COTTESMORE SCHOOL

CONFIDENTIAL REPORTING POLICY

Cottesmore School seeks to conduct its business honestly and with integrity at all times. However, we acknowledge that all organisations face the risk of their activities going wrong from time to time, or of unknowingly harbouring malpractice. We believe we have a duty to take appropriate measures to identify such situations and attempt to remedy them. By encouraging a culture of openness and accountability within the school, we believe that we can help prevent such situations occurring.

We expect all staff to maintain high standards in accordance with our code of conduct and to report any wrongdoings that fall short of these fundamental principles. It is the responsibility of all employees to raise any concerns that they might have about malpractice within the school. The aim of this policy is to ensure that our employees are confident that they can raise any matters of genuine concern without fear of reprisals, in the knowledge that they will be taken seriously and that the matters will be investigated appropriately and regarded as confidential.

The NSPCC, in conjunction with the Home Office launched a new national helpline in February 2016 and provides advice to employees who feel unable to raise concerns about suspected child abuse internally.

The telephone number is: 0808 800 5000 – the line is available from 10:00 AM to 4:00 PM, Monday to Friday. Or email on help@nspcc.org.uk

This policy should be read in conjunction with the Complaints Policy.

This policy is for guidance only and does not form part of the contract of employment.

Legislative Framework

Confidential Reporting is the disclosure of information by an employee or worker which relates to some danger, fraud or other illegal or unethical conduct in the workplace. The Employment Rights Act 1996 as amended by the Public Interest Disclosure Act 1998 governs the making of disclosures concerning workplace activities and is intended to protect employees who report confidentially on bad practice from being subjected to any detriment or unfairly dismissed as a result.

Personnel Responsible for implementation of Policy

The Proprietor and Headmaster, Tom Rogerson, has overall responsibility for the school's policy on Confidential Reporting. Responsibility for monitoring and reviewing the operation

Reviewed November 2026

Review due November 2027

of the Policy and any recommendations for change within the organisation resulting from the investigations into complaints under the policy lies with the Propietor/Headmaster.

Who is covered by the policy?

This policy applies to all individuals working for the school at every level and grades, whether they are Heads, academic, administrative, maintenance, catering, and housekeeping (collectively known as employees in this policy).

What disclosures are covered?

- This policy is distinct from our Grievance Procedure. If you have a complaint relating to your personal circumstances in the school then you should use the Grievance Procedure. Concerns about malpractice within the school which affects or could affect, for example, parents, members of the public or other members of staff should be raised using the procedure set out in paragraph 6.

You should use this policy if you have a genuine concern that there are reasonable grounds for believing that:

- a) a criminal offence has been committed, is being committed, or is likely to be committed; or
- b) a person has failed, is failing, or is likely to fail to comply with their legal obligation; or
- c) a miscarriage of justice has occurred, is occurring, or is likely to occur; or
- d) the health and safety of any individual has been, is likely to be damaged; or
- e) the environment has been, is likely to be, deliberately concealed.

iii. In the context of Cottesmore School's business, particularly concerns which may fall within the terms of this policy include, for example, (confidentiality, the provision of negligent advice, financial fraud, harassment occurring to others and health and safety). In general, this policy covers actions or omissions you consider are illegal, contrary to policy or established procedure or outside the scope of an individual's authority, actions which could damage Cottesmore School's reputation and conflicts of interest. However, only disclosures concerning those actions falling strictly within the categories in paragraph 4.2 will be eligible for the relevant statutory protection.

- We will value any concerns reported in good faith under this procedure. If you are uncertain whether the matters concerning you are within the scope of this policy (for example, if you are suspicious but uncertain as to whether the law has been broken, or whether a person is acting outside the scope of their authority), we encourage you to report the concerns to the Headmaster in accordance with the procedure set out in paragraph 6.

To whom should a disclosure be made?

- For the purpose of this procedure you are asked, in the first instance, to raise concerns about any form of malpractice falling within the categories outlined in paragraph 4 with the Headmaster/Proprietor. In the absence of the Headmaster, the Deputy Head may nominate another person to carry out the Headmaster's duties under this policy.

- If the disclosure is extremely serious or in any way involves the Headmaster, you should report it directly to Gareth Doodes, the Head of the Governance Advisors (gedoodes@gmail.com).

iii. We will always endeavour to handle investigations promptly and fairly, but if you have made a disclosure under the procedure outlined in paragraph 6 and you are not satisfied with the investigation or its conclusion, you should write directly to the Proprietor detailing your concerns.

- The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any workplace wrongdoing. It is therefore hoped that it will not be necessary for employees to alert external organisations. However, in very serious circumstances, or following an internal report which has not been addressed, we recognise that it may be appropriate for you to report your concerns to an external body, such as a regulator. The government has prescribed a list of appropriate bodies for such external reporting; for example, the Environment Agency and the Health and Safety Executive. A full list is available from an independent charity called Protect, who can be contacted by telephone on 020 3117 2520 (* option 1) or via their website protect-advice.org.uk

How should a disclosure be made?

- You can raise your concerns with the Headmaster orally or in writing. You must state that you are using the Confidential Reporting Policy and specify whether you wish your identify to be kept confidential. The Headmaster will ask you to formalise your concerns in writing either before or after the first meeting. The Headmaster will acknowledge receipt of your formal written disclosure and keep a record of further action taken.
- You are entitled to be accompanied by a workplace colleague or union representative at any meeting with Headmaster (or, if the Headmaster is unavailable, an individual acting in the Headmaster's place) under this procedure. Your companion will be asked to respect the confidentiality of your disclosure and any subsequent investigation.

iii. We recognise that disclosures made under this policy may involve highly confidential and sensitive matters and that you prefer to make an anonymous disclosure. However, we regret that we cannot guarantee to investigate all anonymous allegations. Proper investigations may prove impossible if the investigator cannot obtain further information from you, give you feedback, or ascertain whether your disclosure was made in good faith. It is preferable for

Confidential Reporter's to reveal their identity to the Headmaster and measures can be taken to preserve confidentiality if appropriate (see paragraph 8 on confidentiality).

7. Investigation of Disclosure
8. Cottesmore School is committed to investigating disclosures fully, fairly, quickly and confidentially where circumstances permit. Following your submission of a formal written disclosure, the Headmaster (or another individual acting in his place) will acknowledge receipt within five working days and make appropriate arrangements for investigation.
9. The length and scope of the investigation will depend on the subject matter of the disclosure. In most instances, the Headmaster will carry out an initial assessment of the disclosure to determine whether there are grounds for a more detailed investigation to take place or whether the disclosure is, for example, based on erroneous information. In any event a report will be produced and copies will be provided to the Proprietor and, where appropriate, you will also receive a copy. If you are dissatisfied with the investigation or its conclusion then you should refer to paragraph 5.3.

iii. If a longer investigation is considered necessary, we will usually appoint an investigator or investigation team including personnel with experience of operating workplace procedures or specialist knowledge of the subject matter of the disclosure. For example, if the disclosure concerns financial malpractice, the Bursar may be asked to investigate. Separate personnel will be asked to make a judgement on the report submitted by the investigator (or investigative

team). Recommendations for change will also be invited from the investigative team to enable us to minimise the risk of the recurrence of any malpractice or impropriety which has been uncovered. The Headmaster/Proprietor will then be responsible for reviewing and implementing these recommendations.

- So far as the Headmaster considers it appropriate and practicable, you will be kept informed of the progress of the investigation. However, the need for confidentiality may prevent us giving you specific details of the investigation or actions taken. It is not normally appropriate to set a specific time frame for completion of investigation in advance, as the diverse nature of disclosures contemplated makes this unworkable. We will, however, aim to deal with all disclosures in a timely manner and with due regard to the rights of all individuals involved.
- We recognise that there may be matters that cannot be dealt with internally and in respect of which external authorities will need to be notified and become involved either during or after our investigation. We will endeavour to inform you if a referral to an external authority is about to or has taken place, although we may need to make such a referral without knowledge or consent if we consider it appropriate.

Confidentiality

Every effort will be made to keep the identity of an individual who makes a disclosure under this policy confidential, at least until any formal investigation is under way. In order not to jeopardise the investigation into the alleged malpractice, you will also be expected to keep the fact that you have raised a concern, the nature of the concern and the identity of those involved confidential. There may, however, be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity. This may occur in connection with associated disciplinary or legal investigations or proceedings. If in our view such circumstances exist, we will make efforts to inform you that your identity is likely to be disclosed. If it is necessary for you to participate in an investigation, the fact that you made the original disclosure will so far as is reasonably practicable, be kept confidential and all reasonable steps will be taken to protect you from any victimisation or detriment as a result of having made a disclosure. It is likely, however, that your role as the Confidential Reporter could still become apparent to third parties during the course of an investigation.

Protection and support for Confidential Reporters

- ***No member of staff who raises genuinely-held concerns in good faith, under this procedure, as a result of such action shall face any detrimental repercussions.*** Detriment includes unwarranted disciplinary action and victimisation. If you believe that you are being subjected to a detriment within the workplace as a result of raising concerns under this procedure, you should inform the Headmaster immediately. Employees who victimise or retaliate against those who have raised concerns under this policy will be subject to disciplinary action.
- If an investigation under this procedure concludes that a disclosure has been made maliciously, vexatious, in bad faith or with a view to personal gain, the Confidential Reporter will be subject to disciplinary action. Those choosing to make disclosers without following this procedure or anonymously may not receive the protection outlined in paragraph 9.1

Corrective action and compliance

As part of the investigation into disclosure made under this policy, recommendations for change will be invited from the investigative team to enable Cottesmore School to minimise the risk of the recurrence of any malpractice or impropriety which has been uncovered. The Headmaster will be responsible for reviewing and implementing these recommendations in the future and for reporting on any changes required to the Governance Advisors.

Monitoring and review of Policy

11. This policy reflects the current law and Cottesmore School's practice.

The Headmaster will be responsible for reviewing this policy from a legislative and operational perspective at least annually.

1. The Headmaster has responsibility for ensuring that any personnel who may be involved with administration or investigations carried out under this policy receive regular and appropriate training to assist them with these duties.

Reviewed November 2026

Review due November 2027