children's social care service;

the police;

the Local Authority Designated Officer;

the Department for Education;

Ofsted;

the Health and Safety Executive;

HM Revenue and Customs;

the Information Commissioner's Office;

the Charity Commission, if relevant in future;

the Disclosure and Barring Service, where a referral duty arises;

the Teaching Regulation Agency, where misconduct thresholds are engaged;

the NSPCC Whistleblowing Advice Line, which remains available to professionals worried about how child protection concerns are being handled in an organisation. ([GOV.UK](https://www.gov.uk))

Nothing in this policy is intended to prevent lawful reporting to a prescribed body or emergency service.

## **21. Responsibilities**

### **The proprietor**

The proprietor, ASM Anisuzzaman, has overall responsibility for ensuring that the school has an effective whistleblowing policy, that workers can raise concerns safely, that concerns are taken seriously, that retaliation is prohibited, and that matters involving the headteacher or systemic leadership failures are handled properly. The proprietor must also ensure that safeguarding-related concerns are not minimised or filtered through inappropriate management barriers.

### **The headteacher**

Mr Stephen Montford is responsible for implementing this policy day to day, fostering a culture of openness, receiving and acting on concerns unless he is the subject of the concern, protecting staff from detriment, commissioning investigations where appropriate, ensuring proper record keeping, and reporting serious matters to the proprietor and external bodies where required.

### **The DSL**

Eman Ahamed, as DSL, is responsible for ensuring that whistleblowing concerns touching on safeguarding are immediately connected to the school's child protection procedures, and that any concern about poor or unsafe safeguarding practice is escalated appropriately and without delay, in line with KCSIE 2025. ([GOV.UK](https://www.gov.uk))

### **All workers**

All workers are responsible for speaking up where they reasonably believe wrongdoing may be occurring, especially where children may be at risk. Silence in the face of serious wrongdoing is incompatible with professional duty in a school.

## **22. Training and awareness**

The school will ensure that all staff are made aware of this policy through induction and regular training. Staff will be told what whistleblowing is, why it matters, how it differs from grievance, how to raise a concern, how safeguarding concerns must be escalated, and how the school will protect those who speak up. KCSIE 2025 continues to require a safeguarding culture in which staff can raise concerns about poor or unsafe practice. ([GOV.UK](https://www.gov.uk))

Senior leaders will also ensure that this policy is aligned with staff conduct expectations, allegations procedures, low-level concerns arrangements and safer recruitment systems.

## **23. Monitoring and review**

This policy will be reviewed at least annually and sooner if there is a change in law, statutory guidance, regulatory expectation, school structure or learning from a case. The proprietor will monitor the effectiveness of the policy, including whether concerns are raised promptly, whether responses are timely and effective, whether safeguarding concerns are properly escalated, and whether there is any evidence of a culture of fear or silence.

## **24. Adoption**

This policy is adopted as the Whistleblowing Policy of Daffodil Grammar School for Girls and takes effect immediately upon approval by the proprietor.