

**St Thomas More Catholic Primary school,  
Saffron Walden**



# **WHISTLEBLOWING POLICY**

Policy No. STM-008

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## WHISTLEBLOWING POLICY

### 1. INTRODUCTION

- 1.1. The school is committed to fostering an open and transparent working environment where employees and other stakeholders feel empowered to raise concerns about potential wrongdoing. This policy provides a structured process for reporting suspected fraud, misconduct, malpractice, or other unethical behaviour.
- 1.2. This policy applies to all employees, governors/trustees, volunteers, agency workers, contractors, and any individual engaged in work for or on behalf of the school.
- 1.3. Under the Public Interest Disclosure Act 1998 (PIDA), employees and workers are legally protected when raising concerns about wrongdoing in the public interest. These concerns, known as "qualifying disclosures," include but are not limited to:
  - a) A breach of any legal obligation
  - b) A miscarriage of justice
  - c) A criminal offence
  - d) A danger to health and safety
  - e) Damage to the environment
  - f) Deliberate concealment of information relating to any of the above
- 1.4. Examples of qualifying disclosures within a school context:
  - a) Financial irregularities, including fraudulent use of funds
  - b) Breaches of safeguarding policies or failure to protect children
  - c) Serious health and safety risks
  - d) Ethical misconduct, including discrimination or harassment
- 1.5. Disclosures must be made in the public interest. Personal grievances (e.g., disputes over employment terms) should be raised through the Grievance Procedure.

### 2. Raising Concerns / Making a Disclosure

#### 2.1. Initial Concern

- 2.1.1. Concerns should be raised internally where possible. The recommended process is:
  - a) **Line Manager:** If the concern relates to misconduct within a team.
  - b) **Headteacher or Senior Manager:** If the concern involves a line manager.
  - c) **Chair of Governors/Trustees:** If the concern involves senior leadership.
- 2.1.2. Where an individual feels unable to report internally due to the seriousness or sensitivity of the issue, they may disclose to an external prescribed body, such as:

Type of Disclosure	External Prescribed Body
Fraud / Financial Malpractice	Education & Skills Funding Agency ( <a href="#">ESFA</a> )
Safeguarding / Child Protection	Local Authority Designated Officer or NSPCC (0800 028 0285, <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a> )
Data Protection Issues	Information Commissioner's Office ( <a href="#">ICO</a> )

2.1.3. Verbal concerns should be followed up in writing where possible. Anonymous disclosures will be considered but may limit the ability to investigate fully.

## 2.2. Investigation

2.2.1. Once a disclosure is received, an appropriate individual will be assigned to investigate. The investigation may include:

- a) Obtaining written statements from relevant parties
- b) Reviewing documents and policies
- c) Conducting confidential interviews

2.2.2. A whistle-blower who requests anonymity will be accommodated where possible, though full anonymity cannot be guaranteed in cases requiring formal action.

2.2.3. Whistle-blowers may be accompanied by a trade union representative or work colleague in meetings relating to the investigation.

## 2.3. Outcome of the Investigation

Following the investigation:

- a) Appropriate action will be taken, which may include disciplinary measures, procedural changes, or reporting to an external body.
- b) The whistle-blower will be informed of the outcome where legally appropriate.
- c) Anonymous whistle-blowers will not receive direct feedback unless an anonymous communication method is provided.

## 2.4. Further Action

If the whistle-blower believes their concern has not been appropriately addressed, they may:

- a) Escalate the matter to the Headteacher or Chair of Governors/Trustees
- b) Report the issue to a relevant external prescribed body

## 3. Other Issues

### 3.1. Concerns Raised by Members of the Public

Concerns from external individuals will be handled through the school's Complaints Procedure, unless the issue involves specific misconduct by an employee, in which case the Disciplinary Procedure may apply.

### 3.2. Criminal Issues / Fraud

In cases of fraud or serious misconduct, external authorities (e.g., police, auditors, ESFA) may be informed. The school must report any instance of fraud or financial irregularity exceeding £5,000 to the Secretary of State via the ESFA. Unusual or systematic fraud must be reported

regardless of value. Legal advice may be sought before involving the police.

#### **4. Protecting Whistle-blowers**

##### **4.1. Protection from Detriment**

Whistle-blowers making protected disclosures under this policy are legally protected from dismissal, victimisation, or other detriments.

##### **4.2. Addressing Victimisation**

Any retaliation against a whistle-blower will be treated as a disciplinary matter. Victimisation should be reported to a senior manager promptly.

##### **4.3. Support**

Whistle-blowers may access support through:

- a) Internal wellbeing services
- b) External advisory bodies such as Protect (formerly Public Concern at Work) ([www.protect-advice.org.uk](http://www.protect-advice.org.uk))

#### **5. Malicious Allegations / Disclosures**

##### **5.1. False or Malicious Allegations**

If a disclosure is found to be knowingly false or malicious:

- a) Employees may face disciplinary action under the school's Disciplinary Procedure.
- b) Other workers/contractors may have their engagement with the school terminated.

##### **5.2. Genuine Mistakes**

No action will be taken against whistle-blowers who raise concerns in good faith, even if they are mistaken.

#### **6. Review and Monitoring**

This policy will be reviewed annually to ensure compliance with legislation and best practices.