The APC has adopted this Confidential Reporting Policy recommended by WSCC.

1. Introduction

1.1 Employees are often the first to realise that there may be something seriously wrong within their school. However, they may not say anything because they feel that speaking up would be disloyal to their colleagues or to the school's managers. They may also fear harassment or victimisation. It may be easier for them to ignore the concern rather than report what may just be a suspicion of malpractice.

1.2 The school is committed to the highest possible standards of openness, probity, and accountability. So, we expect employees, and others we deal with, who have serious concerns about the school's work to come forward and voice them.

1.3 It is recognised that many cases will have to proceed on a confidential basis.

This policy document makes it clear that you can raise concerns without fear of victimisation, subsequent discrimination, or disadvantage. This Confidential Reporting (Whistleblowing) Policy is intended to encourage and enable employees to raise serious concerns within a school rather than overlooking a problem or 'blowing the whistle' outside. These rules are important but underlying the rules is the commitment of the school's governing body that the school should have and encourage a culture of improvement and openness and not control and blame.

1.4 The policy applies to all employees (regardless of contract type), volunteers, interns, secondees and those contractors working on school premises, for example, agency staff, builders, and drivers. It also covers suppliers and those providing services under a contract with the school in their own premises.

1.5 These procedures do not stand-alone and are in addition to, for example, the school's grievance procedures and other personnel procedures as well as the complaints and other relevant reporting procedures agreed by governors. Where other procedures are activated simultaneously, a clear agreement will be reached between the responsible officer who is investigating the concern and the individual making the report about the separate procedures, with agreed programmes for each and an agreement as to whether information can be shared for the purposes of each procedure.

1.6 This policy has been discussed with the relevant trade unions and professional organisations and has their support.

2. Aims And Scope Of This Policy

2.1 There are existing procedures in place for you to lodge a grievance relating to your own employment. The Confidential Reporting (Whistleblowing) Policy is intended to cover major concerns that may fall outside those procedures. These include:

- Conduct which is a criminal offence or a breach of law.
- Disclosures related to miscarriages of justice.
- Health and safety risks, including risks to the public as well as other employees.
- Damage to the environment.
- The unauthorised use of public funds.
- Possible fraud and corruption.
- Sexual, physical, or verbal abuse.
- Sexual harassment
- Other unethical conduct.

You are entitled to seek advice about which procedure is most appropriate for your concern, in which case you should contact one of the officers listed in para. 6.2.

2.2 Thus, any serious concerns that you have about any aspect of service provision, or the conduct of staff employed by the school or others acting on behalf of it can be reported under the Confidential Reporting (Whistleblowing) Policy. This may be about something that:

- Makes you feel uncomfortable in terms of known standards, your experience, or the standards you believe the school subscribes to OR
- Is against the School's Standing Orders and policies OR
- Amounts to improper conduct.

You do not have to refer to the Confidential Reporting (Whistleblowing) Policy to have an issue or complaint dealt with under the Policy.

2.3 This policy aims to:

- Encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice AND
- Provide avenues for you to raise those concerns and receive feedback on any action taken AND
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied AND
- Reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made any disclosure in the public interest.

2.4 If you are not covered by the categories of individuals set out in paraphaph 1.4, the County Council's corporate Complaints Procedure is available to you. This may be found on the County Council's website.

3. Safeguards: Harassment Or Victimisation

3.1 The governing body is committed to good practice and high standards and wants to be supportive of employees.

3.2 The governing body recognise that the decision to report a concern can be a difficult one to make. If you believe what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer and those for whom you are providing a service.

3.3 The governing body will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern with a reasonable belief and in the public interest.

3.4 Any investigation into allegations of potential malpractice will not influence, or be influenced by, disciplinary or redundancy procedures that already affect you.

4. Confidentiality

4.1 All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness, or agree to your identity being disclosed, or the details of your concerns shared with others.

4.2 This policy encourages you to put your name to your concerns whenever possible.

4.3 Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Local Authority.

4.4 In exercising this discretion, the factors to be considered would include:

- The seriousness of the issues raised AND
- The credibility of the concern AND
- The likelihood of confirming the allegation from attributable sources.

4.5 The responsible officer may ask you to explain your original concern in further detail if his/her investigation fails to substantiate it.

5. False Or Unproven Allegations

5.1 If you express a concern with a reasonable belief of a potential breach, but it is not confirmed by the investigation, no action will be taken against you.

5.2 If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

6. How To Raise A Concern

6.1 As a first step, you should normally raise concerns with your **immediate manager** or their **senior manager**. You may also feel able to approach a member of the governing body. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the misconduct. If you believe that senior managers are involved, you should contact the chair of governors. If this does not allay your concerns you can contact someone outside your school, as outlined in para 6.2 or section 7.

6.2 The County Council has several **Contact Officers** who will have been trained and will have a lead **role in advising on the procedure of the Confidential Reporting (Whistleblowing) Policy.** They can give you advice on how to deal with your concerns and they can take forward a concern for investigation. Any advice they give you will be strictly confidential. You do not have to use any particular Contact Officer. If for example you have a problem which you feel has a legal aspect (for example if you think the conduct complained of could be a breach of the law) you may feel it more appropriate to deal with the Legal Contact Officer. If it relates to financial problems the Internal Auditor might be more appropriate.

Service Area	Contact Officer
Lead Contact Officer	Lauren McCann, Monitoring Officer Executive Director of Law, Assurance and Insight
Adults' Services	Julie Philips (Contact no. 033 022 28140) or Chief Social Worker
Children's Services	Collette Visagie (Contact no. 033 022 27312)
Communities	Emily King (Contact no. 033 022 23876)
Education and Schools	Claire Hayes (Contact no. 07702 442462)
Environment	Wayne Lewis (Contact no. 033 022 27291)
Finance and Support Services	Mike Suarez (Contact Email: Mike.Suarez@westsussex.gov.uk)
Fire & Rescue	Gary Ball (Contact no. 07762 727373) or Matt Cook
Highways, Transport and Planning	Matt Davey (Contact no. 033 022 25622)
Human Resources, Organisational Development and Communications	Gavin Wright (Contact no. 033 022 22369)
Property and Assets	Andrew Edwards (Contact no. 033 022 24261)
Public Health	Kate Bailey (Contact no. 033 022 24775)
Safeguarding Local Authority Designated Officer (LADO)	Use the online portal to make a LADO referral

6.3 The Contact Officer will be responsible for ensuring that you are kept informed of the progress of your complaint, and for ensuring that you are aware as far as possible of the outcome and any action which results. If you are concerned about any aspect of your complaint once you have made it, you should speak to the Contact Officer.

6.4 There are also officers in the Council who have **responsibilities for the standards of conduct we seek to uphold**. If you feel unable to use either your own management or a Contact Officer, you may contact one of the **Responsible Officers** listed below:

- Monitoring Officer (Executive Director of Law, Assurance and Insight) – Lauren McCann
- Chief Financial Officer (Executive Director of Finance and Support Services) Mike Suarez
- Chief Internal Auditor – Neil Pitman

6.5 There are several officers in the County Council who have **responsibilities for propriety** in addition to the above and if you feel it is inappropriate to use either your own management or a Contact Officer, you may contact one of the Responsible Officers listed below:

Role	Responsible Officer Details
Monitoring Officer Director of Law, Assurance and Insight	Lauren McCann
Executive Director of Finance & Support Services	Mike Suarez
Chief Internal Auditor	Neil Pitman
Chief Executive	Leigh Whitehouse

6.6 The **Monitoring Officer** has special responsibility at officer level for propriety and standards within the authority. Therefore, if you feel that your complaint cannot be dealt with other than through the key officer responsibility for propriety, you should contact the Monitoring Officer direct.

6.7 If you have a complaint about the Monitoring Officer or the staff of the Monitoring Officer's which you would otherwise have taken to the Monitoring Officer, you should go to the Chief Executive.

6.8 6.8 Concerns may be raised orally initially but should be recorded in writing. Staff who wish to make a written report are invited to use the following format:

- The background and history of the concern (giving relevant dates) AND

- The reason why they are particularly concerned about the situation.

Your contact officer will provide any help you need in expressing your concern.

6.9 The earlier you express the concern the easier it is to take action.

6.10 Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for concern.

6.11 Once contact has been made an initial assessment of the complaint will lead to a decision about whether further investigation is needed, whether a different procedure should be used or whether the complaint does not justify further action. You will be kept informed of the outcome.

7.0 Contacts For Independent External Advice

Protect: https://protect-advice.org.uk/
Protect is the UK's whistleblowing charity. It aims to stop harm by encouraging safe whistleblowing. Its free, confidential advice line supports more than 3,000 whistleblowers each year who have seen malpractice, risk, or wrongdoing in the workplace.
Telephone: 020 3117 2520
Opening Hours: Protect's advice line is open on Mondays, Tuesdays, Thursdays: 9:30am – 1pm, 2pm – 5:30pm; Wednesdays and Fridays: 9:30am – 1pm. Further information on contacting Protect's advice line is available here: https://protect-advice.org.uk/contact-protect-advice-line/

National Audit Office: https://www.nao.org.uk/
Telephone: 020 7798 7999
More details about whistleblowing and other contact information for the NAO can be found here: https://www.nao.org.uk/about-us/contact-us/whistleblowing/

7.1 If your concern is about a financial issue, you can use the Anti-Fraud Hotline (telephone: 03302 228666, Email: fraudhotline@westsussex.gov.uk). There is more information available on the Council's stance on fraud and corruption online.

7.2 You may wish to consider discussing your concern with a colleague first and you might find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

7.3 You may invite your trade union, professional association representative or a friend to be present during any meetings or interviews in connection with the concerns you have raised. Anyone who helps you will need to respect the confidentiality of the investigation.

8. How The Local Authority Will Respond

8.1 The Local Authority will respond to your concerns. Do not forget that a contact Officer or an investigator testing out your concerns is not the same as either accepting or rejecting them.

8.2 The person you contact, whether it is your manager, a Contact Officer, a Responsible Officer, or the Monitoring Officer, will either deal with your issue or nominate someone to do so who will not have been involved in the issue themselves and will know how to carry forward this policy. This may involve an interview to take a detailed account of your concerns and any evidence available.

8.3 Where appropriate, the matters raised may:

- Be investigated by management, internal audit, or through the disciplinary process.
- Be referred to the police.
- Be referred to the external auditor.
- Form the subject of an independent inquiry, for example, through the Local Safeguarding Board for child abuse.

8.4 In order to protect individuals who may be the subject of your concern and people against whom allegations of misdeeds or possible malpractice are being made, the responsible officer will make initial enquiries to decide whether a fuller investigation is appropriate. They will also decide what form the investigation should take.

8.5 If the concern is about vulnerable individuals, or a criminal activity, action will be taken promptly to protect the individual and prevent further offences. The overriding principle which the Local Authority will have in mind is the public interest. If the person nominated to deal with your issue finds aspects of the concerns fall outside the scope of this Policy, but which still need to be addressed, they will normally be referred for consideration but will not be allowed to delay the investigation under the Policy.

8.6 Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

8.7 Within ten working days of a concern being raised with the person dealing with your issue they:

(i) will write to you

- Acknowledging that the concern has been received.
- Indicating how we propose to deal with the matter.
- Giving an estimate of how long it will take to provide a final response.
- Telling you whether any initial enquiries have been made.
- Supplying you with information on staff support mechanisms.

- Telling you whether further investigations will take place and if not, why not.

(ii) will inform the Monitoring Officer that an issue has been raised under this policy.

8.8 The amount of contact between the officers considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, the Local Authority will seek further information from you.

8.9 Where any meeting is arranged, off-site if you so wish, you can be accompanied by a trade union or professional association representative or a friend.

8.10 The Local Authority will take steps to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings the Local Authority will arrange for you to receive advice about the procedure and where appropriate financial or other support.

8.11 The Local Authority accepts that you need to be assured that the matter has been properly investigated. Thus, subject to legal constraints, we will inform you of the outcome of any investigation.

9. The Monitoring Officer

9.1 The Monitoring Officer has overall responsibility for the maintenance and operation of this policy across the County Council, including its responsibility as a Local Authority. That officer maintains a record of concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report as necessary to the Council, including a quarterly anonymised report to the Standards Committee on the number and general nature of reports received by the Monitoring Officer. They will also be responsible for ensuring that proper and timely progress is made in dealing with any complaint, and that the principles and requirements of this policy are met.

10. How the Matter Can Be Taken Further

10.1 This policy is intended to provide you with an avenue within the school to raise concerns. The Local Authority hopes you will be satisfied with any action taken. If you are not, and if you feel it is right to take the matter outside the Local Authority, the following are possible contact points:

- The external auditor.
- Your trade union.
- Your local Citizens' Advice Bureau.
- Relevant professional bodies or regulatory organisations.
- A relevant voluntary organisation.
- The police.

- The local County Councillor (where appropriate).
- Other appropriate authorities.

10.2 If you do take the matter outside the Local Authority, you should ensure that you do not disclose confidential information. Check with a Contact Officer (see para 6.2) about that.

11. Document History

Date	Action	Author
2019	Reviewed - reviewed Director Education & Skills and Audit	SHRS
March 2020	Update CE contact	NH SHRS
May 2020	Sense checked	KMG SHRS
June 4 2020	Contact names in 6.2 and 6.4 reviewed / updated	NH SHRS and sense checked by KMG SHRS
July 2021	LADO contact names updated in 6.2	KMG SHRS
August 23 2023	Added the word 'whistleblowing' to the policy title throughout the document to align it to the titled of the corporate policy. Contact names in 6.2, 6.4 and 6.5 reviewed / updated. Contact details in section 7 reviewed / updated. In 8.4. changed 'he/she' to 'they'. Document History added and tidied up. Plus, various cosmetic changes (removed footer, section headings, bullet points tidied-up, text set to left alignment, page numbers).	KMG SHRS
February 7 2024	Updated section 6 of the document to remove duplicate point 6.7. Made second 6.7 into 6.8 and re-numbered the other three points that follow (they are now 6.9, 6.10 and 6.11). Text remains unchanged.	KMG SHRS
November 19 2025	Updated contact details in 6.2, 6.4, and 6.5.	KMG HR Policy Team
November 26 2025	Document finalised after review of changes made on 19/11/2025 by Legal.	KMG HR Policy Team

6 April 2026	Updated to add sexual harassment to the list of protected disclosures in line with the Employment Rights Act 2025	HR Policy Team/Democratic Services

END OF DOCUMENT

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