All Souls' Catholic
PRIMARY SCHOOL

Whistleblowing Policy

2026 - 2027

Review Programme	
Approved by Governors at:	**16th September 2026 (Housekeeping Meeting)**
Date for next review:	**September 2027**
Signed – Chair of Governors *Mrs Shirley Langford*	
Signed – Headteacher *Mr Andrew Cooke*	

Whistleblowing Policy
2026-27

Safeguarding Statement:

'All Souls Catholic Primary School is committed to safeguarding and promoting the safety and welfare of all children and expects all staff, parents, governors and volunteers to share this commitment.'

Our Vision

As a Catholic school that puts Christ at the centre, we live as a community where 'Christ is our Light'.

Values and Ethos

We believe that everyone is made in the image and likeness of God and we value the equality of all, reject discrimination of any kind, and welcome the diversity of different cultures.

1 INTRODUCTION

Whistleblowing has been defined as:

'the disclosure by an employee or professional of confidential information which relates to some danger, fraud or other illegal or unethical conduct connected with the work place, be it of the employee or his/her fellow employees'

(Public Concern at Work Guidelines *1997).*

1.1 All Souls Catholic Primary School takes malpractice seriously and encourages people to speak out if they are aware of any actual or potential malpractice within the organisation. The Governors are committed to creating an open culture, where concerns can be raised as part of a proper professional dialogue without fear of reprisal.

1.2 This policy applies to all school staff including full and part time, casual, temporary, substitute staff and to individuals undertaking work experience in the school. It exists to help individuals raise concerns over any wrongdoing within the school relating to unlawful conduct, financial malpractice, or dangers to the children, staff and parents. It does not apply where employees are aggrieved about their own personal position, normal grievance procedures will apply in these situations. The Policy is primarily for concerns where the interests of others or of the organisation itself are at risk.

1.3 The policy is intended to encourage and enable individuals to raise serious concerns within the school rather than overlook a problem. The policy also outlines how individuals may raise concerns outside the School.

1.4 The policy supports the Council's Fraud and Corruption policy and complements other specific investigation procedures developed to support vulnerable groups i.e. Safeguarding Children and Vulnerable Adult Protection. The policy also compliments other specific procedures and policies developed to support children and enhance the professional conduct and behaviour of all staff.

1.5 If you have any concerns you should contact the headteacher. If this is inappropriate for any reason then :-

1. The Whistleblowing governor, Mrs. Shirely Langford (c/o school).
2. The Archdiocese of Birmingham Diocese Education Service (Tel no: 01675 464 755)
3. For fraud and financial irregularity - the Internal Audit Manager (02476 834035)
4. All other matters – The Council's Monitoring Officer (024 7683 1587)

All staff may use this policy provision. This includes permanent and temporary employees. It also covers agency workers. Contractors working for the school may also use this policy to make the school aware of issues which they perceive would be covered under this policy. This policy applies to all staff working at the school.

1.6 Matters reported directly to the Council by a school based employee will be referred to the Director of CLYP before further action is taken.

1.7 Details of how to raise concerns under this policy are given in section 4.

2 POLICY STATEMENT

2.1 The school is committed to the highest possible standards of openness, probity, and accountability and will take action to address improper practices. As part of this commitment the school is determined to follow the best practice on the exercise of proper professional accountability and:

- provide opportunities for individuals to raise concerns outside of their line management structure;
- not allow individuals who come forward with concerns raised in good faith to be discriminated against or victimised;
- ensure concerns are treated in confidence and make every effort not to reveal the identity of the individual expressing the concern;
- investigate all concerns, ensure individuals get a response to their concerns, and take all possible action against wrongdoers;
- take action against anyone found to have made a false allegation maliciously.

3 WHEN DOES THIS POLICY APPLY

3.1 The Public Interest Disclosure Act 1998 sets out the categories where statutory protection applies. These are:

- a criminal offence;
- a failure to comply with a statutory or legal duty (e.g. Race Relations Act Data protection Act etc.);
- improper unauthorised use of public funds or other funds;
- a miscarriage of justice;
- sexual or physical abuse of any employee or service recipient;
- discrimination of an employee or service recipient on the grounds of sex, age, race, disability, religion, belief or sexual orientation;
- endangering of an individual's health and safety;
- damage to the environment;
- deliberate concealment of any of the above;
- actions that negatively affect the welfare of children

3.2 In addition, the School will provide similar protection to any employee who reports under this policy, breaches in the School's code of conduct.

3.3 The overriding concern should be that it would be in the best interest for malpractice to be corrected and, if appropriate, sanctions applied.

3.4 The policy is subject to any relevant legislation and specifically will operate within the requirements of the Data Protection Act.

4 HOW TO RAISE A CONCERN

4.1 The Public Interest Disclosure Act encourages individuals to raise their concerns with their employer. Within the school the key contacts to raise concerns with are:

Chief Internal Auditor (024 7697 2186), or
City Solicitor and Monitoring Officer (024 7697 6891)

The Local Authority whistleblowing policy can be located here: https://www.coventry.gov.uk/whistleblowingpolicy

In addition, employees can make initial contact with any of the following;
- Head Teacher
- Chair of governors
- Trade Union representative.

Individuals can also contact the officer designated to handle whistleblowing concerns at the Archdiocese of Birmingham:
Email: Gerry.dryden@rc-birmingham.org
Tel: 0121 230 6224

Any of the above will provide advice on how to take the issue forward and will ensure that the relevant key contact is notified that the concern exists. If the concern is connected with the direct line manager then, if appropriate the issue should be taken to the Local Authority.

4.2 Whilst individuals can raise concerns verbally, it is often better to put them in writing, but any method of communication is acceptable. The information needed is:

- the background and history of the concern giving names, dates, places where possible,
- the reason for the particular concern.
- details of any other possible witnesses to the concern
- to allow any points raised to be clarified, individuals will need to provide details of how they can be contacted.

4.3 The earlier concerns are raised; the easier it will be to take action.

4.4 Advice and guidance on how matters of concern may be pursued can be obtained from the following:

- headteacher;
- human resources;
- internal audit services
- trade union/professional association;
- Public Concern at Work. This is an independent Charity that operates a confidential helpline to provide free impartial advice. (020 7404 6609 further details – www.pcaw.co.uk)

4.5 Trade Union representatives may support an employee raising an issue of concern throughout the process.

5 HOW THE SCHOOL WILL RESPOND

5.1 Any concern raised either in writing or verbally will be acknowledged in writing within three working days. This will;

- Acknowledgement that the concern has been received;
- Summarise the details of the concern;
- Identify who is dealing with the matter.

5.2 The action taken will depend on the nature of the concern. The matters raised may be:

- investigated internally by an appropriately skilled experienced employee in the area concerned;
- referred to the police;
- referred to Health and safety Executive;
- referred to the External auditor or Ombudsman;
- referred to the national standards board;
- the subject of an independent enquiry.

5.3 In order to protect individuals and the Council, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what format should take. Concerns or allegations that fall within the scope of specific procedures will normally be referred for consideration under those procedures.

5.4 Some concerns may be resolved by agreed action and no further investigation taken.

5.5 The amount of contact between officers investigating the issues and the employee reporting will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be obtained from the individual reporting the concern in a discreet manner.

5.6 When any meeting is arranged, individuals will have the right to be accompanied by a trade union representative. The meeting can be arranged away from the normal place of work if requested.

5.7 The governors will take steps to minimise any difficulties which individuals may experience as a result of raising a concern and provide any appropriate support. For instance, if the individual is required to give evidence in disciplinary or criminal proceedings, the Council will provide advice about the procedure.

5.8 The school accepts that individuals raising a concern need to be assured that the matter has been properly addressed and will notify them when the policy process has been completed. This will normally be within 20 working days of a concern being raised. In addition, details will be given on what action has been taken to correct working practices, which have been found to be at fault by the investigation.

5.9 If an allegation is received anonymously, it may restrict what the School is to do. There is an expectation that the person reporting a matter will disclose their identity, as this will facilitate the investigation. The School will endeavour to maintain the person's anonymity wherever possible.

5.10 The following factors will be considered when establishing the scope and depth of any investigation:

- the seriousness of the issue raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from recognised sources and information available.

6 SAFEGUARDS

6.1 The School recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the alleged malpractice.

The Governors will not tolerate harassment or victimisation and will take action to protect individuals wherever possible provided that:

- the concerns were raised in good faith;
- the information provided is believed to be true, even if the allegation is not subsequently confirmed by the investigation;
- allegations are not made for personal gain.

6.2 The investigator will carry out a risk assessment to determine safeguards as necessary.

6.3 **Confidentiality** Every effort will be made to ensure confidentiality as far as is reasonably practical. Individuals should be aware that action taken as a result of their report may lead to their identity being revealed, either by inference or as a result of disciplinary or legal proceedings. If this should happen, the Council will not tolerate any individual being victimised in any way.

6.4 **Support** will be provided to help overcome any difficulties experienced as a result of raising a concern. During the investigation, any meetings with the individual raising the concern can be arranged away from their place of work and they will have the opportunity to be accompanied by a representative of their choice, if they wish. If the individual is required to present evidence as a witness, arrangements will be made to provide them with support through the process. Access to counselling and support is available to all employees.

6.5 Every effort will be made to keep the individual reporting the matter of concern informed. However the information provided will be determined by the nature of the investigation and whilst safeguarding the rights of other individuals involved in the process.

6.6 **Anonymity** If an allegation is received anonymously, it may restrict what the Governors are able to do. Employees also have to bear in mind that if they raise a complaint anonymously it may not be possible to provide a response/feedback.

There is an expectation that the person reporting a matter will disclose their identity to the Headteacher or Governors, as this will facilitate the investigation. The School will endeavour to maintain the person's anonymity wherever possible.

Concerns expressed anonymously will be considered at the discretion of the Governors. In exercising this discretion the factors to be taken into account include: -

The school's best interests

The specific nature of the complaint

The seriousness of the issues raised

The credibility of the concern

The likelihood of confirming the allegation from recognised sources and information available.

7 MALICIOUS ALLEGATIONS

7.1 The governors will take action against any individual found to have made a malicious or vexatious allegation. For an employee, this could result in disciplinary proceedings.

8 RAISING CONCERNS OUTSIDE OF THE SCHOOL

8.1 This policy is intended to provide employees with an avenue to raise concerns within the School . If an employee instead takes the matter outside the School, they should ensure that they do not disclose confidential information. Employees should also check that they do not contravene the Public Interest Disclosure Act as this does not provide blanket protection and only allows individuals to disclose matters to their employer or specified bodies. Any breach of the Act could lead to disciplinary action.

8.2 If an individual wishes to raise concerns outside the school or feels that the council has not handled their concerns appropriately, the following contact points may be relevant:

- The ombudsman – 0845 602 1983 (www.lgo.org.uk)
- Relevant professional bodies.
- Trade unions/ Professional associations.
- Your solicitor
- The police

- The Health and Safety Executive.

9 MONITORING

9.1 Monitoring of this policy and procedure will be undertaken by school governors, led by the Chair of Governors.

10 Policy Update Log

24/25 – Update to contact details for local authority staff designated to support whistleblowing concerns (Section 4)

25/26 – No changes

26/27 – No changes

Appendix to Whistleblowing Policy

Guidance Note for Members of Staff

This guidance should be followed if you suspect any conduct or practice in any area of the school's activities which is potentially illegal, corrupt, improper, unsafe or unethical or which amounts to malpractice.

DO

- Make an immediate note of your concerns.
- Note all relevant details such as what was said in telephone or other conversations, the date, time and the names of any parties involved; or any action observed.
- Convey your suspicions to someone with the appropriate authority and experience e.g. your line manager, a member of the senior management team, the headteacher, chair of governors.
- Deal with the matter promptly.
- Keep a copy of all notes/details etc.
- Ask for a copy of your school's whistleblowing policy if this has not routinely been made available to all school staff.

DO NOT

- Do nothing.
- Be afraid of raising your concerns. You must not suffer any recrimination as a result of voicing a reasonably held suspicion. The headteacher and/or chair of governors will treat any matter you raise sensitively and confidentially wherever possible (if you feel that the matter raised is not being treated sensitively and seriously then seek professional or alternative advice)
- Approach or accuse any individuals directly.
- Try to investigate the matter yourself. There are rules surrounding the gathering of evidence for use in criminal cases and in relation to child protection cases. Any attempt to gather evidence by people who are unfamiliar with these rules may destroy the case.
- Convey your suspicions to anyone other than those with the proper authority although other organisations such as a trade union or professional association may help you raise your concerns.
- If you wish to remain anonymous, do not include your name / position or any other information which could lead to your identity being disclosed.

Remember the Public Interest Disclosure Act 1998 protects you from victimisation by dismissal, redundancy or any other detrimental action provided you:

- Have disclosed the information in good faith.
- Believe it to be substantially true.
- Have not acted maliciously or made a false allegation.
- Are not seeking any personal gain.
- It was reasonable for the disclosure to have been made