



## STAFF CODE OF CONDUCT

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| Written by: RS, HS              | September 2025 |
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## Whistleblowing Policy

### 1. Policy Statement

Sancton Wood School is committed to the highest standards of integrity, transparency, and accountability. We recognise that all employees have an important role to play in achieving these standards and in safeguarding the welfare of pupils and the reputation of the school.

This policy encourages and supports staff to raise genuine concerns about wrongdoing, malpractice, or failures in safeguarding within the school, whilst providing protection from victimisation or detrimental treatment.

**Safeguarding Context:** Whistleblowing is an essential component of our safeguarding arrangements. Staff have a professional duty to report concerns about the safety and welfare of children, including concerns about colleagues' conduct that may pose a risk to children.

### 2. Legal Framework and Principles

#### 2.1 Statutory Requirements

This policy operates within the framework of:

- **Public Interest Disclosure Act 1998** (Whistleblowing legislation)
- **Keeping Children Safe in Education 2025** (KCSIE)
- **Working Together to Safeguard Children 2018**
- **Independent School Standards** (ISI Standard 7 - Safeguarding)



- **Employment Rights Act 1996**

## 2.2 Fundamental Principles

- **Child protection is paramount** - safeguarding concerns must always be reported
- **Good faith reporting** is encouraged and protected
- **No tolerance for retaliation** against legitimate whistleblowers
- **Confidentiality** will be maintained where possible
- **Fair and thorough investigation** of all concerns raised
- **Learning and improvement** from issues identified

## 3. Scope and Definitions

### 3.1 What Constitutes Whistleblowing

Whistleblowing involves the disclosure of information that relates to suspected wrongdoing or dangers that affect others, particularly children. This includes:

#### **Safeguarding and Child Protection:**

- Suspected child abuse or neglect by staff or others
- Failure to follow safeguarding procedures
- Inappropriate relationships between staff and pupils
- Concealment of safeguarding incidents
- Inadequate safeguarding training or awareness

#### **Health and Safety:**

- Dangerous practices that could harm pupils or staff
- Failure to follow health and safety procedures
- Inadequate risk assessments or safety measures

#### **Criminal Activity:**

- Theft, fraud, or financial irregularities
- Physical violence or threats
- Criminal damage to property
- Illegal drug or alcohol use on premises

#### **Professional Misconduct:**

- Breach of professional codes of conduct
- Falsification of records or qualifications



- Inappropriate use of school resources
- Discrimination or harassment

### Regulatory Breaches:

- Failure to comply with Independent School Standards
- Breach of statutory requirements
- Failure to meet inspection requirements

### 3.2 What is NOT Whistleblowing

This policy does not cover:

- **Personal grievances** about employment terms or treatment (use Grievance Policy)
- **Personal disputes** between colleagues
- **Minor procedural issues** that can be resolved through normal management
- **Unsubstantiated concerns** based on rumour or speculation

### 3.3 Low-Level Concerns

In line with KCSIE guidance, staff should also report "low-level concerns" about colleagues that:

- Do not meet the threshold for referral to statutory agencies
- May indicate poor or concerning practice
- Could escalate to more serious issues if not addressed

## 4. Protection and Support for Whistleblowers

### 4.1 Legal Protection

Staff who raise concerns in good faith will be protected under the Public Interest Disclosure Act 1998 from:

- Dismissal
- Disciplinary action
- Detrimental treatment
- Harassment or victimisation
- Threat of any of the above

### 4.2 Confidentiality

- **Identity protection** - your identity will be kept confidential where possible
- **Anonymous reporting** - available through external channels where appropriate



- **Information sharing** - limited to those who need to know for investigation purposes
- **Media protection** - the school will not disclose your identity to media

## 4.3 Support Available

The school will provide:

- **Emotional support** and counselling if needed
- **Trade union representation** and involvement if requested
- **Regular updates** on investigation progress
- **Protection from retaliation** with monitoring for detrimental treatment
- **Access to external support** including professional advice lines

## 5. Reporting Procedures

### 5.1 Internal Reporting - Stage One

For most concerns:

1. **Report to your Line Manager** who will acknowledge receipt within 2 working days
2. **Provide written details** including dates, witnesses, and evidence where available
3. **Expect initial response** detailing action taken within 7 working days

For safeguarding concerns:

1. **Report immediately to the Designated Safeguarding Lead (DSL)**
2. **Follow child protection procedures** as outlined in the Safeguarding Policy
3. **Document concerns** using school safeguarding forms

If your Line Manager is involved in the concern:

- Proceed directly to Stage Two

### 5.2 Internal Reporting - Stage Two

Escalation to Senior Leadership:

1. **Contact the Head Teacher** if not already involved
2. **Provide full details** of the concern and previous actions taken
3. **Expect acknowledgement** within 2 working days
4. **Receive update** on action taken within 7 working days

For serious safeguarding concerns:



- **Immediate referral** to Local Authority Designated Officer (LADO): 01223 727 967
- **Contact emergency services** if child is in immediate danger: 999
- **Inform chair of governors** if Head Teacher is implicated

Where an allegation or safeguarding concern relates to a member of staff, leaders will notify the Local Authority Designated Officer LADO without delay and then inform OFSTED in accordance with statutory obligations. If any member of staff becomes aware that this notification has not occurred, they must report the concern immediately to the DSL. The DSL will ensure prompt notification to OFSTED and, where required, the ISI. Staff will not face any detriment for raising such concerns and are expected to uphold their responsibilities to report wrongdoing as part of maintaining a safe, transparent and accountable school culture.

### 5.3 Internal Reporting - Stage Three

#### Final internal escalation:

1. **Contact the Chair of Governors** or designated governor for whistleblowing
2. **Contact Jonathan Cuff (Managing Director)** if governors are implicated
3. **Expect formal investigation** to commence within 5 working days
4. **Receive written update** on progress within 14 working days

### 5.4 External Reporting

#### When to report externally:

- Internal procedures have been exhausted without satisfactory resolution
- Concerns about a cover-up or failure to investigate properly
- Belief that you would suffer detriment for internal reporting
- Immediate danger to children requiring urgent external intervention

#### External reporting channels:

##### For safeguarding concerns:

- **NSPCC Whistleblowing Advice Line:** 0800 028 0285 (8am-8pm, Mon-Fri)
- **Email:** [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- **Local Authority Designated Officer (LADO):** 01223 727 967
- **Cambridgeshire Children's Services:** 0345 045 0180
- **Police:** 101 (non-emergency) or 999 (emergency)

##### For other concerns:

- **Department for Education:** 0370 000 2288
- **Independent Schools Inspectorate (ISI):** 020 7600 0100



- **Health and Safety Executive:** 0300 003 1647
- **Information Commissioner's Office:** 0303 123 1113
- **Environment Agency:** 03708 506 506
- **Charity Commission:** 0845 300 0218

### Anonymous external reporting:

- **Safecall Confidential Reporting Service:** [contact details if subscribed]
- **Public Concern at Work:** 020 3117 2520

## 5.5 Emergency Procedures

### Immediate danger to children:

1. **Ensure child safety** - remove from danger if safe to do so
2. **Call emergency services** - 999 if immediate risk
3. **Contact DSL immediately** - or deputy if unavailable
4. **Document everything** - preserve evidence and records
5. **Follow up with formal report** - within 24 hours

## 6. Investigation Procedures

### 6.1 Initial Assessment

Within 5 working days of receiving a concern, the school will:

- **Assess the nature and severity** of the allegation
- **Determine appropriate investigation** process
- **Identify external agencies** that need to be informed
- **Appoint investigating officer(s)** who are independent of the concern
- **Notify relevant authorities** if statutory thresholds are met

### 6.2 Investigation Process

- **Terms of reference** established and communicated
- **Evidence gathering** including interviews and document review
- **Fairness ensured** for all parties involved
- **Regular updates** provided to whistleblower
- **External oversight** where appropriate (LADO, police, etc.)
- **Target completion** within 4-6 weeks for most cases



## 6.3 Outcomes and Actions

Possible outcomes include:

- **No case to answer** - concern unfounded after investigation
- **Management action** - improved procedures or training
- **Disciplinary action** - if misconduct is established
- **Criminal referral** - if illegal activity suspected
- **Regulatory reporting** - to relevant authorities as required
- **Policy changes** - to prevent recurrence

## 7. Record Keeping and Monitoring

### 7.1 Documentation Requirements

All whistleblowing cases will be recorded including:

- **Initial concern** and supporting evidence
- **Investigation process** and findings
- **Actions taken** and rationale
- **Outcomes** and lessons learned
- **Follow-up monitoring** arrangements

### 7.2 Confidentiality and Storage

- **Secure storage** of all documentation
- **Restricted access** to authorised personnel only
- **Data protection** compliance maintained
- **Retention periods** in line with statutory requirements
- **Anonymisation** where possible

### 7.3 Monitoring and Review

- **Annual review** of all whistleblowing cases
- **Pattern analysis** to identify systemic issues
- **Policy effectiveness** assessment
- **Staff feedback** on accessibility and confidence in process
- **Governor oversight** through regular reporting



## 8. Training and Awareness

### 8.1 Staff Training

All staff will receive training on:

- **Recognising concerns** that should be reported
- **Reporting procedures** and available channels
- **Protection available** to whistleblowers
- **Safeguarding responsibilities** and procedures
- **Professional duties** and ethical obligations

### 8.2 Leadership Training

Senior leaders and governors receive additional training on:

- **Receiving and handling** whistleblowing concerns
- **Investigation procedures** and fair process
- **Legal requirements** and protection duties
- **Multi-agency working** with external bodies
- **Supporting staff** who raise concerns

### 8.3 Regular Updates

- **Annual policy review** and communication
- **Case study learning** (anonymised)
- **Updates on legislation** and best practice
- **Refresher training** as required
- **New staff induction** including whistleblowing procedures

## 9. Raising Safeguarding Concerns

### 9.1 Immediate Safeguarding Response

For any concern about child welfare:

1. **Child's safety first** - ensure immediate protection
2. **Report to DSL** - within same working day
3. **Follow CPOMS procedures** - record all details
4. **External referral** if statutory thresholds met
5. **Inform parents** unless inappropriate to do so



## 9.2 Allegations Against Staff

When concerns involve school staff:

- **Immediate suspension** may be necessary pending investigation
- **LADO consultation** within 24 hours
- **Police involvement** if criminal activity suspected
- **Referral to DBS** if harm threshold met
- **Professional body reporting** where relevant

## 9.3 Support for Pupils

- **Immediate safety measures** put in place
- **Counselling support** arranged as needed
- **Family liaison** and communication
- **Multi-agency planning** for ongoing protection
- **Educational continuity** maintained where possible

## 10. Support Services and Resources

### 10.1 Internal Support

- **Designated Safeguarding Lead:** H. Settle [hannah.settle@sanctonwood.co.uk](mailto:hannah.settle@sanctonwood.co.uk)
- **Head Teacher:** R. Settle [richard.settle@sanctonwood.co.uk](mailto:richard.settle@sanctonwood.co.uk)
- **Chair of Governors:** J. Cuff [jonathan.cuff@dukeseducation.co.uk](mailto:jonathan.cuff@dukeseducation.co.uk)
- **Employee Assistance Programme:** [Details available on Behind the Unicorn sharepoint]

### 10.2 External Support and Advice

- **NSPCC Whistleblowing Advice Line:** 0800 028 0285
- **Public Concern at Work:** 020 3117 2520
- **ACAS (Advisory, Conciliation and Arbitration Service):** 0300 123 1100
- **Trade Unions:** Encourage staff to contact their representative
- **Citizens Advice:** 03444 111 444

### 10.3 Specialist Safeguarding Support

- **Local Authority Designated Officer (LADO):** 01223 727 967
- **Cambridgeshire Multi-Agency Safeguarding Hub:** 0345 045 0180
- **NSPCC Child Protection Helpline:** 0808 800 5000
- **Childline (for pupils):** 0800 1111



## 11. Malicious or Vexatious Allegations

### 11.1 Good Faith Requirement

This policy protects staff who raise concerns in good faith, meaning they:

- **Genuinely believe** the information is true
- **Act in the public interest** rather than for personal gain
- **Follow appropriate procedures** outlined in this policy

### 11.2 Consequences of Bad Faith

Staff who knowingly make false, malicious, or vexatious allegations may face:

- **Disciplinary action** up to and including dismissal
- **Legal consequences** if defamatory statements are made
- **Loss of protection** under whistleblowing legislation
- **Damage to professional reputation** and career prospects

### 11.3 Investigation of Motives

The school will consider whether allegations appear to be:

- **Genuinely held concerns** based on reasonable belief
- **Mistaken but honest** reports that prove unfounded
- **Deliberately false** accusations made with malicious intent
- **Personal grievances** disguised as public interest concerns

## 12. Review and Continuous Improvement

### 12.1 Annual Policy Review

The policy will be reviewed annually considering:

- **Effectiveness** of current procedures
- **Staff confidence** in the process
- **Legislative changes** and new guidance
- **Lessons learned** from cases handled
- **Best practice** from other organisations

### 12.2 Stakeholder Feedback

Regular consultation with:



- **All staff** through surveys and focus groups
- **Governors** and senior leadership
- **External advisers** and specialists
- **Pupils** (age-appropriate channels)

### 12.3 Continuous Development

- **Regular updates** to procedures based on experience
- **Enhanced training** programmes
- **Improved communication** and awareness
- **Technology solutions** for secure reporting
- **External benchmarking** against best practice

### 13. Related Policies and Procedures

This policy should be read in conjunction with:

- **Safeguarding and Child Protection Policy**
- **Staff Code of Conduct and Behaviour Policy**
- **Grievance Policy**
- **Disciplinary Policy**
- **Anti-Bullying and Harassment Policy**
- **Data Protection Policy**
- **Health and Safety Policy**
- **Complaints Policy**

### 14. Queries and Further Information

If you have any questions about this policy or need advice on whether to raise a concern, please contact:

#### Internal Contacts:

- **Designated Safeguarding Lead:** H. Settle [hannah.settle@sanctonwood.co.uk](mailto:hannah.settle@sanctonwood.co.uk)
- **Head Teacher:** R. Settle [richard.settle@sanctonwood.co.uk](mailto:richard.settle@sanctonwood.co.uk)
- **Chair of Governors:** J. Cuff [jonathan.cuff@dukeseducation.co.uk](mailto:jonathan.cuff@dukeseducation.co.uk)

#### External Advice:

- **NSPCC Whistleblowing Advice Line:** 0800 028 0285
- **Public Concern at Work:** 020 3117 2520



**Remember:** It is better to speak up and be wrong than to remain silent and allow harm to continue.

**"Speaking up about wrongdoing is not about being disloyal to the school - it is about being loyal to the children in our care."**