

St. Joseph's R.C. Primary School and Nursery



Whistleblowing Policy

September 2026

Review: July 2027

Policy Review

This policy will be reviewed in full by the Governing Body on an annual basis.

The policy was last reviewed and agreed by the Governing Body in September 2026

It is due for review in July 2027.

Hayley Francis

Date: September 2026



Head Teacher

Mrs Lindsay Wise

Date: September 2026



Chair of Governors

1. Purpose of this policy

St Joseph's RC Primary School and Nursery is committed to maintaining a culture in which staff, volunteers, governors and other workers feel able to raise genuine concerns about wrongdoing, unsafe practice, unlawful conduct or serious failures without fear of unfair treatment or victimisation.

The school expects everyone working in or with the school to act professionally, honestly and in the best interests of children and young people.

Whistleblowing is an important part of maintaining effective governance, safeguarding, financial accountability and professional standards.

This policy explains:

- what whistleblowing means;
- the types of concerns that may be raised under this procedure;
- how concerns should be raised;
- who concerns can be raised with;
- what protection is available to people who raise concerns;
- what happens after a concern has been raised; and
- how concerns can be raised outside the school where necessary.

This policy should be read alongside the school's Safeguarding and Child Protection Policy, Complaints Policy, Grievance Procedure, Disciplinary Procedure, Staff Code of Conduct and other relevant school procedures.

2. Legal, statutory and Catholic governance framework

This policy has regard to:

- the Public Interest Disclosure Act 1998;
- the Employment Rights Act 1996, including statutory protection for protected disclosures;
- Keeping Children Safe in Education 2026;
- Department for Education guidance on whistleblowing procedures for maintained schools;
- relevant safeguarding legislation and guidance;
- relevant Catholic Education Service guidance; and
- the governance and safeguarding arrangements of the Archdiocese of Cardiff- Menevia

As a Catholic Voluntary Aided maintained school, the school operates within the statutory maintained-school framework and within the governance and canonical arrangements of the Catholic Church.

The governing body is responsible for agreeing and establishing the school's whistleblowing procedure.

The school will work appropriately with the Archdiocese of Cardiff- Menevia and its officers where a whistleblowing concern has implications for safeguarding, the Catholic character or mission of the school, governance, senior leadership, compliance with diocesan requirements or other matters within the Diocese's remit.

The Governing Body is responsible for agreeing and establishing the school's whistleblowing procedure.

3. What is whistleblowing?

Whistleblowing is where a worker raises a concern about suspected wrongdoing or malpractice which is in the public interest.

A person does not need to have proof that wrongdoing has occurred before raising a concern. However, they should have a reasonable belief that the information they are disclosing tends to show relevant wrongdoing and that the disclosure is in the public interest.

A concern may still be raised even if it subsequently turns out that the concern was mistaken.

Whistleblowing is different from a personal grievance or complaint.

For example:

- a concern about an individual's own pay, workload or employment treatment would normally be dealt with under the school's grievance procedure;
- a concern that the school is systematically failing to comply with employment law may potentially constitute whistleblowing;
- a safeguarding concern about a child should be raised immediately in accordance with the school's safeguarding procedures; and

- a concern about serious wrongdoing affecting children, staff, public funds or the proper operation of the school may constitute whistleblowing.

Where there is uncertainty about which procedure applies, advice should be sought from an appropriate member of the school's leadership team or chair of Governors if related to the leadership team.

4. Who can raise a concern?

This procedure is available to staff and workers working for or with the school, including, where appropriate:

- employees;
- agency workers;
- contractors;
- volunteers;
- governors; and
- other individuals working within or on behalf of the school.

The statutory legal protections for whistleblowing disclosures depend on the individual's employment or worker status. This policy does not remove or restrict any statutory rights.

5. What concerns can be raised?

A concern may be raised under this procedure where the person reasonably believes that information tends to show one or more of the following:

1. that a criminal offence has been committed, is being committed or is likely to be committed;
2. that a person has failed, is failing or is likely to fail to comply with a legal obligation;
3. that a miscarriage of justice has occurred, is occurring or is likely to occur;
4. that the health or safety of an individual has been, is being or is likely to be endangered;
5. that the environment has been, is being or is likely to be damaged; or
6. that information tending to show any of the matters above is being, or is likely to be, deliberately concealed.

Examples may include serious concerns about:

- safeguarding failures;
- abuse or neglect of children;
- serious breaches of health and safety;
- unlawful conduct;
- fraud, theft or financial malpractice;
- serious misuse of school resources;
- deliberate concealment of wrongdoing;

- serious breaches of statutory duties;
- serious professional misconduct; or
- significant failures in systems designed to protect children or staff.

6. Safeguarding concerns

- Safeguarding is everyone's responsibility.
- If a member of staff has a concern about the safety or welfare of a child, they must act without delay and follow the school's Safeguarding and Child Protection Policy.
- Staff should normally report safeguarding concerns to the Designated Safeguarding Lead (DSL) or the Deputy Designated Safeguarding Lead (DDSL).
- DSL: Hayley Francis
- DSL Nursery: Ashleigh Thompson
DDSL: Alison Murray and Katie Steiner
- The school's safeguarding procedures must be followed even where the concern may also amount to whistleblowing.
- If a member of staff has a concern about safeguarding practice and feels unable to raise it internally, they may contact the NSPCC Whistleblowing Advice Line:

Telephone: 0800 028 0285

Email: help@nspcc.org.uk

The NSPCC Whistleblowing Advice Line provides an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or who have concerns about how a concern is being handled. The current service is available Monday to Friday from 8am to 8pm and at weekends from 9am to 6pm.

If a child is in immediate danger, staff should follow the school's emergency safeguarding procedures and contact the emergency services where appropriate.

7. Who should a concern be raised with?

The school will maintain clear internal routes for raising concerns.

Normal route

Concerns should normally be raised with:

Headteacher: Hayley Francis – head@st-josephs.hereford.sch.uk

or, where the concern relates to the Headteacher or it would be inappropriate to raise the matter with them:

Chair of Governors: Lindsay Wise – lwise@st-josephs.hereford.sch.uk

The school will also appoint at least one member of staff who can be approached about whistleblowing concerns:

Staff Whistleblowing Contact: Hayley Francis - head@st-josephs.hereford.sch.uk

Governor Whistleblowing Contact: Lindsay Wise - lwise@st-josephs.hereford.sch.uk

Staff are not required to raise a concern with an individual who is implicated in the concern.

Concerns about the Headteacher

Where the concern relates to the Headteacher, the concern should normally be raised with the Chair of Governors.

Chair of Governors: Lindsay Wise - lwise@st-josephs.hereford.sch.uk

Where the concern involves safeguarding allegations or concerns about the Headteacher, the school's procedures for managing allegations against adults working with children must also be followed.

The school will seek appropriate advice from the local authority's designated safeguarding/allegations arrangements where necessary.

The fact that a concern relates to the Headteacher does not mean that it should automatically be reported to Ofsted. The appropriate route will depend upon the nature of the concern.

8. Role of the Diocese

As a Catholic Voluntary Aided school, the school recognises the important role of the Diocese and its Diocesan Education Service in providing advice, support and oversight to Catholic schools on behalf of the Bishop.

The Diocese provides an important additional route for raising or escalating concerns where the school's internal arrangements are inappropriate, have not resolved the concern, or where the matter has implications for Catholic governance, safeguarding, the school's Catholic character or other matters within the Diocese's remit.

Staff and governors may contact the Diocese where:

- they cannot appropriately raise the concern within the school;
- the concern involves the Headteacher, Chair of Governors or another senior person;
- they believe a concern has not been dealt with appropriately;
- the concern relates to governance of the school;
- the concern relates to the Catholic character or mission of the school;
- the concern relates to compliance with diocesan requirements;
- the concern involves serious safeguarding or welfare failures; or
- they require advice about how a concern should be progressed.

Director of Education: Paul White

Email: paul.white@cardiffmenevia.org

Phone: 07805 566014

Deputy Director of Education: David Thomas

Email: david.thomas@cardiffmenevia.org

General Department Email: r.e.assist@cardiffmenevia.org

The Diocese does not replace statutory safeguarding or regulatory authorities. Where a concern requires immediate action by children's social care, the police, the LADO or another statutory authority, the school will make the appropriate referral without delay.

9. Role of the Local Authority

St Joseph's RC Primary School and Nursery is a maintained Catholic Voluntary Aided school and recognises the role of the Local Authority in relation to maintained schools, safeguarding, education and relevant statutory duties.

The school will maintain appropriate links with the Local Authority and will have regard to the Local Authority's current whistleblowing arrangements when operating this policy.

The Local Authority provides an additional route for raising or escalating concerns where a member of staff reasonably believes that it is inappropriate to raise the concern within the school, or where a concern raised internally has not been dealt with appropriately.

Staff may contact the Local Authority where:

- they are unable to raise the concern with the Headteacher, Chair of Governors or other identified school contact;
- the concern involves the Headteacher, Chair of Governors or another person in a position of authority;
- they believe that a serious concern has not been appropriately addressed by the school;
- the concern relates to serious safeguarding, welfare, health and safety or legal compliance issues;
- the concern relates to financial or other serious malpractice within the school's operation; or
- they require advice about the appropriate route for raising a concern.

Local Authority safeguarding responsibilities

- Where a concern relates to the safety or welfare of a child, the school's safeguarding procedures must be followed without delay.
- Where appropriate, the school will work with the Local Authority's safeguarding services, including the Local Authority Designated Officer (LADO) and/or Multi-Agency Safeguarding Hub (MASH), in accordance with statutory safeguarding requirements and local safeguarding procedures.
- A safeguarding concern must not be delayed while consideration is given to whether it should also be treated as a whistleblowing concern.
- **Local Authority:** Herefordshire Council
- **Whistleblowing contact/team: Monitoring** Officer — the officer with overall responsibility for the Council's Whistleblowing Policy. Concerns can be raised via the confidential whistleblowing inbox. Herefordshire Council
- Telephone: 01432 260000 (Herefordshire Council main switchboard)
- **Email:** whistleblowing@herefordshire.gov.uk
LADO - Phone: 01432 261739
Email: LADO@herefordshire.gov.uk

The school will ensure that the Local Authority contact details are checked as part of the annual review of this policy and whenever the Local Authority changes its whistleblowing arrangements.

10. Concerns about the Chair of Governors or Governing Body

Where a concern relates to the Chair of Governors, or where it would be inappropriate to raise the concern with the Chair, the concern may be raised with:

Vice-Chair of Governors: Angela Spray – aspray@st-jospehs.hereford.sch.uk

Diocesan Education Service:

Where a concern relates to the governing body as a whole, the Diocese may be contacted for advice and appropriate action.

The Diocese may determine whether the matter falls within its governance or canonical remit and whether further action or referral is appropriate.

Nothing in this policy prevents an individual from making a protected disclosure to an appropriate prescribed person or body or from reporting a safeguarding or criminal matter directly to the appropriate statutory authority.

11. Raising a concern outside the school

Staff are encouraged, where appropriate, to raise concerns internally in the first instance. However, there may be circumstances where it is appropriate to raise a concern externally. Individuals should consider obtaining independent advice before making an external disclosure, particularly where they are considering making a disclosure to a prescribed person or body. The current list of prescribed persons and bodies is maintained by the government. Depending on the nature of the concern, relevant external routes may include:

- the local authority;
- the Department for Education;
- the NSPCC;
- Ofsted, where the matter falls within Ofsted's prescribed remit;
- the Health and Safety Executive;
- the Information Commissioner's Office; or
- another appropriate prescribed person or body.

A person should ensure, as far as reasonably possible, that an external disclosure is made to an appropriate prescribed person or body and that the matter falls within that body's remit.

Department for Education

For matters relating to maintained schools, the Secretary of State for Education is included in the current list of prescribed persons.

Department for Education: 0370 000 2288

Ofsted

Ofsted is a prescribed person for matters within its relevant regulatory and inspection remit, including matters relating to children's social care.

Ofsted Whistleblowing Hotline: 0300 123 3155

Email: whistleblowing@ofsted.gov.uk

Ofsted should not be regarded as the automatic reporting route for every concern arising in a maintained school.

12. How to raise a concern

A concern may be raised verbally or in writing.

Where possible, the person raising the concern should provide:

- the nature of the concern;
- the background and reason for the concern;
- relevant dates and events;
- names of individuals involved, where known;
- any supporting evidence or information;
- details of any steps already taken; and
- an indication of whether the concern has previously been raised.

A person does not need to have all the evidence before raising a concern.

Concerns should be raised as soon as reasonably practicable.

The school will not expect an individual to investigate the matter themselves before raising it.

13. Confidentiality and anonymity

The school will treat whistleblowing concerns sensitively and will protect confidentiality as far as reasonably possible.

The identity of the person raising a concern will not normally be disclosed unnecessarily.

However, absolute confidentiality cannot be guaranteed. There may be circumstances where the identity of the person raising a concern needs to be disclosed, for example to comply with legal obligations, safeguard children or enable a fair investigation.

Anonymous concerns will be considered where sufficient information is provided to enable the school to assess and, where appropriate, investigate the concern.

However, anonymity may make it more difficult to investigate the matter, obtain further information or provide feedback.

14. Protection from victimisation or detriment

The school will not tolerate retaliation, victimisation, harassment or detrimental treatment of a person who raises a genuine concern in accordance with this policy.

Workers who make a qualifying protected disclosure are afforded statutory protection under employment law where the relevant legal conditions are met.

A person does not lose protection simply because the concern turns out to be mistaken.

Any alleged victimisation or detrimental treatment arising because an individual has raised a whistleblowing concern will be taken seriously and may be investigated under the school's disciplinary procedures.

15. Malicious or deliberately false allegations

The school encourages people to raise concerns where they have a reasonable belief that wrongdoing may have occurred.

A person who raises a concern that they genuinely believe to be true will not be subject to disciplinary action simply because the concern is subsequently found to be unsubstantiated. However, deliberately making a false allegation, or raising a concern maliciously where the individual knows it to be untrue, may constitute misconduct and may be dealt with under the school's disciplinary procedure.

16. What happens after a concern is raised?

The person receiving the concern will:

- acknowledge receipt where appropriate;
- consider whether the concern falls within this procedure or another school procedure;
- consider whether any immediate safeguarding, health and safety or other protective action is required;

1. consider whether the concern should be referred to another person or organisation;
2. determine an appropriate method of investigation;
3. keep appropriate records of the concern and actions taken; and
4. provide appropriate feedback to the person who raised the concern, subject to confidentiality, legal and safeguarding considerations.

The school may seek advice from the local authority or other appropriate professional or regulatory body.

The person raising the concern will not necessarily be informed of all details of an investigation or any disciplinary action taken because confidentiality and employment law may prevent this.

17. Safeguarding allegations concerning staff and other adults

Any safeguarding concern or allegation about a member of staff, volunteer, contractor, supply worker or other adult working with children must be dealt with under the school's safeguarding procedures and KCSIE requirements.

This includes concerns that may relate to:

- conduct towards a child;
- abuse or neglect;
- inappropriate behaviour;
- failure to follow safeguarding procedures;

- failure to report a safeguarding concern;
- inappropriate relationships or communications with children; or
- other behaviour that may indicate that an individual poses a risk to children.

The school will follow the appropriate local authority procedures, including seeking advice from the Local Authority Designated Officer (LADO) where required.

The whistleblowing procedure does not replace the school's procedures for managing allegations against adults.

18. Concerns about failure to act

Staff are expected to report serious safeguarding, legal, health and safety or other significant concerns.

Where an individual deliberately fails to report a serious matter that they are required to report under the school's procedures, this may be considered under the school's disciplinary procedures. Any action taken will be reasonable and proportionate and will take account of the circumstances.

19. Responsibilities of managers and governors

Anyone receiving a whistleblowing concern must take it seriously.

Managers and governors must not:

- discourage a person from raising a genuine concern;
- retaliate against or victimise a person for raising a concern;
- disclose confidential information unnecessarily;
- ignore or delay consideration of a serious concern; or
- conduct an inappropriate investigation where there is a conflict of interest.

Failure by a manager or governor to deal appropriately with a serious concern may itself be investigated.

20. Record keeping

The school will maintain appropriate records of whistleblowing concerns, actions taken and outcomes.

Records will be:

- stored securely;
 - accessible only to those who need access;
 - handled in accordance with data protection requirements;
 - retained in accordance with the school's records management arrangements; and
 - shared only where there is a lawful and appropriate reason to do so.
- Safeguarding records will be maintained in accordance with the school's safeguarding record-keeping procedures.

21. Training and awareness

- The school will ensure that staff are made aware of:
- this whistleblowing policy;
- how and with whom they can raise concerns;
- the school's safeguarding procedures;
- the identity and role of the DSL and deputy DSL;
- the alternative routes available if they cannot raise a concern internally; and
- protection available to those who raise qualifying concerns.

The policy will be made readily accessible to staff.

New staff will be made aware of the policy as part of induction.

22. Governors' responsibilities

The governing body is responsible for agreeing and establishing the school's whistleblowing procedure.

The governing body will ensure that:

- the school has an effective whistleblowing procedure;
- appropriate contacts are identified;
- staff know how to raise concerns;
- the procedure is consistent with the local authority's arrangements;
- safeguarding and whistleblowing arrangements work together appropriately; and
- the policy is reviewed regularly.

23. Review of this policy

- This policy will be reviewed annually and sooner where necessary.
- An earlier review will take place where there are:
 - changes to legislation;
 - changes to statutory guidance, including Keeping Children Safe in Education;
 - changes to local authority whistleblowing arrangements;
 - changes to safeguarding procedures;
 - significant organisational changes; or
 - learning arising from a whistleblowing concern or other relevant incident.

The governing body will approve any substantive amendments to this policy.

24. Key contacts

Contact	Name / details
Headteacher	Hayley Francis 01989 564655
Designated Safeguarding Lead	Hayley Francis 01989 564655

Contact	Name / details
Nursery Designated Safeguarding Lead	Ashleigh Thompson 01989 564655
Deputy DSL	Alison Murray and Katie Steiner
Staff Whistleblowing Contact	Hayley Francis
Chair of Governors	Lindsay Wise – lwise@st-josephs.hereford.sch.uk
Governor Whistleblowing Contact	Lindsay Wise - lwise@st-josephs.hereford.sch.uk Paul White Email: paul.white@cardiffmenevia.org Phone: 07805 566014
Diocese Whistleblowing Route	
Local Authority Whistleblowing Route	whistleblowing@herefordshire.gov.uk Phone: 01432 261739 Email: LADO@herefordshire.gov.uk
LADO	
NSPCC Whistleblowing Advice Line	0800 028 0285 / help@nspcc.org.uk
Ofsted Whistleblowing	0300 123 3155 / whistleblowing@ofsted.gov.uk
Department for Education	0370 000 2288

25. Related policies and procedures

This policy should be read alongside:

- Safeguarding and Child Protection Policy;
- Staff Code of Conduct;
- Complaints Policy;
- Grievance Procedure;
- Disciplinary Procedure;
- Health and Safety Policy;
- Allegations Against Adults / Managing Allegations Procedure;
- Behaviour Policy;
- Online Safety Policy; and
- Local Authority Whistleblowing Policy and Procedure