



**Federation of
Westminster Special Schools
& Bi-Borough Inclusion Service**

Whistleblowing Policy

Policy adopted by Full Governing Board: July 2025

To be reviewed: July 2026

(Unless Westminster policy updated before this date)

WHISTLEBLOWING POLICY

INTRODUCTION

This policy is based on the Westminster City Council (WCC) policy (updated September 2024), adapted, where appropriate, for the Federation of Westminster Special Schools (FWSS). It identifies appropriate procedures for Whistleblowing. It is reviewed annually by the Full Governing Board or more frequently if WCC update their policy.

WHAT IS WHISTLEBLOWING?

Whistleblowing is the term used when a member of staff passes on information concerning wrongdoing. The wrongdoing will typically (although not necessarily) be something they have witnessed at work.

To be covered by whistleblowing law, the staff member who makes the disclosure must reasonably believe two things:

1. The first is that they are acting in the public interest. This means that personal grievances and complaints are not usually covered by whistleblowing law.
2. The second thing that the staff member must reasonably believe is that the disclosure tends to show past, present or likely future wrongdoing falling into one or more of the following categories:
 1. criminal offences (for example, types of financial impropriety such as fraud or sexual assault)
 2. failure to comply with an obligation set out in law (for example, any form or discrimination, bullying and harassment or victimisation)
 3. miscarriages of justice (i.e corruption, bribery etc)
 4. endangering of someone's health and safety (In FWSS this includes concerns around child protection and the safeguarding of individuals where safeguarding/child protection thresholds are met)
 5. damage to the environment
 6. covering up wrongdoing in the above categories

To assist the staff member in identifying that they have a valid whistleblowing claim they may wish to seek advice first, suggested points of contact are detailed at the end of this policy.

Whistleblowing law is located in the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998).

This policy relates to the actions that will be taken by the Federation. If the whistleblowing relates to a Westminster Council Officer then the process will be followed by them rather than via the Federation process.

This policy should be read in conjunction with

- Westminster City Council's anti-fraud and corruption policy
- FWSS Code of Conduct
- FWSS Child Protection and Safeguarding Policy
- FWSS Equalities Policy

SCOPE

Staff are encouraged and, indeed, expected to raise any concern that they may have, without fear of recrimination. Any concerns raised will be treated in the strictest confidence and will be properly investigated.

The aim of this Policy is to encourage those who work within FWSS and have serious concerns about any aspect of the Federation's work, to come forward and report their concerns at the earliest opportunity; so that they can be properly investigated.

WHO CAN RAISE A CONCERN UNDER THIS POLICY?

This policy applies to the following:

- Employees of WCC at the FWSS
- Employees of contractors working for WCC at FWSS for example, agency staff, builders and drivers
- Those providing services under a contract or other agreement with WCC at FWSS
- Voluntary workers at FWSS

WHAT CONCERNS CAN BE REPORTED UNDER THIS POLICY?

Any serious concerns that a staff member has:

- about service provision or the conduct of staff at FWSS or others acting on behalf of the FWSS; and
- which falls within the six qualifying categories listed under the introduction to this policy.

Please be advised that to raise a concern under the Whistleblowing policy the staff member must be driven by the underlying concern that if they don't "whistleblow" then this may affect other people too (or, in other words, that they are acting in the public interest). If this is not the case, then the case cannot be handled under this policy and will need to be processed in accordance via the appropriate policy.

Some of the other areas that their concern may fall into are:

- Federation Disciplinary policy
- Federation Grievance policy
- Federation Discrimination, Bullying and Harassment policy
- Federation Mediation Policy
- Federation Code of Conduct

HOW TO RAISE A CONCERN

The staff member may raise their concerns by calling the WCC external whistleblowing hotline, Safecall on 0800 915 1571 or using the link below.

. <https://app.safecall.co.uk/en/file-a-report>

Safecall provide a 24 hour a day, 7 days a week service via a freephone number. When contacting Safecall the staff member will be put in touch with an operator who is trained to receive a report about concerns in the workplace.

If you are a manager and a member of staff reports a concern to you, you should take one of two actions;

- Offer to log the concern with Safecall on the staff member's behalf; or
- Advise the member of staff to raise their concerns with Safecall as per the instructions above

When raising concerns, the staff member should do so as early as possible and try to provide as much detail as possible, especially:

- The nature of the concern and why they believe it to be true
- The background and history of the concern (giving relevant dates)

Although they are not expected to prove beyond doubt the truth of their suspicion, they will need to demonstrate that they have a genuine concern relating to suspected wrongdoing or malpractice within the Federation and there are reasonable grounds for their concern.

Once the concern is raised, the process is as follows:

CONFIDENTIALITY

All concerns will be treated in confidence and every effort will be made not to reveal the identity of the member of staff. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of the disclosure without their help, so they may be asked to come forward as a witness.

ANONYMITY

This policy encourages the staff member to put their name to their allegation whenever possible. It is possible for them to maintain full anonymity, but if they do not say who they are it will be much more difficult for their position to be protected or for feedback to be given.

Concerns expressed anonymously are much less powerful, but they will be equally taken into consideration by the Federation who will consider factors such as:

- The seriousness of the issue raised
- The credibility of the concern, and
- The likelihood of confirming the allegation from other sources

UNTRUE ALLEGATIONS

If an allegation is made in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, FWSS will recognise the concerns of the staff member and they will have nothing to fear.

However, if the allegation is made frivolously, maliciously or for personal gain, appropriate action will be taken that could include disciplinary action.

WHAT WILL THE FEDERATION DO?

The Federation will respond to your concerns as quickly as possible. It should not be forgotten that testing the staff member's concerns is not the same as either accepting or rejecting them.

The overriding principle for the Federation will be the public interest. In order to be fair to all staff, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality i.e by not informing the subject of the complaint until (or if) it becomes necessary to do so.

Where appropriate, the matters raised may:

- be investigated by Federation management, internal audit and fraud, or through the disciplinary/grievance process
- be referred to the police
- be referred and put through established child protection/abuse procedures

It is likely that the staff member making the allegation will be interviewed to ensure that their disclosure is fully understood. This meeting can take place away from Federation premises.

WHAT THE STAFF MEMBER CAN EXPECT

Throughout the process of addressing the concern the staff member can expect:

- The concern to be taken seriously
- to be given full support from senior management
- that the FWSS will do all it can to help the staff member through the investigation to be notified of the case outcome if they wish.

The staff member will receive feedback as much as is possible when the outcome is notified following the investigation of the reported concern, but in certain cases it might not be possible to provide specific details around the actions which have been taken.

Independent ADVICE

Advice can be obtained from a trade union representative or “Public Concern at Work” an independent charity which gives advice on how to raise concerns about serious malpractice at work. Contact details below.

Unison 0845 355 0845
GMB 020 7736 5683

NEU 0345 811 8111

NAHT 0300 3030 300

ASCL 0116 2991122

Public Concern at Work (<http://www.pcaw.co.uk/> 020 3117 2520) an independent charity which gives advice on how to raise concerns about serious malpractice at work.

Employee Assistance Programme 0800 0856 148