



Broomwood Hall Limited & Northcote Lodge School Limited

EXTRACT FROM STAFF EMPLOYMENT POLICIES AND PROCEDURES

Broomwood Prep – Boys, Girls and Broomwood Pre-Prep

Document Control

Owner: Principal, Heads and Director of Human Resources and Compliance

Last Revision: September 2026

Review Date: September 2028

Whistleblowing (procedure for reporting a wrong-doing)

This procedure forms part of your contract of employment.

1. **Wrongdoing at work:** This procedure is designed to allow any wrongdoing at Broomwood to be brought to the attention of the appropriate person and rectified. It is available to all employees who discover something they feel they should pass on. All types of wrongdoing are included, with the exception of those set out in clause 2, whether they are acts committed by fellow employees, faults in Broomwood procedures or oversights which should be rectified. The procedure should be used even in the event that the act or omission causing you concern has finished or has not yet started.
2. **Exceptions:** *The reporting of safeguarding and child protection concerns are exempt from this policy as in all cases the procedure set out within Broomwood's child protection and safeguarding policy should be followed.*
3. **Grievances:** This procedure should **not** however be used where the information you have regarding a wrongdoing relates to a matter which could be raised as a grievance and it is your intention to raise the matter as a grievance. The Grievance Procedure should be used in such cases.

4. **Detriment:** Provided that this procedure is used correctly and you believe the truth of the facts you are reporting, you will not suffer any detriment as a result of reporting the wrongdoing. A failure to follow this procedure may however make the disclosure unreasonable and the protection given to you by this procedure may be lost.

Stage one

5. **Procedure:** You should disclose the suspected wrongdoing first to your line manager. In the event that the line manager is involved in the suspected wrongdoing, you shall be entitled to proceed directly to Stage Two of this procedure.
6. **Response:** You can expect a response detailing to whom the disclosure has been notified or any action taken within 7 days of your line manager becoming aware of the disclosure.

Stage two

7. **Procedure:** If no response is forthcoming after 7 days or if the Line manager is involved in the suspected wrongdoing you shall be entitled to notify the Head of School, Principal or HR.
8. **Response:** You can expect a response detailing any action taken within 7 days of the Head of School, Principal or HR becoming aware of the disclosure.

Stage three

9. **Procedure:** If no such response is forthcoming you should once more inform the Head of School, Principal or HR of the disclosure.

Stage four

10. **Outside body:** If you do not receive a response within 7 days you shall be entitled to notify a relevant and appropriate body outside the School which may include:
- the Health and Safety Executive
 - the Environment Agency
 - the Information Commissioner
 - the Department for Education
 - the Department for Trade and Industry
 - the Police
 - the Commission for Social Care Inspection
11. **Bypassing the procedure:** In extreme circumstances you will have the right to raise your concern directly with a relevant and appropriate outside body without first having followed the stages above. *Such action may however cause damage to Broomwood and its reputation as well as constitute a breach of your own duty of confidentiality towards the School and should only be taken in extreme circumstances and after careful thought.*
12. **Extreme circumstances:** Broomwood will consider extreme circumstances exist where you have a reasonable belief that: Broomwood will subject you to detriment if you inform your line manager; a cover-up is being mounted by the School; or a disclosure made previously to the line manager in accordance with the stages above has not prompted a satisfactory response.
13. **The media:** Even where extreme circumstances are thought to exist, you should under no

circumstances approach a commercial body or the media with details of the suspected wrongdoing. If you approach any such body whether or not your concern is disclosed for personal gain, Broomwood will consider this to be gross misconduct and immediate disciplinary action will be taken against you.

14. **Queries:** If you have any queries about this procedure you should contact HR.