ROYAL BALLET SCHOOL

SETTING THE STANDARD

WHISTLEBLOWING POLICY

SEPTEMBER 2026

1. Introduction

1.1 Staff are often the first to realise that there may be something seriously wrong within a school. However, they may be reluctant to express their concerns because they feel that speaking up would be disloyal to their colleagues or to the School. They may also fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

1.2 The School is committed to creating an atmosphere of openness and accountability. In line with that commitment, it expects staff, and others that it deals with who suspect wrongdoing to come forward and voice those concerns.

1.3 This policy aims to make it clear that a person can do so without fear of victimisation, subsequent discrimination or disadvantage. This whistleblowing policy is intended to encourage and enable employees to report suspected wrongdoing within the School rather than overlooking a problem or 'blowing the whistle' outside.

1.4 The policy applies to all staff and includes those contractors working for the School on its premises, for example, builders, agency and contractors' staff. It also covers suppliers, those providing services under a contract with the School at any of our premises, work placement students, casual workers, volunteers, governors, consultants and officers.

1.5 These procedures are in addition to the School's complaints procedures and other statutory reporting procedures.

1.6 This policy complies with the Public Interest Disclosure Act 1998 (PIDA) and will not seek to inhibit justifiable whistle blowing by restrictive 'gagging orders'.

2. Aims and Scope of this Policy

2.1 This policy aims to:

- encourage a person to feel confident in reporting suspected wrongdoing and to question and act upon concerns about practice;
- provide avenues for a person to raise those concerns and receive feedback on any action taken;
- ensure that the person receives a response to their concerns and that they are aware of how to pursue them if they are not satisfied;
- reassure the person that they will be protected from possible reprisals or victimisation if they have followed this procedure and raised a genuine concern.

2.2 There are existing procedures in place to enable staff to lodge a grievance relating to their own employment. The Whistleblowing Policy is intended to cover suspected wrongdoing or dangers at work that fall outside the scope of other procedures.

These include (but are not limited to):

- criminal activity
- Safeguarding & Child Protection concerns, (see paragraph 4 below)
- failure to comply with any legal or professional obligation or regulatory requirements
- disclosures related to miscarriages of justice
- health and safety risks, including risks to the public as well as other employees
- damage to the environment
- bribery
- the unauthorised use of School funds
- possible fraud, corruption or mismanagement
- any other unlawful or unethical conduct in the workplace
- the deliberate concealment of any of the above matters.

2.3 A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities you should report it under this policy.

2.4 This procedure should not be used where you have a complaint relating to your personal circumstances in the workplace. The grievance policy and procedure should be used in such cases. This policy does **not** replace the School's grievance policy & procedure.

2.5 If you are uncertain whether something is within the scope of this policy you should seek advice from the Director of People & Operations, Designated Safeguarding Lead, Public Concern at Work or the NSPCC Whistleblowing helpline.

3. Safeguards against Harassment or Victimisation

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

3.2 The School has a duty of care to all staff and all parties and will inform all parties when any investigations have been completed and the outcome (while taking into consideration confidentiality, data protection law etc.)

3.3 The School recognises that the decision to report a concern can be a difficult one to make. Provided that this procedure is used appropriately and correctly, you will not suffer any detriment as a result of reporting a suspected wrongdoing. In such cases, the School will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect a person.

A failure to follow this procedure may, however, make the disclosure unreasonable and the protection given to you by this procedure may be lost.

4. Safeguarding

4.1 Nothing within this policy is intended to prevent staff from complying with their statutory obligations in accordance with *Keeping Children Safe in Education* (DfE, September 2026). In particular:

- **Safeguarding / child protection policy:** You should raise, via CPOMS, any initial safeguarding concerns about a child with the Designated Safeguarding Lead in accordance with the School's Safeguarding Policy.
- **Safeguarding - member of staff:** You should raise any concerns about another staff member with the Designated Safeguarding Lead. The Academic & Pastoral Principal and Artistic Director must also be informed unless the concern is about them. If the concern is about the Designated Safeguarding Lead, the Academic & Pastoral Principal or Artistic Director, you should raise concerns with the Chief Executive Officer (without first notifying the Designated Safeguarding Lead, Academic & Pastoral Principal or Artistic Director). If the concern is about the Chief Executive Officer, you should raise your concerns with the Chair of Governors following the procedures set out in the School's Safeguarding Policy.
- **Whistleblowing policy:** You should follow this procedure to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or staff to properly safeguard the welfare of students if you are concerned that the School's Safeguarding Policy and procedures are not being followed correctly.
- **Referral:** If a child is in immediate danger or is at risk of harm a referral should be made to Children's Social Care and/or the Police immediately. Anyone can make a referral.

4.2 All staff are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of students, the conduct of staff or other matters, during the course of their employment in accordance with this policy. Safeguarding children is at the centre of the School's culture and concerns should always be raised in accordance with paragraph 4.1 above. If issues have not been identified before, safeguarding will always be considered formally during staff performance development reviews and finally at exit interviews which are held with all leavers. Staff who raise concerns about working practices at the School to the Designated Safeguarding Lead or an appropriate senior member of Staff will be protected from detriment under this policy.

5. Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. All concerns will be treated in confidence and, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

6. Anonymous Allegations

6.1 This policy encourages a person to put their name to their allegation whenever possible.

6.2 Concerns expressed anonymously are much less powerful but will be considered at the discretion of the School. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

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

- the seriousness of the issues raised
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.
- whether the concern aligns with other known concerns

6.4 An assessment will be made to evaluate the credibility of all anonymous concerns. The person receiving the concern may seek advice on seeking specific information or some initial evidence before a full investigation is launched.

7. Untrue Allegations

If a person makes an allegation frivolously, maliciously or for personal gain, which is intended to harm another person, then disciplinary action is likely be taken against the person. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken. The policy is for genuine concerns and not for personal grievances

8. Support for staff

All staff involved in the whistleblowing process will be supported by the School in a variety of ways. These may include access to counselling and Keeping in Touch (KIT) meetings with colleagues who have no direct involvement in the process. This is especially important if a complaint appears unfounded or is proven malicious.

9. How to Raise a Concern

Stage one

9.1 As a first step, any suspected wrongdoing should be raised with the person's immediate line manager or their superior. This depends, however, on who is suspected of the malpractice. For example, if you believe that your line manager is involved you should proceed directly to stage two of this procedure.

9.2 Concerns may be raised verbally or in writing. A person who wishes to make a written report is invited to use the following format:

- the background and history of the concern (giving relevant dates);
- the reason for concern about the situation

9.3 The earlier concerns are expressed the easier it is to act.

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

9.5 You can expect a response detailing to whom the disclosure has been notified or any action taken within ten working days of your line manager or superior becoming aware of the disclosure.

Stage two

9.6 If no response is forthcoming after ten days from your line manager or superior, if you are not satisfied with the way in which your concern has been handled or if your line manager or superior is involved in the suspected wrongdoing you should notify the Director of People & Operations, the Academic & Pastoral Principal or the Artistic Director as appropriate.

9.7 You can expect a response detailing any action taken within ten working days of the Director People & Operations, the Academic & Pastoral Principal or the Artistic Director becoming aware of the disclosure.

Stage three

9.8 If no such response is forthcoming after ten days from the Director of People & Operations, the Academic & Pastoral Principal or the Artistic Director, or if you are not satisfied with the way in which your concern has been handled or if the Director of People & Operations, the Academic & Pastoral Principal or the Artistic Director is involved in the suspected wrongdoing you should inform the Chief Executive Officer of the disclosure.

9.9 If no such response is forthcoming after ten days from the Chief Executive Officer, or if you are not satisfied with the way in which your concern has been handled or if the Chief Executive Officer is involved in the suspected wrongdoing, you should inform the Chair of Governors of the disclosure.

10. How the School will respond

10.1 The School will respond to the concerns raised in accordance with the stages as set out above.

10.2 Where appropriate, the matters raised may:

- be investigated by management or through the disciplinary process
- be referred to the Police
- be referred to the external auditor
- form the subject of an independent inquiry.

10.3 In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle which the School will bear in mind is what is in the best interest of students or others affected by any possible malpractice. Concerns or allegations which fall within the scope of specific procedures (for example, safeguarding or equal opportunity issues) will normally be referred for consideration under those procedures

10.4 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.

10.5 Within ten working days of a concern being raised, the responsible person will write to:

- acknowledge that the concern has been received
- indicate how we propose to deal with the matter
- give an estimate of how long it will take to provide a final response
- say whether any initial enquiries have been made
- supply information on staff support mechanisms, and
- say whether further investigations will take place and if not, why not.

10.6 The amount of contact with the person considering the issues will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided.

10.7 Where any meeting is arranged with the person raising a concern, this could be held off-site if necessary and the person can be accompanied by a union or professional association representative or a friend.

10.8 The School will take steps to minimise any difficulties which a person may experience as a result of raising a concern.

10.9 The School accepts that the person needs to be assured that the matter has been properly addressed. Thus, subject to legal constraints, they will be informed of the outcome of any investigation. However, sometimes the need for confidentiality may prevent us giving you specific details or the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

11. The Responsible Officer

The Director of People & Operations (who is also the Monitoring Officer) has overall responsibility for the maintenance and operation of this policy. The Director of People & Operations maintains a record of concerns raised and the outcome (but in a form which does not endanger any confidentiality) and will report as necessary to the Board of Governors. The governor with oversight of Whistleblowing is Mary Breen who can be contacted via the Clerk to the Governors (gill.robertson@royalballetschool.org.uk)

12. Relevant external reporting

12.1 This policy is intended to provide a relevant person with an avenue within the School for reporting, investigating and remedying any wrongdoing in the workplace. The School hopes the policy and its procedures will satisfy any person raising a concern that appropriate action has been taken. The law recognises that, in some circumstances, it may be appropriate to report your concerns to a relevant outside body including:

- the local Designated Officer / Local Authority Designated Officer (LADO);
- The NSPCC (the whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk)
- Children's Social Care;
- The Health and Safety Executive;
- The Environment Agency;
- The Information Commissioner;
- The Department for Education;
- The Department for Business, Energy and Industrial Strategy;
- The Charity Commission;
- The Independent Schools Inspectorate (ISI);
- The Office for Standards in Education, Children's Services and Skills (Ofsted);
- The Channel Police Practitioner
- the Police.

12.2 Staff are strongly encouraged to seek advice before reporting a concern to anyone external. In most cases you should not find it necessary to alert anyone external but before you do, as well as considering the internal help and support available which is identified above, please seek external advice from:

13.2.1. Public Concern at Work: If you have any concerns about disclosing a suspected wrongdoing the independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. Staff can call 020 7404 6609 for advice or access their website www.pcaw.gov.org.uk for information.

13.2.2. NSPCC: The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8.00 am to 8.00 pm Monday to Friday) or email help@nspcc.org.uk.

If a person does take the matter outside the School, they should ensure that any disclosure is in the public interest and disclosed to an appropriate prescribed person or body – see Public Concern At Work website given above.

13. Media

You should under no circumstances approach a commercial body or the media with details of the suspected wrongdoing. If you approach any such body and / or where your concern is disclosed in a malicious manner or for personal gain this may make the disclosure unreasonable and the protection given to you by this procedure may be lost. Additionally, the School may consider this to be gross misconduct and disciplinary action may be taken against you.

14. Queries

To obtain advice/guidance on this policy you should contact the People team.