

St John Fisher Catholic Primary School

WHISTLEBLOWING POLICY



***“With God’s Love we are a family:
Caring, Learning and Growing together”***

	Name of School	St John Fisher Catholic Primary
	Policy Review Date	November 2026
	Date of Next Review	November 2028
	Who reviewed this policy?	Head Teacher and Governors

WHISTLE-BLOWING POLICY

Introduction

Staff, volunteers and others working in or for a school may be the first to become aware that something is seriously wrong. They may be reluctant to speak up because they feel disloyal, or because they are concerned about harassment, victimisation or other negative consequences. This policy is intended to ensure that concerns can be raised safely and that they are considered appropriately.

Whistleblowing is the term used when a worker raises a concern about certain types of wrongdoing in the public interest. A concern may relate to something that has happened, is happening, or is likely to happen.

The Governing Body of St John Fisher Catholic Primary School is committed to high standards of openness, probity, accountability and safeguarding. The school expects workers and others working on its behalf to raise serious concerns rather than ignore them. The school will take reasonable steps to protect people who raise concerns under this policy.

This policy explains how concerns may be raised, how the school will respond and how confidentiality and protection from detriment will be managed.

This policy applies to employees and, where appropriate, agency and temporary workers, contractors, volunteers, governors, work-experience students and others working for or on behalf of the school. The statutory whistleblowing protections available to an individual depend on their employment or legal status.

This policy is in addition to the school's complaints, grievance, disciplinary, safeguarding and other procedures. A concern should be dealt with under the most appropriate procedure, although a concern may also amount to a protected disclosure.

Legislation and guidance

This policy has been developed with regard to the Employment Rights Act 1996, Part IVA (as amended), which provides the statutory framework for protected disclosures and protection from detriment and dismissal where the relevant legal conditions are met.

The policy also reflects the Equality Act 2010 and the Department for Education's Keeping Children Safe in Education 2026. KCSIE 2026 requires staff to act immediately on safeguarding concerns and specifically states that staff who are concerned about safeguarding practice should speak to the DSL or deputy DSL, and may contact the NSPCC Whistleblowing Advice Line if they feel unable to raise the concern internally.

The school will also have regard to relevant Halton Borough Council procedures where these apply to the school, including the Council's current Whistleblowing Policy.

Equality Statement

This policy will operate in accordance with the Equality Act 2010 and the school's commitment to equality, inclusion and respect. No person will be disadvantaged or treated less favourably because they have raised a concern in accordance with this policy.

Aims of this Policy

encourage individuals to feel confident about raising serious concerns and questioning unsafe, unlawful or inappropriate practice;

provide clear routes for raising concerns and ensure that they are considered appropriately;

ensure that individuals receive an acknowledgement and appropriate feedback, subject to confidentiality and legal restrictions;

ensure that concerns are dealt with fairly, consistently and, where appropriate, promptly; and

protect individuals from detriment, harassment or victimisation because they have made a protected disclosure.

Scope of this Policy

Whistleblowing should be distinguished from a grievance. A grievance normally concerns an individual's own employment situation. Whistleblowing concerns wrongdoing or risk that is in the public interest because it may affect other people, the public, pupils, colleagues or the proper operation of the school. Personal grievances should normally be raised under the school's Grievance Procedure unless the circumstances also meet the public interest test.

This policy does not replace other procedures. Depending on the nature of the concern, the appropriate route may include the:

Disciplinary Procedure;

Safeguarding and Child Protection Policy and procedures;

Complaints Procedure;

Grievance Procedure; or

other relevant school, local authority or statutory procedures.

A whistleblowing concern may nevertheless be raised where a person believes that an appropriate procedure has not been followed or that serious wrongdoing is not being addressed.

What concerns may be raised?

A concern may fall within whistleblowing where the person raising it reasonably believes that it is in the public interest and that it tends to show one or more of the following:

a criminal offence has been committed, is being committed or is likely to be committed;

a person has failed, is failing or is likely to fail to comply with a legal obligation;

a miscarriage of justice has occurred, is occurring or is likely to occur;

someone's health or safety is endangered;

damage to the environment has occurred, is occurring or is likely to occur;

sexual harassment has occurred, is occurring or is likely to occur;

information tending to show any of the above is deliberately concealed;

fraud, bribery, corruption, theft, financial irregularity, misuse of school resources or other financial wrongdoing;

serious safeguarding or child protection concerns, including concerns about how safeguarding practice is being managed; or

other serious wrongdoing or malpractice which may be in the public interest.

This list is not exhaustive. Individuals do not need to prove that the concern is true before raising it. They should provide as much relevant information as they reasonably can and explain why they believe there are reasonable grounds for concern.

Safeguards and Protection

The school recognises that raising a concern can be difficult. The school will not tolerate harassment, victimisation, bullying, disadvantage, detrimental action or deliberate failure to act against someone because they have raised a concern or made a protected disclosure.

Where an allegation is investigated and is not substantiated, this will not in itself result in action against the person who raised the concern, provided they raised it with a reasonable belief that it was in the public interest. However, knowingly false, malicious or deliberately vexatious allegations may be addressed under the appropriate school procedure.

The school will consider whether any reasonable steps are needed to support a person who has raised a concern, including allowing them to be accompanied at relevant meetings by a trade union or professional association representative or a work colleague, where appropriate.

Confidentiality

The school will make reasonable efforts to keep the identity of the person raising a concern confidential where this is requested. However, confidentiality cannot always be guaranteed. There may be circumstances in which information, including identity, must be disclosed because of legal requirements, safeguarding duties, police involvement, disciplinary proceedings or because disclosure is necessary to investigate the concern fairly.

Where practicable and appropriate, the person who raised the concern will be informed if their identity needs to be disclosed. Information relating to investigations will be handled securely and shared only with those who need it for a legitimate purpose.

Anonymous Allegations

Individuals are encouraged to identify themselves when raising a concern because this enables the school to seek clarification, provide support and give appropriate feedback. Anonymous concerns will nevertheless be considered where there is sufficient information to justify doing so.

When deciding how to respond to an anonymous concern, the school may consider the seriousness of the issue, the credibility and detail of the information provided, and whether the concern can be investigated or corroborated from other sources.

How to Raise a Concern

A concern should normally be raised with the person's immediate line manager, Headteacher or, where appropriate, the Designated Safeguarding Lead (DSL) or Deputy DSL.

Where the concern relates to a particular person, the person raising the concern should choose an alternative route where necessary. For example:

a concern about another member of staff may be raised with the Headteacher or DSL, depending on the nature of the concern;

- a concern about the Headteacher may be raised with the Chair of Governors;
- a concern about the DSL may be raised with the Headteacher or Chair of Governors;
- and
- a concern about the Chair of Governors should be raised through an appropriate external route, including a relevant prescribed person or body where applicable.

The school's current contact details for raising concerns are:

Mrs N Dickinson – Headteacher: 0151 424 7794 |
head.stjohnfisher@haltonlearning.net

Mrs Felicity Cunliffe – Chair of Governors: cog@sjfprimary.co.uk

Designated Safeguarding Lead / Deputy DSL: as identified in the school's current Safeguarding and Child Protection Policy.

Concerns may be raised verbally or in writing. Written concerns should, where possible, include:

- the background and history of the concern, including relevant dates;
- what is believed to have happened or may happen;
- why the person believes the matter is serious and, where relevant, in the public interest; and
- any supporting information or documents that can reasonably be provided.

Individuals may seek advice from their trade union, professional association, Acas or Protect. They may also be accompanied by a trade union or professional association representative or work colleague at meetings relating to the concern, where appropriate.

Individuals should normally raise concerns internally wherever possible. A worker may also raise a protected disclosure with an appropriate prescribed person or body where the legal requirements for doing so are met. The current GOV.UK list of prescribed persons and bodies should be consulted for the relevant organisation.

If the concern relates to safeguarding practice and the individual feels unable to raise it internally, they can contact the NSPCC Whistleblowing Advice Line on 0800 028 0285. This is the route identified in KCSIE 2026 for professionals who have concerns about how child protection issues are being handled.

How the School will Respond

A responsible person will be identified to consider and, where appropriate, coordinate the response to the concern. The person responsible will be independent of the matter where reasonably practicable and appropriate.

Depending on the circumstances, the concern may be:

- considered or investigated by the Headteacher or Senior Leadership Team;
- referred for an internal audit or financial investigation;
- progressed under an appropriate school procedure;
- referred to the police or another statutory agency;
- referred to an external auditor or other relevant professional/regulatory body;

subject to an independent investigation; or
dealt with under safeguarding, disciplinary, grievance, complaints or another appropriate procedure.

An initial assessment will normally be undertaken to determine the appropriate response and whether a full investigation is required. This initial assessment does not imply that the concern has been accepted or rejected.

Where reasonably practicable, within five working days of a concern being raised, the person raising it will receive written acknowledgement confirming that the concern has been received and, where appropriate, outlining:

- how the matter is proposed to be handled;
- whether any initial enquiries have been made;
- an indicative timescale for further action or a final response;
- available staff support mechanisms, where appropriate; and
- whether further investigation is proposed, or why no further action is considered necessary.

The school will keep the person who raised the concern informed as far as it reasonably can. The amount of contact will depend on the nature and complexity of the matter. Information cannot be shared where doing so would breach another person's confidentiality, prejudice an investigation, or be contrary to a legal or safeguarding requirement.

If a formal investigation is required, it will be conducted under the school's relevant procedure, which may include the Disciplinary Procedure or safeguarding procedures.

If urgent action is required, particularly in relation to safeguarding, child protection, health and safety or suspected criminal activity, the school will take appropriate immediate action before or alongside any wider investigation.

The Responsible Officer

The Headteacher and Governing Body have overall responsibility for the implementation and oversight of this policy. A named responsible person may be delegated responsibility for receiving, recording or coordinating a concern, provided that appropriate confidentiality and independence are maintained.

Records of whistleblowing concerns and actions taken will be kept securely and in accordance with the school's data protection and records management requirements. Records will be retained only for as long as necessary and will not compromise confidentiality.

How the Matter can be Taken Further

The school hopes that concerns can be resolved through appropriate internal action. If a person believes that their concern has not been taken seriously, has not been addressed appropriately or that the wrongdoing is continuing, they may seek further advice and, where the legal requirements are met, make a disclosure to an appropriate prescribed person or body.

Possible sources of further advice or external reporting include:

the NSPCC Whistleblowing Advice Line for concerns about child protection or safeguarding practice;

relevant professional or regulatory bodies;

the police, where a criminal offence may have occurred;

the relevant external auditor, where appropriate;

a relevant prescribed person or body listed by GOV.UK;

Acas, for employment-related advice; and

Protect, an independent whistleblowing charity providing confidential advice.

Workers should seek appropriate advice before making an external disclosure where they are unsure about the correct route or the legal protections that may apply. GOV.UK guidance on whistleblowing and the current list of prescribed persons and bodies should be used because these routes may change.

Review

This policy will be monitored to ensure consistent application, effective protection for people raising concerns and compliance with relevant equality duties.

The policy will be reviewed at least every two years, or sooner if there are significant changes to legislation, statutory guidance, safeguarding requirements or local procedures.

The policy will be reviewed by the Headteacher and Governing Body and, where appropriate, in consultation with recognised trade unions.

Records of whistleblowing disclosures, including anonymous concerns, will be maintained securely and reviewed as necessary to identify any learning or procedural improvements.

Key External Guidance

GOV.UK – Whistleblowing guidance for employers:

<https://www.gov.uk/guidance/whistleblowing-guidance-for-employers>

GOV.UK – Whistleblowing for employees: <https://www.gov.uk/whistleblowing>

GOV.UK – Keeping Children Safe in Education 2026:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

GOV.UK – List of prescribed people and bodies:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>

NSPCC Whistleblowing Advice Line: 0800 028 0285