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FIDES et OPERA

**BROMLEY**  
HIGH SCHOOL

GDST  
GIRLS' DAY SCHOOL TRUST

# WHISTLEBLOWING POLICY

GDST  
GIRLS' DAY SCHOOL TRUST

# Whistleblowing Policy and Procedure

## Introduction

The purpose of this policy is to outline the GDST's approach to whistleblowing. Whistleblowing refers to the act of reporting or highlighting suspected wrongdoing in the workplace. At GDST, we are committed to conducting our work with honesty and integrity, and we expect everyone who works with us to uphold these values.

We recognise that, from time to time, things may go wrong or concerns may arise. It is important that you feel confident and supported in speaking up when something doesn't seem right. Creating a culture of openness and accountability helps us to identify and address issues early, and ensures that we continue to operate in a way that reflects our values.

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## 1. Five key points

1. You are encouraged to raise any concerns you may have about wrongdoing within GDST, whether at your school or at Trust Office.
2. This policy applies to all GDST staff and anyone who is considered a 'worker'.
3. If you raise a concern, you will be supported and protected throughout the process.
4. You can choose to raise your concern informally or formally, depending on what feels most appropriate.
5. Every concern raised will be taken seriously and investigated thoroughly and fairly.

## **2. How this policy can support you**

If you have witnessed or experienced something that feels wrong—whether it relates to behaviour, decisions, or practices—this policy is here to guide you. It explains how to raise a concern, what you can expect to happen next, and how we will support you throughout.

You do not need to have all the facts or evidence. If you have a genuine concern, we encourage you to speak up. We will take it from there and ensure it is looked into properly. To make the Policy and Procedures easier to understand, a flowchart is provided further below which you may find useful to look at.

## **3. Understanding whistleblowing**

Whistleblowing involves raising a concern about something serious that could affect individuals, GDST, or the wider community. This may include:

- Criminal activity
- Risks to health and safety
- Environmental harm
- Financial misconduct
- Breaches of legal obligations
- Attempts to conceal any of the above

You are not expected to investigate the matter yourself. If you have a reasonable belief that something is wrong, that is enough to raise a concern.

## **4. Who can use this policy**

A flowchart is provided below to provide guidance on actions to take. Please note that this reflects the general course of action to be taken, but does not cover every eventuality. The Head of Internal Audit can provide further advice as required.

This policy is available to all GDST staff, whether you work in a school or at Trust Office, and whether you are employed directly or classed as a 'worker'. Volunteers, contractors, and agency staff are also encouraged to raise concerns. If you are unsure whether this applies to you, please contact the Head of Internal Audit at [whistleblowing@wes.gdst.net](mailto:whistleblowing@wes.gdst.net) or speak to a member of your School Leadership Team.

## **5. When to use this policy**

You should use this policy when you have a concern about wrongdoing that may not be covered by other procedures. If your concern relates to your own employment or personal circumstances, other policies—such as the Grievance Procedure or Safeguarding Policy—may be more appropriate.

If you are unsure which route to take, the Head of Internal Audit can help you decide. The GDST's Employee Assistance Programme can also be contacted confidentially for advice if you are unsure of what to do: <https://gdst.oak.com/Home/Index/40e58dd6-0ea0-462a-98da-4ca9936a9b26>

## **6. Our commitment to you**

We will treat your concern with care, respect, and confidentiality. If you choose to remain anonymous, we will do our best to investigate, although there may be limitations.

We will keep you informed where possible, and explain any actions taken. You will not be treated unfairly for raising a concern, even if it turns out to be unfounded. What matters is

that you felt it was important to speak up.

If anyone tries to discourage you from raising a concern, or if you experience any negative treatment as a result, this will be taken very seriously.

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

### ***Stage 1 – Raising Your Concern***

If you have a concern, the first step is to speak with your line manager and the Head of Internal Audit at Trust Office. You can do this by emailing [whistleblowing@wes.gdst.net](mailto:whistleblowing@wes.gdst.net) . This helps ensure that Trust Office has a clear overview of all disclosures.

If you feel uncomfortable approaching your line manager, or if you believe they may be involved in the issue, you can skip this step and move directly to Stage 2. You are also welcome to bring someone with you—such as a colleague, friend, union representative, or advisor—if that helps you feel more supported.

Once your concern is raised, the Head of Internal Audit and your line manager will decide who is best placed to carry out an impartial investigation. You may be asked to provide a written statement, and we will keep you informed about what to expect next. The Investigating Officer will report their findings to the Head and a member of the Executive Leadership Team, who will take any necessary action. This could include internal disciplinary procedures or contacting external authorities.

### ***Stage 2 – If You Need to Escalate***

If you are not comfortable speaking to your line manager, or if you feel that the investigation was not handled properly, you can escalate your concern. You should contact the Head of your school or a member of the Executive Leadership Team at Trust Office, as well as the Head of Internal Audit.

They will arrange for another senior colleague to review the investigation and prepare a report, following the same principles as in Stage 1. Your identity will be treated with the utmost confidentiality and will not be shared without your consent.

### ***Stage 3 – Concerns About Senior Leadership***

If your concern involves the Head of your school or another senior manager, you should contact the Chief Executive Officer of the Trust or another member of the Executive Leadership Team, along with the Head of Internal Audit.

They will ensure that the matter is investigated by someone appropriate—either within GDST or externally—following the same fair and thorough approach.

### ***Stage 4 – If You Still Have Concerns***

If, after following the earlier stages, you still believe that your concern has not been properly addressed, you can raise the matter directly with the Chair of Council. Please also copy in the Head of Internal Audit when doing so.

This is also the route to follow if your concern relates specifically to the Executive Leadership Team at Trust Office.

## 8. Timelines and updates

We aim to respond promptly and keep you updated as the process unfolds. Some investigations may take longer, especially if they are complex, but we will ensure you are not left without information.

## 9. If you're not satisfied

If you feel your concern has not been handled properly, you can escalate it. Depending on the situation, this may involve speaking to the Head of your school, a member of the Executive Leadership Team, or the Chair of Council.

You also have the option to contact external organisations, including:

- Charity Commission – <https://forms.charitycommission.gov.uk/Raising-Concerns/>
- Secretary of State for Education – <https://www.education.gov.uk/contactus>
- Children's Commissioner – <https://www.childrenscommissioner.gov.uk/>
- NSPCC – [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- HMRC – <https://www.hmrc.gov.uk/>
- Financial Conduct Authority – <https://www.fca.org.uk/>
- Health and Safety Executive – <https://www.hse.gov.uk/>
- Environment Agency – <https://www.gov.uk/government/organisations/environment-agency>
- Protect – Whistleblowing Charity – <https://www.protect-advice.org.uk/>

## 10. Other policies that may be helpful

Depending on your concern, you may also wish to refer to the following GDST policies:

- Anti-bribery
- Modern slavery
- Anti-fraud and fraud response plan
- Conflicts of interest
- Gifts and hospitality
- Equal opportunities
- Dignity at work and grievance policies
- Health & safety policies

## 11. Legal background and information

If you're interested or need to know more about the legal framework, this section provides more information.

The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 to provide protection for workers who raise legitimate concerns about specified matters. These are called 'qualifying disclosures'. A qualifying disclosure is one made by an employee who has a reasonable belief that:

- a criminal offence
- a miscarriage of justice
- an act creating risk to health and safety
- an act causing damage to the environment
- a breach of any other legal obligation
- concealment of any of the above

is being, has been, or is likely to be, committed. This could include concerns regarding bribery, financial fraud or mismanagement, tax evasion, negligence, sexual harassment and unauthorised disclosure of confidential information.

It is not necessary for the worker to have proof that such an act is being, has been, or is likely to be, committed – a reasonable belief is sufficient. The worker has no responsibility for investigating the matter – it is the organisation's responsibility to ensure that an investigation takes place.

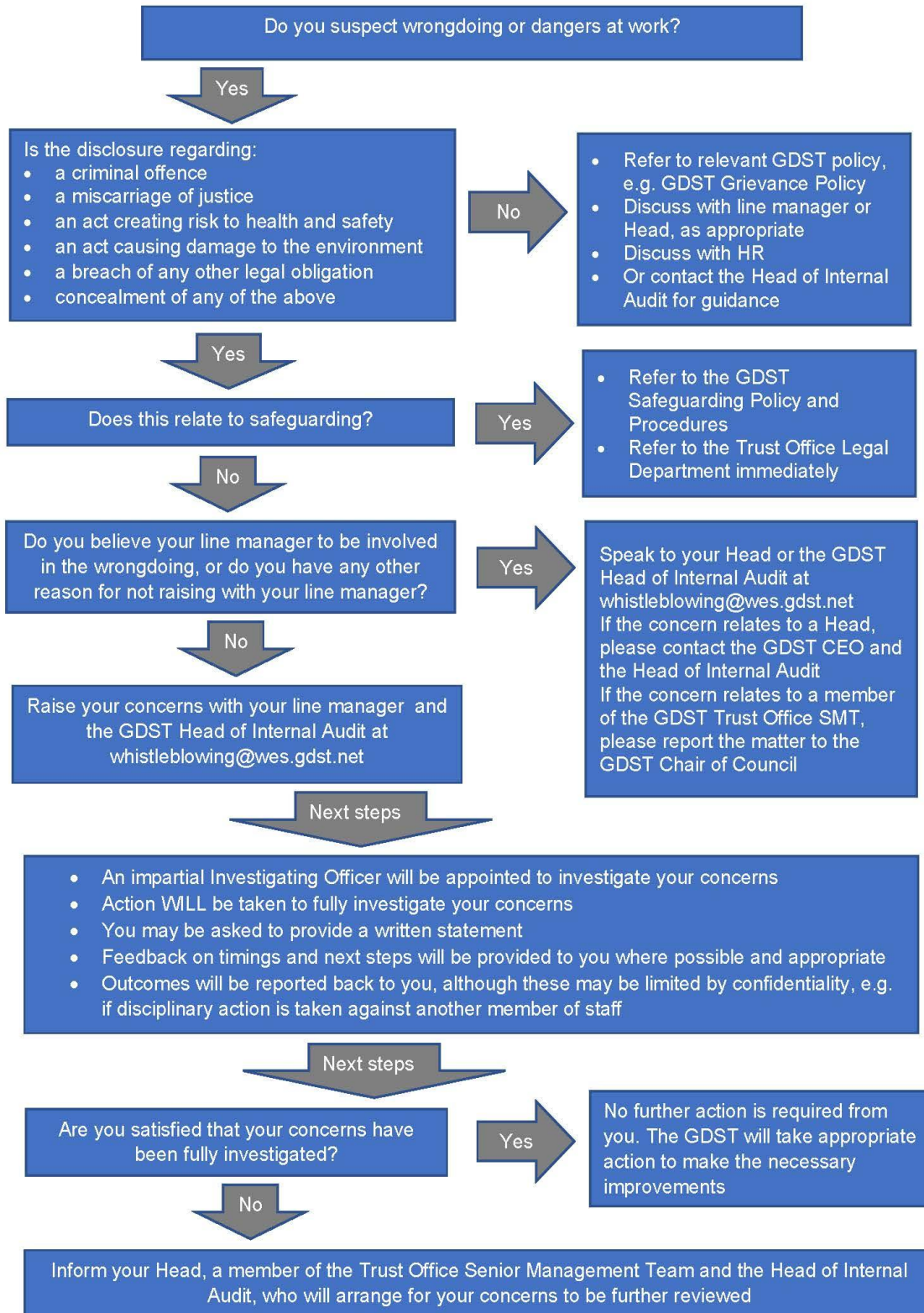
Staff who make such a protected disclosure have the right not to be dismissed, or subjected to victimisation, because they have made the disclosure. If concerns relate to matters that fall outside of the scope of whistleblowing protections, and staff do not believe that other GDST procedures for raising concerns would be appropriate in the circumstances (for example, the Grievance Procedure or procedures that deal with child safeguarding or bullying and harassment, including sexual harassment) staff are encouraged to follow the process detailed below. The GDST's Head of Internal Audit can provide advice on what this means in practice, consulting with relevant colleagues if necessary. In dealing with concerns outside the scope of Whistleblowing, the GDST reserves the right to adopt the procedure it considers to be the most appropriate in the circumstances.

The GDST encourages employees to raise their concerns informally and in confidence with their line manager, the Head or an appropriate member of staff at Trust Office in the first instance. We know that it is never easy to report a concern, particularly one that may relate to child protection or safeguarding, fraud or corruption. We urge staff to come forward with any concerns at an early stage, and before problems have a chance to become serious. The GDST's Employee Assistance Programme can also be contacted confidentially for advice if staff are unsure of what to do <https://gdst.oak.com/Home/Index/40e58dd6-0ea0-462a-98da-4ca9936a9b26>

If staff are not satisfied with the outcome of an informal discussion, or if for any other reason they feel it inappropriate to bring forward the issue on an informal basis, they should raise the matter in accordance with the procedures set out in this document.

## 12. Appendix: flowchart

### Flowchart of the Whistleblowing Process



## Document control and relevant information

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