St John Henry Newman

Catholic Primary School

Whistle Blowing Policy and Procedure

Approved: September 2026

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1. Introduction

St John Henry Newman Catholic Primary School is committed to the highest standards of openness, integrity, accountability and professional conduct.

We recognise that employees and other workers are often the first to become aware that something may be seriously wrong within an organisation. However, they may be reluctant to raise concerns because they feel that doing so could be disloyal to colleagues or the school, or because they fear harassment, victimisation or disadvantage.

The school wants all members of staff to feel able to raise genuine concerns without fear of retaliation.

The purpose of this policy is to provide a clear process for raising concerns about serious wrongdoing and to provide appropriate protection for individuals who raise genuine concerns in accordance with the law.

The school would always prefer concerns to be raised at an early stage, when action can be taken promptly.

This policy should be read alongside the school's:

- Child Protection and Safeguarding Policy;
- Staff Code of Conduct;
- Grievance Policy;
- Complaints Policy;
- Disciplinary Policy;
- Health and Safety Policy;
- Safer Recruitment Policy;
- Low-Level Concerns Policy;
- Equality Policy;
- Finance and Financial Procedures.

2. What is Whistleblowing?

Whistleblowing is when a worker reports wrongdoing which they reasonably believe is in the public interest.

Under the Employment Rights Act 1996, workers may receive legal protection when they make a qualifying protected disclosure in accordance with the statutory requirements.

A worker does not need to have proof that wrongdoing has occurred before raising a concern.

They should, however, have a reasonable belief that:

the concern relates to a type of wrongdoing covered by whistleblowing legislation; and

raising the concern is in the public interest.

Government guidance identifies examples including criminal offences, breaches of legal obligations and dangers to health and safety.

The school encourages staff to raise concerns when they have a genuine reason to believe that something may be wrong.

Do not wait for proof before raising a genuine concern.

3. Aims of this Policy

This policy aims to:

- encourage staff to feel confident about raising serious concerns;
- provide clear routes for raising concerns;
- ensure concerns are taken seriously;
- ensure concerns are dealt with fairly and appropriately;
- protect individuals from retaliation or victimisation;
- provide feedback where this can lawfully be given;
- provide routes for concerns to be escalated where necessary;
- ensure safeguarding concerns are acted upon appropriately;
- support a culture of openness and professional accountability.

The school would rather receive a concern which proves to be unfounded than have a genuine concern ignored because an individual was worried about raising it.

4. Scope

This policy applies to:

- employees;
- agency workers;
- casual workers;
- temporary workers;
- contractors;
- consultants working personally for the school;
- volunteers, where appropriate.

The policy does not form part of any employee's contract of employment.

5. What Concerns Can Be Raised Under This Policy?

Whistleblowing may be appropriate where an individual has a genuine concern about serious wrongdoing, including:

Criminal activity

For example:

- fraud;
- theft;
- corruption;
- financial misconduct;
- criminal activity.

Breach of a legal obligation

For example:

- knowingly failing to comply with statutory requirements;
- serious breaches of employment or health and safety legislation;
- deliberate failure to comply with safeguarding requirements.

Health and safety

Concerns about serious risks to:

- pupils;
- staff;
- visitors;
- contractors;
- members of the public.

Safeguarding

Concerns about serious failures in safeguarding practice or systems should be raised immediately.

Where the concern relates directly to the safety or welfare of a child, the school's safeguarding procedures take priority.

Financial malpractice

This may include:

- misuse of school funds;
- fraud;
- theft;
- serious financial irregularity;
- eliberate concealment of financial information.

Environmental damage

Serious concerns about unlawful or significant environmental damage may be raised.

Miscarriage of justice

Concerns that a miscarriage of justice has occurred or is likely to occur.

Improper or unethical conduct

Concerns about serious unethical, improper or dishonest behaviour.

Discrimination

Serious unlawful discrimination or deliberate failure to comply with equality duties may constitute a whistleblowing concern.

Concealment

A concern that information relating to any of the above is being deliberately concealed or that attempts are being made to conceal wrongdoing.

6. Whistleblowing and Safeguarding

Safeguarding concerns require particular attention. If a member of staff believes that:

- a child is at risk of harm;
- safeguarding procedures are not being followed;
- a safeguarding concern is being ignored;
- a member of staff may pose a risk to children;
- safeguarding information is being deliberately concealed;
- the school is failing to take appropriate safeguarding action,

the concern must be raised immediately.

Staff should normally report safeguarding concerns to the **Designated Safeguarding Lead (DSL)** or a Deputy DSL.

If the concern relates to the DSL, the Headteacher should be informed.

If the concern relates to the Headteacher, the Chair of Governors should be contacted.

KCSIE 2026 makes clear that all staff must understand how to raise safeguarding concerns and includes whistleblowing within its safeguarding expectations. It also advises staff that, where they cannot raise a safeguarding concern internally, they can seek independent advice through the NSPCC Whistleblowing Advice Line.

7. What is Not Normally Whistleblowing?

Not every workplace concern is whistleblowing.

The following procedures may be more appropriate:

Grievance

A grievance will normally deal with a concern that primarily affects the individual employee, such as:

- disagreement about working conditions;
- an employment contract;
- workload;
- personal treatment;
- an employment decision;
- bullying or harassment affecting the individual.

Complaints

Concerns raised by parents, pupils or members of the public about the school's services or decisions should normally be dealt with through the school's Complaints Policy.

Disciplinary matters

Concerns about an individual's conduct may need to be dealt with under the school's Disciplinary Policy.

Safeguarding

Concerns about the safety or welfare of a child must be dealt with through safeguarding procedures.

Allegations against staff

Concerns that a member of staff has harmed a child or may pose a risk of harm must be reported immediately through the school's safeguarding procedures.

The fact that another procedure may be more appropriate does not prevent the school from considering whether a concern also amounts to whistleblowing.

8. When in Doubt

Staff do not need to determine for themselves whether a concern legally qualifies as whistleblowing.

If you are unsure, raise the concern with an appropriate person.

The school will determine which procedure is most appropriate.

It is better to raise a genuine concern than to remain silent because you are uncertain about the correct procedure.

9. Protection for Whistleblowers

The school will not tolerate:

- victimisation;
- harassment;
- bullying;
- intimidation;
- discrimination;
- detrimental treatment;
- threats;
- retaliation

against a person who raises a genuine concern under this policy.

Where a disclosure qualifies for statutory protection, the Employment Rights Act 1996 provides legal protection against detrimental treatment and dismissal in specified circumstances.

Any employee who deliberately victimises a colleague because they have raised a genuine concern may be subject to disciplinary action.

This protection applies even where an investigation subsequently finds that the concern was not substantiated, provided the concern was raised genuinely and in accordance with the relevant requirements.

10. Confidentiality

The school will make reasonable efforts to maintain the confidentiality of the person raising a concern.

Information will be shared only with those who need to know in order to respond appropriately.

However, confidentiality cannot always be guaranteed.

There may be circumstances where the identity of the person raising the concern needs to be disclosed, for example:

- where required by law;
- where required as part of legal proceedings;
- where disclosure is necessary to investigate the concern properly;
- where disclosure is necessary to safeguard a child or another person.

Where possible, the school will discuss this with the whistleblower before their identity is disclosed.

11. Anonymous Concerns

Staff are encouraged to identify themselves when raising concerns wherever possible.

Anonymous concerns will nevertheless be considered.

The school will consider:

- the seriousness of the concern;
- the credibility of the information;
- the level of detail provided;
- whether the concern can reasonably be investigated;
- whether there are other sources of evidence.

Anonymous concerns can be more difficult to investigate and it may not be possible to provide feedback to the person who raised them.

12. Raising a Concern

Staff should normally raise concerns as early as possible.

Step 1 – Line Manager

Where appropriate, concerns should initially be raised with the individual's line manager.

Step 2 – Headteacher

If:

- the concern involves the line manager;
- the line manager is unable to respond appropriately;
- the concern involves serious wrongdoing within the school;

the concern should be raised with the **Headteacher**.

Step 3 – Chair of Governors

If the concern involves the Headteacher, or the individual believes that the Headteacher may be involved in the wrongdoing, the concern should be raised with the **Chair of Governors**.

If the Chair of Governors is unavailable or the concern involves the Chair, the concern should be raised with the **Vice-Chair of Governors** or another appropriate member of the Governing Body.

Step 4 – External Advice or Disclosure

Where an individual does not feel able to raise a concern internally, or where they believe that the school's response has been inadequate, they may seek independent advice or make a disclosure to an appropriate prescribed person.

The government maintains an up-to-date list of prescribed persons and the matters that may be reported to them.

13. Concerns About the Governing Body

Where a concern relates to:

- the Chair of Governors;

- the Governing Body as a whole;
- a serious governance matter;

the individual should seek advice from an appropriate external organisation or prescribed person.

Depending on the nature of the concern, this may include:

- the Department for Education;
- the Education and Skills Funding Agency where relevant;
- the Diocese of East Anglia;
- the Local Authority;
- the relevant professional or regulatory body;
- the police;
- the Health and Safety Executive;
- another prescribed person with responsibility for the matter.

14. How to Raise a Concern

Concerns may initially be raised verbally.

However, wherever possible, concerns should subsequently be confirmed in writing.

A written concern should include:

- the background to the concern;
- what is believed to have happened;
- relevant dates;
- relevant locations;
- names of individuals involved where known;
- why the individual believes the matter is serious;
- any evidence available;
- details of any immediate risk;
- any personal interest the individual may have in the matter.

The individual is not expected to prove the allegation.

They should provide sufficient information to allow the concern to be considered properly.

15. Trade Union and Professional Representation

An employee may seek advice from their:

- trade union;
- professional association;
- legal adviser.

An employee may normally request that a trade union or professional representative accompany them to meetings relating to a whistleblowing concern, subject to reasonable arrangements.

16. Initial Assessment

The person receiving the concern will consider:

- whether the matter falls within this policy;
- whether another school procedure is more appropriate;
- whether there is an immediate risk;
- whether safeguarding action is required;
- whether external agencies need to be contacted;
- whether an investigation is appropriate;
- who should undertake the investigation.

Initial enquiries will be undertaken sensitively and confidentially wherever possible.

The person raising the concern will not normally be expected to investigate the matter themselves.

17. Possible Outcomes

Following an initial assessment, the concern may:

- be resolved through management action;
- be investigated internally;
- be referred under the Disciplinary Policy;
- be referred under the Grievance Policy;
- be referred under safeguarding procedures;
- be referred to the police;
- be referred to another external agency;
- require an independent investigation;
- require an external audit or financial investigation;
- be referred to an appropriate regulator;
- be determined not to require further action.

Where urgent action is required, this will be taken before a full investigation is completed.

18. Investigation

Where an investigation is required, the school will determine:

- who will conduct the investigation;
- the scope of the investigation;
- what evidence is required;
- who needs to be interviewed;
- whether external advice is necessary;
- whether any interim measures are required.

The investigation will be conducted fairly and objectively.

The school will seek to ensure that the person who raises the concern and anyone who is the subject of the concern are treated fairly.

Where appropriate, an independent investigator may be appointed.

19. Safeguarding Referrals

If the concern raises a safeguarding issue, the school will follow its Child Protection and Safeguarding Policy.

The DSL will determine whether the matter should be referred to:

- children's social care;
- the police;
- the Local Authority Designated Officer (LADO);
- another safeguarding agency.

The school will not delay safeguarding action because a whistleblowing investigation is taking place.

20. Allegations Against Staff

Where the concern relates to an allegation that a member of staff may have:

- harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child in a way that indicates they may pose a risk of harm;

the school's safeguarding procedures will be followed immediately.

The Headteacher, DSL and other relevant safeguarding professionals will act in accordance with KCSIE and local safeguarding arrangements.

Where the allegation concerns the Headteacher, the Chair of Governors will be informed in accordance with the school's safeguarding procedures.

21. Feedback to the Whistleblower

The school will acknowledge receipt of a concern as soon as reasonably practicable.

Where appropriate, the whistleblower will be informed:

- who is dealing with the concern;
- whether further information is required;
- whether an investigation is taking place;
- whether external agencies have been involved, where appropriate;
- the expected timescale;
- when they can expect further communication.

The school will provide feedback on the outcome where it is lawful and appropriate to do so.

There may be limits on the information that can be shared because of:

- confidentiality;
- employment law;
- data protection;
- safeguarding;

- legal proceedings;
- police investigations.

The school will nevertheless seek to reassure the whistleblower that the concern has been appropriately considered.

22. Timescales

The school will aim to:

- acknowledge receipt of a concern promptly;
- undertake an initial assessment without unnecessary delay;
- identify the appropriate course of action;
- provide reasonable updates during an investigation.

The timescale for an investigation will depend on:

- the complexity of the concern;
- the number of people involved;
- the amount of evidence;
- whether external agencies are involved;
- safeguarding considerations;
- legal or regulatory requirements.

The school will keep the whistleblower informed where appropriate.

23. Unsubstantiated Concerns

A concern being unsubstantiated does not mean that the person who raised it acted improperly.

No disciplinary action will be taken simply because a concern raised in good faith is not substantiated.

However, where an investigation establishes that a concern was deliberately:

- false;
- malicious;
- dishonest;
- vexatious;
- made for personal gain;

the matter may be considered under the school's Disciplinary Policy.

The school will distinguish between a concern that is genuinely mistaken and one that has deliberately been fabricated.

24. Raising a Concern Externally

The school encourages staff to raise concerns internally wherever it is safe and appropriate to do so.

However, workers may have circumstances in which they believe it is appropriate to make a disclosure externally.

A worker seeking to make a protected disclosure should consider the statutory requirements carefully.

The government maintains a list of prescribed persons and bodies to whom disclosures may be made about matters within their areas of responsibility.

Depending on the nature of the concern, relevant external organisations may include:

- Department for Education;
- Local Authority;
- Diocese of East Anglia;
- Ofsted;
- Health and Safety Executive;
- Information Commissioner's Office;
- relevant professional or regulatory bodies;
- police;
- other prescribed persons.

The correct external organisation will depend on the nature of the concern.

Staff should seek independent advice if they are unsure.

25. Independent Advice

Staff may seek independent advice about whistleblowing.

Sources of advice may include:

Protect

Protect provides independent advice to people who are considering raising concerns about serious wrongdoing at work.

Trade Union or Professional Association

Staff may seek advice and support from their recognised trade union or professional association.

Legal Adviser

An individual may seek independent legal advice.

Government Guidance

Current government whistleblowing guidance provides information about protected disclosures and prescribed persons.

26. NSPCC Whistleblowing Advice Line

Where a concern relates specifically to safeguarding children and an individual does not feel able to raise the concern internally, the **NSPCC Whistleblowing Advice Line** can provide advice.

NSPCC Whistleblowing Advice Line: 0800 028 0285

KCSIE 2026 identifies the NSPCC Whistleblowing Advice Line as a route for staff who have safeguarding concerns and feel unable to raise them internally.

27. Protection Against Victimisation

Any attempt to victimise or disadvantage a person because they have raised a genuine concern will be treated seriously.

Examples may include:

- bullying;
- intimidation;
- exclusion;
- threats;
- unfair treatment;
- inappropriate changes to duties;
- detrimental employment treatment;
- harassment.

Such behaviour may constitute misconduct or gross misconduct and may be dealt with under the school's Disciplinary Policy.

28. Record Keeping

The school will maintain appropriate records of whistleblowing concerns.

Records will include, where appropriate:

- the nature of the concern;
- date received;
- person receiving the concern;
- action taken;
- investigation arrangements;
- referrals;
- outcome;
- lessons learned.

Records will be maintained securely and in accordance with data protection requirements.

Access will be restricted to those who have a legitimate reason to access the information.

29. Monitoring

The Headteacher will maintain appropriate oversight of whistleblowing concerns.

Anonymised information may be reported to the Governing Body where appropriate.

Monitoring will consider:

- number and nature of concerns;
- themes or recurring issues;
- actions taken;

- outcomes;
- lessons learned;
- any implications for safeguarding;
- any implications for school policies or procedures.