



Bloomfield Collegiate School
excellence in a caring community

Whistleblowing Policy



Approved by the Board of Governors 26 February 2026

Applies to: All employees, agency staff, volunteers, student teachers/trainees, contractors, suppliers on site, and members of the school community (including parents/carers and visitors)

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Introduction

Purpose and Values

Bloomfield Collegiate School is committed to the highest standards of probity, openness, transparency, and accountability. We aim to create an environment where concerns about wrongdoing can be raised early, investigated fairly, and addressed promptly; without fear of detriment. This policy aligns with the Education Authority's approach to raising concerns and incorporates the key messages from the Northern Ireland Audit Office's (NIAO) good practice guidance.

The objectives of this policy are to:

- ensure that all employees feel supported in speaking up in confidence and reporting matters they suspect may involve anything improper, unethical and inappropriate;
- ensure that members of the public feel supported in speaking up in confidence and reporting matters they suspect may involve anything improper, unethical and inappropriate;
- provide clear procedures for the reporting of such matters;
- manage all concerns in a timely, consistent and professional manner; and
- provide assurance that all concerns will be taken seriously, treated as confidential and managed without fear of victimisation.

Scope

This policy covers concerns raised in the public interest (i.e., whistleblowing). It applies to:

- **Employees and workers** (including temporary, casual, agency, peripatetic and trainee/student teachers). Employees who make qualifying disclosures are protected under the **Public Interest Disclosure (Northern Ireland) Order 1998**.
- **Contractors and suppliers** working on the School premises.
- **Volunteers and visitors** to the School.
- **Members of the public** (e.g., parents/carers, former pupils) who wish to raise concerns in the public interest. Note: whistleblowing legislation does not extend the same employment protections to members of the public; however, the School will take all such concerns seriously and manage them under this policy.

Distinguishing whistleblowing from other routes

- **Whistleblowing:** danger, wrongdoing, or illegality that affects others/the public interest.
- **Grievance** (employment matter personal to the employee): use the School/EA Grievance Procedure.
- **Complaint about service** (from a member of the public): use the School's Complaints Procedure.
- **Child protection/safeguarding concerns:** use the School's Child Protection & Safeguarding Policy and contact the Designated Teacher (DT)/Deputy Designated Teacher (DDT) immediately.

What is Whistleblowing?

“Whistleblowing” (also “speaking up” or “raising a concern”) means telling someone in authority—inside the School, a regulator, or more widely—about **wrongdoing, risk, or malpractice**. The purpose is to protect pupils, staff, public funds, and the integrity of the School by identifying harm before it’s too late. Whistleblowing and raising a concern are the same thing.

Examples of wrongdoing (illustrative, not exhaustive)

- Criminal acts (e.g., theft, bribery); civil law breaches (e.g., slander/libel)
- Maladministration (unjustified delay, negligent advice)
- Breach or misuse of personal/sensitive information; data protection failures
- Health & safety risks to pupils, staff, or the public (e.g., faulty equipment)
- Abuse or neglect of children/vulnerable adults; safeguarding failures
- Misuse/unauthorised use of public funds; fraud; financial irregularities
- Bribery; conflicts of interest; environmental breaches; regulatory non-compliance
- Bullying/harassment; abuse of power; breach of staff or governor Codes of Conduct
- Deliberate concealment of any of the above.

Principles and Protections

- **Safety to speak up:** The School will foster a safe environment for staff and the school community to raise concerns in the public interest.
- **No victimisation:** Employees who raise genuine concerns under this policy will **not** suffer detriment, dismissal, or victimisation because they spoke up (except where complicit in wrongdoing). Protection applies even if concerns are not upheld, provided disclosures were made with a **reasonable belief** they were true, past/present/future.
- **Confidentiality:** Identities will be protected where requested, so far as possible. If disclosure is necessary (e.g., legal proceedings), we will discuss this first.
- **Anonymous concerns:** Accepted and assessed; however, investigation and feedback may be constrained.
- **Good faith and accuracy:** Disclosures should be factual, specific, and evidence-based where possible (not hearsay). Malicious allegations may lead to appropriate action.

Roles and Responsibilities

- **Board of Governors (BoG):** Owns this policy; ensures effective arrangements; receives assurance on cases and learning.
- **Principal:** Ensures culture of openness; ensures procedure is followed; appoints investigating officer (IO) where appropriate; safeguards confidentiality; liaises with external bodies (EA/DE/NIAO/PSNI) where required.
- **Designated Safeguarding Lead (DT) / DDT:** Receives and triages any safeguarding-related concerns immediately under safeguarding policy.
- **Investigating Officer (IO):** Conducts a fair, timely investigation; evaluates evidence; reports findings/outcome/recommendations to the Principal/BoG Chair as appropriate. Uses the Investigation Report template (Appendix B).
- **All Staff/Workers/Volunteers/Contractors:** Raise concerns early; cooperate with investigations; maintain confidentiality.

How to Raise a Concern (Internal Routes)

You may raise concerns **verbally or in writing**. Early reporting makes action easier. You are not required to prove your concern—only to have a **reasonable belief** in the disclosure. Discussing with a trusted colleague is acceptable if it helps clarify facts.

Step 1 – Line Manager / Head of Department

Where possible, raise the concern with your line manager/HoD. Provide relevant facts, dates, locations, and any evidence.

Step 2 – If you cannot raise it with your manager

Raise it with one of the following, as appropriate to the issue:

- **Principal:** Mr G Greer
- **Chair of the Board of Governors:** Mr N McBride (especially if the concern involves the Principal or SLT)
- **Designated Teacher (Safeguarding):** Mrs J Wharry (if safeguarding related)

Contact details can be obtained directly from reception.

Timeframes

- **Acknowledgement:** within **7 working days** of receipt.
- **Investigation aim:** most cases investigated and concluded within **30 working days** from acceptance as whistleblowing. If more time is needed, we will update you (where contact details are known).

Confidentiality & Records

We will store records securely, restrict access to a minimum, and be discreet about meetings.

Anonymous Disclosures

We will consider anonymous concerns; however, lack of contact may limit follow-up or feedback.

Investigation Process

The Principal (or BoG Chair if appropriate) will decide whether the concern constitutes whistleblowing and whether an investigation is required, taking advice as necessary. Where the concern is about alleged **fraud/financial misconduct** or involves senior leadership/governors, the School may consult EA Internal Audit or refer externally.

Stages

- **Stage 1 – Investigation:** An Investigating Officer (IO) is appointed; evidence is gathered; findings and recommendations are documented using the School’s Investigation Report (Appendix B) and associated notes.
- **Stage 2 – Review (process review):** If the whistleblower is dissatisfied with Stage 1, a **partner/independent reviewer** (not involved in Stage 1; e.g., a governor panel or external adviser) reviews whether the process was properly followed. If significant process failings are identified or new evidence emerges, a re-investigation may be commissioned.

Possible Outcomes (per component): **Founded, Unfounded, or Partially Founded**—with clear next steps and learning actions. Where allegations are founded/partially founded and involve staff conduct, appropriate HR or safeguarding procedures will follow; the whistleblowing case then closes and the relevant formal procedure takes over. Investigation reports are confidential and are **not** shared with the whistleblower.

Interaction with Other Policies

Concerns may be redirected to more appropriate procedures such as: **Child Protection & Safeguarding; Complaints; Grievance; Disciplinary; Health & Safety; Data Protection/Information Governance; Anti-Fraud; Code of Conduct.**

External Routes (Escalation)

While this policy provides internal mechanisms, it is also possible to raise concerns externally, for example where there is alleged fraud, a conflict of interest at School leadership level, or where you reasonably believe internal disclosure would result in victimisation or destruction of evidence. Depending on the issue and school management type, appropriate routes may include:

- **Education Authority (EA)** – Corporate Governance / Internal Audit (for public funds/fraud issues or where EA has responsibilities).
- **Department of Education (DE)** – **Head of Internal Audit** (address per EA policy)
- **Northern Ireland Audit Office (NIAO)** – www.niauditoffice.gov.uk
- **PSNI** – where criminal activity is suspected.
- **Northern Ireland Ombudsman**

Independent Advice

Staff may seek confidential advice from **Protect (formerly Public Concern at Work)** before raising a concern. Tel: 020 3117 2520; website: Protect Advice Line.

Communication, Training, and Culture

- The School will publicise this policy (staff handbook, induction, website/intranet) and provide periodic training/briefings.
- Senior leaders and governors will actively promote a culture of openness and visible leadership to encourage early raising of concerns.

Record-Keeping, Monitoring, and Learning

- The Principal (or delegated senior leader) will maintain a **Whistleblowing Register** and report anonymised trend data and learning to the BoG.
- Cases will be reviewed for timeliness, outcomes, and learning actions. Persistent or vexatious behaviours will be managed in line with the School's Unacceptable Actions/Behaviours approach (where adopted), consistent with the EA policy.

Data Protection and Confidentiality

All data will be processed in line with data protection law. Investigation records are confidential and retained in accordance with applicable retention schedules. Freedom of Information requests will be managed by the School's Information Governance lead; investigation reports that pertain to specific staff/employment generally attract standard exemptions.

Malicious or Vexatious Allegations

Where there is clear evidence that an allegation was deliberately false and malicious, appropriate action may be taken (e.g., disciplinary measures for employees, or referral to PSNI where criminal offences are suspected). This is distinct from concerns raised in good faith that are not substantiated.

Review of this Policy

This policy will be reviewed **every 3 years** or sooner if required by legislative, regulatory, or governance changes, or following significant incidents or learning from cases.

Reviewing Committee: Finance and General Purposes

Date Review Completed	Nature of Change	Date Ratified by Board of Governors
	New policy	23 April 2015
February 2026	Minor formatting changes	26 February 2026

Appendix A – Quick-Reference Flowchart (School)

1. **Raise Concern** → Line Manager/HoD → if not appropriate, to **Principal** or **BoG Chair** (or **DT/DDT** if safeguarding). Acknowledge within **7 working days**.
2. **Triage** → Decide: Whistleblowing vs. Grievance/Complaint/Safeguarding/Other → route accordingly.
3. **Stage 1 Investigation** → Appoint IO → Gather evidence → Report findings & recommendations (Founded/Unfounded/Partially Founded). Aim to conclude within **30 working days**; update if delayed.
4. **Outcome** → Where applicable, move to HR/Safeguarding/Other formal processes; log lessons learned.
5. **Stage 2 Review** (if requested) → Independent reviewer checks **process**. If serious failings/new evidence → re-investigation may be commissioned.
6. **Closure** → Confirm to whistleblower (subject to confidentiality/data protection); register updated; learning shared.

Appendix B – Investigation Report Template (School)

(Adapted from EA template)

- Case Ref / Date Opened / Case Owner
- Investigating Officer (name/role)
- Summary of concerns (bullet points)
- Stakeholders involved (e.g., HR, Safeguarding, Audit)
- **Timeline of investigative actions** (dates, actions, sources)
- **Findings** by allegation component (Founded / Unfounded / Partially Founded)
- **Recommendations** (including whether other policies should be invoked)
- **Lessons learned** and risk mitigations
- IO Signature / Date
(*Investigation reports are confidential and not shared with the whistleblower.*)

Notes:

Protection of Staff

The Board of Governors is committed to this policy. If an employee raises a concern in good faith the Board will protect them against harassment or victimisation and will, if necessary, apply the relevant procedures.

In accordance with the Public Interest Disclosure (Northern Ireland) Order 1998 an employee cannot be dismissed or selected for redundancy as a result of making a disclosure in good faith.

Employees who already are the subject of disciplinary, grievance or redundancy procedures will not have those procedures stopped or suspended as a result of their whistleblowing.

An employee must have a reasonable belief that a crime or risk as described above has occurred or may occur in the future.

In deciding whether or not an employee has acted reasonably, all circumstances will be taken into consideration but in particular:

- the identity of the person to whom the disclosure is made;
- the seriousness of the relevant ‘offence’;
- whether the ‘offence’ is continuing or is likely to occur in the future;
- whether the disclosure is made in breach of a duty of confidentiality owed by the employer to any other person;
- any action the employer or prescribed person might reasonably be expected to take as a result of a previous disclosure; and
- whether in making the disclosure to the employer the employee complied with procedures approved by the employer.

Protection applies where ‘external’ disclosures are made to such bodies as the police. In such instances the Board of Governors would expect to be satisfied that internal sources had been advised first or that the employees believed they would have been victimised or evidence would have been concealed or destroyed. External disclosures must be made in good faith, in the belief that allegations are substantially true and there should be no motive for personal gain.

The Procedure for Expressing Concerns

As a first step employees should raise concerns with their line manager. This may be done either orally or in writing.

If an employee feels unable to raise a concern with the line manager then the matter should be reported to the appropriate senior member of staff who will investigate the matter or have the matter investigated.

The employee will have the opportunity to decide whether or not he/she wishes to remain anonymous.

If an employee still has concerns then the matter should be reported to the Chair of the Board of Governors.

In the case of reporting to the Chair of the Board of Governors all correspondence should be marked ‘Private and Confidential’ and addressed to the Chair of the Board of Governors, Bloomfield Collegiate School. The correspondence should be handed to the Secretary to the Board of Governors, Mrs S. Johnston.

The Comptroller and Auditor General of the NIAO has been prescribed as a person to whom protected disclosures can be made under the Order. He is prescribed as having a role in relation to the proper conduct of public business, value for money, fraud and corruption in relation to the provision of centrally funded public services.

Prescribed persons are responsible for investigating allegations that fall under their prescribed role and for protecting the whistleblower and their interests whilst conducting an investigation.

Appendix C – Contacts & External Bodies

Internal (complete details):

- Principal: Mr G Greer
- Chair of Board of Governors: Mr N McBride
- Designated Teacher (Safeguarding): Mrs J Wharry
- Data Protection/IG Lead: Mr G Greer

External (confirm current details):

- Education Authority (Corporate Governance / Internal Audit)
- Department of Education – Head of Internal Audit: [Per EA policy]
- Northern Ireland Audit Office – Whistleblowing: [Per EA policy]
- PSNI (for criminal matters)
- **Independent advice:** Protect (Speak up, stop harm) – Tel 020 3117 2520; website.