St Peter &
St Paul School

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Whistleblowing Policy

This policy is relevant to the whole school including EYFS.

Contents

1 Purpose and principles
2 Legal framework
3 Scope
4 Meaning of whistleblowing
5 Matters covered by this policy
6 Matters dealt with under other procedures
7 Safeguarding and child protection concerns
8 How to raise a concern.
9 Confidentiality and anonymous disclosures
10 How the School will respond.
11 Protection and support
12 Knowingly false or malicious allegations
13 External disclosures and independent advice
14 Records, data protection, and oversight
15 Policy review

1 Purpose and principles

St Peter & St Paul School and its Trustee Board are committed to openness, honesty, integrity, and accountability. Everyone working for or on behalf of the school has a key role in identifying and reporting wrongdoing, unsafe practice and failures that may affect pupils, staff, the wider school community, or the public.

The purpose of this policy is to provide a clear and safe way to raise concerns and to ensure that concerns are considered fairly, promptly and by an appropriate person. The school will take genuine concerns seriously and will not tolerate retaliation or victimisation against anyone who raises a qualifying concern.

This policy is intended to encourage concerns to be raised at the earliest reasonable opportunity. A person does not need proof before raising a concern but must have a reasonable belief that the information tends to show wrongdoing or a serious risk.

2 Legal framework

This policy has regard to the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998, and to Keeping Children Safe in Education 2026.

It should be read alongside the School's Child Protection and Safeguarding Policy, Staff Code of Conduct, Grievance, Complaints and Disciplinary Procedures.

Statutory whistleblowing protection applies where both the person making the disclosure and the disclosure itself meet the relevant legal requirements. The school nevertheless permits everyone identified in section 3 to use this procedure, whether or not they would ultimately fall within the statutory definition of a worker.

3 Scope

This policy applies across the whole School, including the Early Years Foundation Stage. It may be used by employees, workers, trustees, volunteers, agency staff, trainees, contractors, consultants and others working for or on behalf of the school.
The Trustee Board has overall responsibility for this policy and for oversight of the school's whistleblowing arrangements. The Headteacher has operational responsibility, except where the Headteacher is involved in the concern or there is another conflict of interest.

4 Meaning of whistleblowing

Whistleblowing is the disclosure of information which a person reasonably believes tends to show specified wrongdoing and is made in the public interest. The concern will usually relate to something witnessed or discovered through work, although this is not essential.
The public-interest requirement normally means that the concern affects, or could affect, other people rather than being solely a personal employment complaint. A concern may relate to conduct that happened in the past, is happening now or is likely to happen in the future.

5 Matters covered by this policy

A qualifying concern may relate to:
- a criminal offence, including fraud, theft, bribery, or corruption.
- a failure to comply with a legal or regulatory obligation.
- a miscarriage of justice.
- danger to the health or safety of any person.
- damage, or risk of damage, to the environment.
- sexual harassment.
- serious safeguarding failures, unsafe practice or a failure to protect children.
- serious financial mismanagement or misuse of charitable or school funds.
- a serious breach of professional standards, the Staff Code of Conduct or another requirement affecting the public interest; or
- the deliberate concealment of information relating to any of the above.

This list is not exhaustive. Where a concern does not meet the legal definition of a protected disclosure, the school may still consider it under this policy or direct it to another appropriate procedure.

6 Matters dealt with under other procedures

A personal complaint about an individual's own employment, working relationships or treatment will normally be considered under the Grievance Procedure. A complaint from a pupil or parent will normally be considered under the relevant complaint's procedure.
Concerns about an individual's conduct that do not meet the public-interest test may be considered under the Staff Code of Conduct, Low-Level Concerns Policy or Disciplinary Procedure.
The same facts may engage more than one procedure. The school will not reject or reclassify a concern simply to remove whistleblowing protection. Where another procedure is more appropriate, the person raising the concern will be told, so far as possible, how the matter will be handled.

7 Safeguarding and child protection concerns

This policy does not replace the school's safeguarding reporting arrangements. Anyone who has a concern about the welfare or safety of a child must take immediate action in accordance with the Child Protection and Safeguarding Policy.

Concerns about a child should be reported promptly to the Designated Safeguarding Lead or a deputy.

- A concern or allegation that an adult working with children may have harmed a child, may pose a risk of harm, may have committed a relevant criminal offence or may be unsuitable to work with children must be reported through the school's allegations procedure.
- A concern or allegation about the Headteacher should be reported to the Chair of Trustees. Where reporting to the Headteacher or Chair would create a conflict of interest, the matter should be reported to the appropriate alternative person under section 8 or directly to the Local Authority Designated Officer where appropriate.
- A low-level concern about an adult should be shared in accordance with the School's Low-Level Concerns Policy.

If a child or another person is in immediate danger, the police or local children's social care should be contacted without delay.

8 How to raise a concern.

A concern may be raised orally or in writing. A written disclosure is encouraged because it helps the school understand the concern and maintain an accurate record, but a person will not be prevented from raising a concern orally.
The person should provide as much factual information as reasonably available, including relevant dates, people, events and supporting material. They are not expected to investigate the matter themselves.

Nature of concern	Normal reporting route
General concern	The individual's line manager or the Headteacher
Concern involving the line manager	The Headteacher
Concern involving the Headteacher	The Chair of Trustees
Concern involving the Chair	The Vice-Chair or another independent trustee nominated for this purpose
Concern involving several trustees or the Board collectively	The Vice-Chair, an independent professional adviser or an appropriate external body
Immediate safeguarding or criminal risk	The safeguarding or emergency routes in section 7, without waiting for the internal process

A person may use a higher or alternative route where they reasonably believe the normal route is inappropriate, compromised or unsafe. Anyone who receives a disclosure must treat

it seriously, preserve confidentiality and refer it promptly to the appropriate decision-maker. It must not automatically be referred to a person who is implicated in the concern.

A person raising a concern may be accompanied at a meeting by a trade union representative or workplace colleague, provided that this does not create a conflict of interest or prejudice the investigation.

9 Confidentiality and anonymous disclosures

The school encourages people to identify themselves because this enables questions to be asked, evidence to be clarified and appropriate support to be offered. A person may provide their identity while requesting that it is kept confidential.

The school will protect the identity of the person raising the concern so far as this is lawful and reasonably practicable. Absolute confidentiality cannot be guaranteed where disclosure is required by law, necessary to protect a child or another person, required by a regulator or public authority, or necessary for a fair investigation or legal proceedings. Where practicable, the school will discuss any necessary disclosure of identity with the person beforehand.

Anonymous concerns will not be rejected merely because they are anonymous. The school will consider the seriousness and credibility of the information, the safeguarding or public-interest risk, whether the information can be verified and whether a fair investigation is possible. Anonymous reporting may, however, limit the school's ability to investigate, provide feedback or establish whether later treatment was connected to the disclosure.

10 How the School will respond.

The person receiving the concern will ensure that any immediate safeguarding, safety, evidence-preservation or reporting action is considered and actioned where necessary before the wider investigation begins.

The school will normally formally acknowledge a disclosure within five working days and, where practicable, arrange an initial discussion within ten working days.

Urgent concerns will be addressed immediately.

These timescales may be adjusted where the matter is complex, external agencies are involved or taking a particular step could prejudice an investigation.

An initial assessment will determine:
- whether the matter falls within this policy or should be handled under another procedure.
- whether interim safeguarding, safety or management measures are required.
- whether the matter should be referred to the police, Local Authority Designated Officer, children's social care, a regulator or another authority.
- the appropriate scope and form of investigation; and
- who can investigate impartially and without a conflict of interest.

The investigation may be conducted by an appropriate senior employee, one or more trustees or an independent external investigator. A person implicated in the concern will not decide how it is investigated or take part in determining its outcome.

The person raising the concern will be kept reasonably informed about progress and likely timescales. The school may be unable to provide detailed information about another person's

employment, disciplinary action, personal data or confidential safeguarding information. The person raising the concern must also maintain appropriate confidentiality while the matter is being considered.

When the process concludes, the school will confirm this and provide as much information about the outcome as it lawfully and fairly can. The person raising the concern does not have a right to direct the investigation or determine its outcome.

There is no formal appeal against the findings of a whistleblowing investigation. However, a person who reasonably believes that their concern was not properly considered may request a review by someone who was not previously involved or may seek independent advice or approach an appropriate external body.

11 Protection and support

The school will support a person who raises a genuine concern on reasonable grounds, even if the concern is not substantiated. No person will be subjected to dismissal, disciplinary action, threats, intimidation, bullying, exclusion, loss of opportunities, detrimental changes to duties or any other retaliation because they have made a protected disclosure.

Anyone who threatens, victimises or retaliates against a person for raising a concern may be subject to disciplinary or other appropriate action. A person who believes they have suffered retaliation should report this immediately to the Headteacher, Chair of Trustees or the appropriate alternative contact in section 8.

Nothing in a confidentiality clause, settlement agreement or other internal requirement prevents a worker from making a protected disclosure to a person or body permitted by law. The school will not obstruct a person from obtaining confidential legal advice, contacting their trade union or seeking independent whistleblowing advice.

12 Knowingly false or malicious allegations

No action will be taken against a person merely because a concern is mistaken, cannot be proven or does not result in formal action, provided it was raised on reasonable grounds. If, following fair consideration, the school concludes that an employee knowingly made a false allegation or acted maliciously, the matter may be considered under the Disciplinary Procedure. Equivalent proportionate action may be considered for a worker, trustee, volunteer, contractor or other person. This provision must not be used to discourage genuine concerns.

13 External disclosures and independent advice

The school encourages concerns to be raised internally where the person feels able to do so because this may allow the matter to be addressed promptly. However, a person is not required in every case to exhaust the internal procedure before seeking advice or making a disclosure to an appropriate external body.
A person considering an external disclosure should ensure that the recipient is appropriate for the subject of the concern and should consider taking independent advice. Depending on the matter, relevant routes may include:

- Protect, the independent whistleblowing charity, at www.protect-advice.org.uk.
- a trade union or independent legal adviser.
- the NSPCC Whistleblowing Advice Line for child welfare and protection concerns, on 0800 028 0285 or help@nspcc.org.uk.

• the Local Authority Designated Officer, children's social care or the police where safeguarding or immediate risk is involved.
• the Charity Commission, Information Commissioner's Office, Health and Safety Executive, HM Revenue and Customs or another prescribed person with responsibility for the relevant subject; and the current government list of prescribed people and bodies.

The NSPCC advice line is available from 8.00am to 8.00pm Monday to Friday and from 9.00am to 6.00pm at weekends. It is an alternative route for staff who feel unable to raise child-protection failures internally or are concerned about the way a safeguarding concern is being handled.

The legal conditions for a wider disclosure, including disclosure to the media, are more demanding and such a disclosure may not be protected. Anyone considering this step is strongly encouraged to obtain independent legal advice. The school will not take disciplinary action merely because a person has made a legally protected external disclosure.

14 Records data protection and oversight

The school will keep appropriate records of disclosures, assessments, investigations, decisions and actions. Records will be accurate, stored securely, retained in accordance with the school's retention arrangements and accessible only to those who need the information for a legitimate purpose.
Personal data will be handled in accordance with applicable data-protection law and the school's data-protection policies. Records will distinguish clearly between an allegation, evidence obtained and any finding reached.
The Trustee Board will receive appropriate anonymised information about the number and nature of concerns, how they were handled, any themes identified and any action required. Reporting must not reveal the identity of individuals unnecessarily. A trustee or employee implicated in a concern will not participate in its oversight or investigation.

Where the School is required to make a safeguarding, regulatory, charity serious-incident or other external report, it will do so without unreasonable delay.

15 Policy review

The Trustee Board will review this policy by September 2028. It will be reviewed sooner where there is a relevant change in legislation, statutory guidance, contact arrangements, school governance or learning arising from a concern or investigation.