Whistleblowing Policy

Owner:	HR	Date Reviewed:	August 2026
Review Period	Bi-Annual	Next Review Date:	August 2028

Introduction

Radley Schools Group is committed to the highest standards of openness and accountability. The purpose of this policy is to provide employees with a formal, structured, and safe way to report concerns about unethical, illegal, or harmful activities within the Group. This policy allows for a safe environment for individuals to speak up, knowing they won't suffer repercussions and the Group encourages individuals to do so.

An important aspect of accountability and transparency is a mechanism to enable staff and other members of the school to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

The Public Interest Disclosure Act 1998 provides legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. Radley Schools Group has endorsed the provisions set out below so as to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns. Radley Schools Group encourages staff to report concerns they may have.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the school nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. It is reasonable to expect staff to use the whistleblowing procedures rather than air their complaints outside the school.

Scope of Policy

During their employment with the Group, all staff are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, in accordance with the Group's policies. This policy is designed to enable employees of Radley Schools Group to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to other policies being brought into use e.g. disciplinary procedure.

These concerns could include, for example:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes

- Dangers to Health & Safety, safeguarding, or the environment
- Criminal activity
- Sexual harassment, sexual misconduct, or inappropriate sexual behaviour
- Unethical conduct
- Gross incompetence
- Attempts to conceal any of these

Safeguards

1 Protection
This policy is designed to offer protection to employees of Radley Schools Group who disclose such concerns provided the disclosure is made:

- in good faith
- in the reasonable belief of the individual making the disclosure that shows malpractice or impropriety and they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case, malicious or wild allegations could give rise to legal action on the part of the persons complained about.

2 Confidentiality
Radley Schools Group will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential as long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

3 Anonymous allegations
This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Group.

In exercising this discretion, the factors to be taken into account will include:

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

4 Untrue allegations
If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

Procedures for Making a Disclosure
For procedures relating to safeguarding please see the Safeguarding Policy. On receipt of a complaint of malpractice, the member of staff who receives the complaint, must pass this information as soon as is reasonably possible, to the appropriate person as follows:

Complaints of malpractice will be investigated by the appropriate member of the Group Management Team or School SLT.

Employees who have a concern may write to the Head of the school or to the Group Head of HR. The employee should provide as much detail as possible and any supporting documentation they have. Employees can also raise concerns via the Staff Safe module which is available via CPOMS.

If the complainant is not satisfied that their concern is being properly dealt with they have the right to take their complaint directly to the CEO. They have the right to refer the complaint back to School SLT if they feel that line management, without any conflict of interest, can more appropriately investigate the complaint.

If the complaint is regarding the CEO or COO, the complainant has the right to take their complaint to the Warden of Radley College or the appropriate member of Council. If there is evidence of criminal activity then the person investigating the complaint should inform the police. Radley Schools Group will ensure that any internal investigation does not hinder a formal police investigation

Timescales

Due to the varied nature of these sorts of complaints, which may involve asking staff to investigate the complaint ("the investigating officer") and/or the police, it is not possible to lay down precise timescales for such investigations.

The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations. The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to their home address.

Investigating procedure

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures.
- The investigating officer should consider the involvement of the Group/school's auditors and the police at this stage and should consult with the Head/CEO.
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the CEO/Head or COO as appropriate.
- The CEO/Head or COO will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Group procedures.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcomes will be passed to the Group's auditors to enable a review of the procedures.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Warden of Radley College or with Radley Council. Details of how to do this can be obtained from the Radley College HR Director and Sub-Warden.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, the Group recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons (such as the Health and Safety Executive, the Audit Commission, or the utility regulators), or, where justified, elsewhere.