



# **Whistle Blowing Policy** **and Procedures**

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| <b>Ownership:</b> | <b>Finance &amp; Personnel Committee</b> |
| Document Date:    | Summer 2026                              |
| Review Date:      | Summer 2027                              |
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Pupils in St Margaret Clitherow Catholic Primary School are happy, confident and very proud of their school. They clearly understand their mission statement, 'Jesus lives in us, our families, our school, our church, our world. Jesus is our guide, let us follow Him.' They can quote scripture to give examples of how they do their best to follow Jesus every day. Pupils explain that if they ever feel worried about something they are confident that adults will help them in a discreet and caring way. They are fully aware of their responsibilities towards the more vulnerable members of society and can reference Catholic social teaching when discussing their work with the local foodbank.

## **Catholic Schools Inspectorate October 2024**

Pupils enjoy school. They respond well to the high expectations of staff. Pupils strive to do their best and achieve well. Pupils are extremely kind and caring. They frequently give up their free time to help each other. Lessons are free from disruption and lunchtimes are a buzz of happy and harmonious play.

## **Ofsted May 2024**

*At St Margaret Clitherow School we are committed to Safeguarding Children*

*Jesus lives in us, our families, our school, our Church, our world. Jesus is our guide,  
let us follow Him*

## **1. Introduction**

The aim of this Policy is to encourage employees and others who have serious concerns about any aspect of the School to voice those concerns and feel secure in doing so.

It is important that any fraud, misconduct or wrongdoing is reported and properly dealt with. The School encourages all individuals to raise any concerns they may have about the conduct of others or the way in which the School is run.

The School is committed to the principles of honesty and integrity. A culture of openness and accountability is critical to ensuring these values are authentically lived by.

This policy applies to all employees, workers, agency staff, contractors, service providers, volunteers, and governors of the School.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

## **2. Scope**

If your concern relates to how you have been treated this should be raised under the grievance or bullying and harassment policies.

The whistleblowing policy will not replace any existing policies or procedures. If misconduct is discovered as a result of any investigation under this policy the School's disciplinary policy will be used.

The School encourages individuals to disclose any concerns they may have regardless of whether they are covered by this or another policy.

## **3. What is whistleblowing?**

Whistleblowing means the reporting of information which relates to actual or suspected wrongdoing related to a "qualifying disclosure".

Qualifying disclosures are disclosures of information where the worker reasonably believes (and it is in the public interest) that one or more of the following matters is either happening, has taken place, or is likely to happen in the future.

- A criminal offence
- The breach of a legal obligation
- A miscarriage of justice
- A danger to the health and safety of any individual
- Damage to the environment
- Deliberate attempt to conceal any of the above.

Whistleblowing also applies to unsafe or poor practice that may put children at risk, breaches of safeguarding procedures and failure to comply with statutory requirements.

If a worker is going to make a disclosure it should be made to the employer first, or if they feel unable to use the organisations procedure the disclosure should be made to a prescribed person, so that employment rights are protected.

It is not necessary for a whistleblower to have proof of such an act for the protections of this policy to apply.

Potential whistleblowers are encouraged to seek support from a senior manager or their trade union representative if they are unsure whether to make a disclosure or to access support in making a disclosure, regardless of whether it is qualifying or not.

#### **4. Protections for whistleblowers**

This policy has been written to take account of the Public Interest Disclosure Act 1998 and other relevant legislations, which protects workers making disclosures.

A qualifying disclosure made to the worker's employer is a protected disclosure. A qualifying disclosure made by a worker under this policy will also be a protected disclosure.

A whistleblower who makes a protected disclosure has the right not to be dismissed (if they are an employee) or subjected to any other detriment, because they have made a protected disclosure.

Dismissing, or subjecting a whistleblower to any other detriment for raising a protected disclosure, such as demotion, or harassment or sexual harassment or victimisation (under the Worker Protection Act 2024) will be a disciplinary offence.

We will not determine that anyone should cease to work at the school on the basis that they have made a qualifying disclosure in accordance with the law and this policy.

Whistleblowers may seek support and advice from organisations such as the whistle blowing charity Protect (<https://protect-advice.org.uk> / 020 3117 2520) or ACAS ([www.acas.org.uk](http://www.acas.org.uk)).

#### **5. Obligations for the whistleblower**

You are encouraged to raise potential whistleblowing concerns as early as possible and to follow the whistleblowing procedure set out in this policy.

An instruction to cover up wrongdoing is a disciplinary offence. A whistleblower who is told not to raise or pursue any concern, even by a person in authority, should not agree to remain silent.

Whistleblowing to an external agency without first using the procedure below may be considered a breach of our Code of Conduct. However, should an employee feel unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed they should use the other channels open to them (as detailed in Section 11 below)

It is not appropriate to whistle blow to the media except in limited circumstances and where those circumstances do not apply such whistleblowing may be considered gross misconduct.

Maliciously making a false allegation is a disciplinary offence.

#### **6. Confidentiality**

The School encourages individuals to voice their concerns openly. If anyone wishes to raise concerns confidentially, the School will make every effort to keep their identity secret.

The School will consult with the whistleblower before divulging their identity to any party, including an investigator.

The School does not encourage anonymous disclosures as this may makes it harder to establish the credibility of an allegation and may make investigation difficult or impossible. Anonymous concerns will be taken seriously and investigated as far as is possible under this policy.

#### **7. The School's commitment**

Any matter raised under this policy and procedure will be investigated thoroughly, promptly and confidentially.

## **8. Obligations for the Governing Board**

An appropriate representative of the School (Headteacher or named governor) will inform Hertfordshire County Council as the maintaining authority of any qualifying disclosures at the earliest opportunity.

Concerns regarding financial irregularity will be reported to the Shared Internal Audit Service (SIAS); where concerns relate to child protection these will be handled in keeping with the relevant policy of the School and reported to the Local Authority Designated Officer (LADO) where the threshold is met.

## **9. Whistleblowing procedure**

### **9.1. Stage 1 – Disclosure**

You should initially raise your concern with your line manager. You may do this orally or in writing. Your line manager should then inform the headteacher of the concern.

If the concern relates to your line manager or any person to whom you report (other than the headteacher) you should raise the issue with the headteacher.

If the concern relates to the headteacher, you should raise this with the named governor, (e.g. Chair of Governors)

We aim to acknowledge your concern within 5 working days during term time, this may be longer during school closure periods.

Where external agencies such as LADO and Police are involved schools will follow their advice and this may delay the internal investigation.

### **9.2. Stage 2 – Investigation**

The headteacher will arrange an investigation into the concerns raised, unless the concern relates to the headteacher, in which case the investigation will be arranged by the named governor. This will take place as soon as is reasonably practicable.

The investigation may involve you, and other individuals involved, meeting with the investigator and giving a written statement.

At any investigatory meetings you are entitled to be accompanied by a recognised trade union representative or a work colleague.

Whilst the person carrying out the investigation will aim to keep the whistle-blower informed of the progress of the investigation and likely timescales, sometimes the requirement for confidentiality will prevent full information about the investigation and any consequential disciplinary action from being disclosed.

### **9.3. Step 3 – Report to Headteacher/Governors**

The investigator will report to the named representative of the Governing Board before any further action is taken. The representative of the Governing Board will decide on potential outcomes including, but not limited to:

- invoking the School's disciplinary process, or other relevant policy
- referral to the police, Hertfordshire County Council department, government department or regulatory agency
- no further action.

On conclusion of any investigation, the whistleblower will, as far as is practicable and where it is reasonable to do so, be told the outcome of the investigation and what the School has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

#### 9.4. Step 4 – Escalation.

If, on conclusion of stages 1, 2 and 3 you believe that the appropriate action has not been taken, you should report the matter to the proper authority. The Public Interest Disclosure (Prescribed Persons) Order 2014 (as amended) sets out a number of bodies prescribed by the Secretary of State to which qualifying disclosures may be made. In order for the report to one of these bodies to be a protected disclosure, you must reasonably believe that the matter falls within the matters covered by that body. You must also reasonably believe that the information disclosed, and any allegations contained in it, are substantially true.

These bodies include:

- the Financial Conduct Authority
- the Health and Safety Executive
- the Environment Agency
- His Majesty's Chief Inspector of Education Children's Services and Skills
- the Secretary of State for Education
- the Office of Qualifications and Examinations Regulation
- the Equality and Human Rights Commission.
- LADO

A full list can be obtained from the charity Protect or the Department for Business and Trade (DBT) on the website [Whistleblowing: list of prescribed people and bodies - GOV.UK](#). The DBT list contains a description of the matters covered by each prescribed body. Alternatively, you may contact their professional association or trade union representative for guidance.

#### 10. Data Protection

When an individual makes a disclosure, the school will process any personal data collected in accordance with its data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

#### 11. Contacts

##### **SCHOOL**

|                     |                                                                                  |
|---------------------|----------------------------------------------------------------------------------|
| Headteacher:        | Carmela Puccio                                                                   |
| Tel:                | 01438 352863                                                                     |
| Email:              | <a href="mailto:head@clitherow.herts.sch.uk">head@clitherow.herts.sch.uk</a>     |
| Chair of Governors: | Elizabeth King                                                                   |
| Tel:                | 01438 248863                                                                     |
| Email:              | <a href="mailto:e.king@clitherow.herts.sch.uk">e.king@clitherow.herts.sch.uk</a> |

##### **Director of Education**

##### **WESTMINSTER DIOCESE EDUCATION SERVICE**

Vaughan House  
46 Francis Street London SW1P 1QN  
020 7798 9005

**Herts HR (HCC)**  
Assistant Director  
Tel: 01992 556653

**Herts for Learning**  
Head of HR  
Tel: 01438 844873

**Legal, Member & Statutory Services**  
Chief Legal Officer  
Tel: 01992 555527

**County Internal Audit**  
Head of Assurance Services  
Tel: 01438 845502

**NSPCC:**  
[help@nspcc.org.uk](mailto:help@nspcc.org.uk)  
0808 800 5000

**EMERGENCY SERVICES: 999**

**Hertfordshire Safeguarding Children Board Team**  
County Hall  
Phone: 01992 588757

**Herts HR (for Maintained Schools and ESCs)**  
Assistant Director  
Tel: 01992 556653

**Legal, Member & Statutory Services -**  
Chief Legal Officer  
Tel: 01992 555527

**County Internal Audit**  
Head of Assurance Services:  
Tel: 01438 845502

Or via your professional association or trade union representative.

Or the independent whistleblowing charity Public Concern at Work;  
Helpline (020) 7404 6609  
E-mail: [whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk)