

**St Monica's Catholic
Primary School**



**Whistleblowing Policy
2026-2028**

Approved by: **Governing Body**

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Created by: **Headteacher**

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Statement of intent

MISSION STATEMENT

“Success for All within a Christ-Centred Community”

St Monica's Catholic Primary School is committed to openness, integrity, accountability and the safety and wellbeing of pupils, staff and the wider community. In keeping with our mission, speaking up about suspected wrongdoing is an act of responsibility and service, not disloyalty.

Concerns raised under this policy will be taken seriously, assessed fairly and handled as confidentially as the circumstances allow. The school will not tolerate victimisation, harassment or any other detrimental treatment of a person because they have raised a concern which they reasonably believe is in the public interest.

This policy explains what whistleblowing is, how concerns can be raised and how the school will respond. It supports the school's safeguarding culture, professional standards, sound governance and proper stewardship of public funds.

Important

A person does not need proof before raising a concern and should not delay an urgent report while trying to gather evidence. They should not investigate the matter themselves or confront the person who is the subject of the concern.

1. Aims and scope

This policy aims to:

- encourage concerns about suspected wrongdoing to be raised promptly and through a safe, accessible route;
- make clear who can receive a disclosure within the school and within Sefton Council;
- set out a fair, consistent and proportionate process for acknowledging, assessing and investigating concerns;
- explain the legal protection that may be available to a worker who makes a protected disclosure;
- protect people who raise concerns from victimisation or other detrimental treatment; and
- ensure that lessons are identified and controls, policies or practice are improved where necessary.

This policy applies to all employees and other workers engaged by the school, including temporary and agency staff, contractors, consultants and student teachers. Volunteers and governors are encouraged to use the reporting routes in this policy, although statutory whistleblowing protection will depend on their legal status and the circumstances of the disclosure.

This policy does not form part of any employee's contract of employment and may be amended when necessary.

2. Legal framework and guidance

The governing body is responsible for agreeing and establishing the school's whistleblowing arrangements. In line with Department for Education guidance for maintained schools, the school identifies at least one member of staff and at least one governor who can receive concerns, informs all staff of the available routes and identifies an external local authority contact.

This policy has been reviewed with regard to:

- Employment Rights Act 1996, Part IVA, as amended by the Public Interest Disclosure Act 1998 and the Employment Rights Act 2025;
- Equality Act 2010;
- Data Protection Act 2018 and the UK General Data Protection Regulation;
- Department for Education: Whistleblowing procedure for maintained schools and the Maintained schools governance guide;

- Department for Business and Trade: Whistleblowing guidance for employers, published 6 April 2026;
- Keeping Children Safe in Education 2025, in force until 31 August 2026, and Keeping Children Safe in Education 2026, in force from 1 September 2026;
- Working Together to Safeguard Children 2026; and
- the current GOV.UK list of prescribed people and bodies.

From 6 April 2026, sexual harassment is expressly included in the statutory categories of wrongdoing that may form the subject of a protected disclosure. Whether a disclosure is legally protected will depend on the statutory tests, including the worker's reasonable belief that the information tends to show wrongdoing and that disclosure is in the public interest.

3. What whistleblowing means

Whistleblowing is the disclosure by a worker of information which they reasonably believe tends to show wrongdoing and which they reasonably believe is in the public interest. The wrongdoing may have occurred in the past, be happening now or be likely to occur in the future.

Examples include, but are not limited to:

- a criminal offence, including fraud, theft, bribery or corruption;
- a failure to comply with a legal, professional or statutory obligation;
- a miscarriage of justice;
- a danger to the health or safety of pupils, staff or others;
- poor or unsafe safeguarding practice, or a failure in the school's safeguarding arrangements;
- sexual harassment;
- serious financial mismanagement, improper procurement or misuse of public funds;
- serious breaches of governance, professional conduct or school procedures;
- damage to the environment; or
- deliberate concealment of information relating to any of the matters above.

What is not usually whistleblowing

A personal complaint about an individual's own employment, such as pay, duties, workload, bullying, discrimination or contractual treatment, will usually be dealt with under the Staff Grievance Policy or another appropriate employment procedure. A complaint by a parent, carer or pupil will usually be dealt with under the school's Complaints Procedure.

A matter may include both a personal grievance and wider public-interest wrongdoing. Where the correct route is unclear, the person should raise the concern promptly and seek advice from the headteacher, chair of governors, their trade union, Acas or Protect. The school will decide the most appropriate procedure and explain that decision.

A non-disclosure agreement, confidentiality clause or similar provision cannot lawfully prevent a worker from making a protected disclosure.

4. Raising a concern

4.1 Immediate safeguarding or emergency concerns

If a child or another person is in immediate danger, call 999. A concern about a child's welfare must be acted upon immediately in accordance with the Safeguarding and Child Protection Policy. Staff should normally report child welfare concerns to the Designated Safeguarding Lead or a deputy.

A safeguarding concern or allegation about an adult working in or on behalf of the school must be reported through the school's allegations or low-level concerns procedure, as appropriate. If the concern is about the headteacher, it must be reported to the chair of governors. Where there is a conflict of interest or the internal route is unsafe, advice should be sought directly from Sefton's Local Authority Designated Officer (LADO).

Sefton CHAT	0151 934 4013 during published opening hours
Emergency Duty Team	0151 934 3555 outside normal hours, including weekends and bank holidays
Sefton LADO	0151 934 3783 safeguardingunitadmin@sefton.gov.uk
Immediate danger or crime in progress	999

4.2 Internal reporting routes

A person should use the most appropriate route and avoid any actual or perceived conflict of interest.

Contact	When to use this route
James Gouldbourne Headteacher	The normal first point of contact for a whistleblowing concern.
Ryan McLoughlin Chair of Governors	Where the concern is about, may involve, or cannot appropriately be raised with the headteacher.
Vice-chair or nominated governor	Where the concern is about or may involve the chair, involves both the headteacher and chair, or another conflict of interest exists.
Sefton Council Chief Legal and Democratic Officer (Monitoring Officer)	Where the person believes an external local authority route is necessary or the school's internal routes are inappropriate or have not addressed the concern.

Sefton Council route: [Sefton Council Whistleblowing Policy](#)

4.3 How to make a disclosure

A concern may be raised verbally or in writing. A written account is preferable where practicable, but a verbal concern will be accepted and the recipient will help the person make an accurate written record. The person may use a personal email address or request a private meeting where this is safer.

The disclosure should include as much of the following as is known:

- the background and history of the concern;
- a clear description of the suspected wrongdoing and why it may affect the public interest;
- the names of people involved and relevant dates, times and locations;
- any documents, information or witnesses that may assist;
- whether the concern has been raised before and what response was received; and
- any personal interest the person has in the matter.

The person is not expected to prove the allegation. They should preserve relevant material, avoid altering or deleting records and must not conduct their own investigation or question potential witnesses.

A person may seek advice or support from a trade union or professional association and may be accompanied at meetings by a trade union representative or workplace colleague who is not involved in the matter and agrees to maintain confidentiality.

4.4 Confidential and anonymous disclosures

The school encourages people to identify themselves because this normally makes it easier to clarify the concern, assess the information, protect the person's position and provide feedback. The school will take reasonable steps to protect the identity of a person who requests confidentiality.

Absolute confidentiality cannot be guaranteed. Disclosure of identity may be necessary to investigate fairly, protect a child or another person, comply with a legal duty, refer the matter to a statutory body or allow the subject of an allegation to respond. Wherever lawful and practicable, the person will be told before their identity is disclosed.

Anonymous disclosures will be considered. The school will take account of the seriousness and credibility of the concern, the available evidence and the possibility of confirming the information from other sources. An anonymous report may limit the investigation and the feedback that can be given.

5. How the school will respond

5.1 Acknowledgement and initial assessment

The recipient of a concern will record the disclosure, acknowledge it promptly and arrange an initial discussion where appropriate. The school will normally provide a written acknowledgement within 10 working days of receiving the concern. Urgent protective or safeguarding action will not wait for this acknowledgement.

The initial assessment will:

- confirm the key information and check that the written record is accurate;
- decide whether the matter falls within this policy or should be managed under safeguarding, low-level concerns, disciplinary, grievance, complaints, capability or another procedure;
- consider immediate action to protect pupils, staff, evidence, public funds or the integrity of an investigation;
- identify a case manager and an impartial investigating person, with conflicts of interest actively managed;
- consider whether specialist HR, legal, safeguarding, audit or regulatory advice is required; and
- decide whether the matter should be referred to Sefton Council, the LADO, police, an auditor, a regulator or another external body.

5.2 Investigation and communication

The acknowledgement will explain, so far as possible, how the matter will be handled, whether further enquiries are planned, who the person can contact, what support is available and the expected next steps. Where an investigation is likely to take more than 20 working days, the case manager will provide reasonable progress updates, subject to confidentiality and legal restrictions.

The investigation will be proportionate to the seriousness and complexity of the concern. It may be carried out by an appropriate senior leader, governor, local authority officer, HR adviser, internal or external auditor, safeguarding professional or independent investigator. A criminal or safeguarding matter may be referred immediately to a statutory agency without the school first completing its own investigation.

The school will consider appropriate wellbeing support for both the person who raised the concern and the person or people who are the subject of it. This support will not compromise the independence of the process or imply that an allegation has been proved.

5.3 Outcome and feedback

At the conclusion of an investigation, the investigating person will prepare a written report setting out the information and evidence considered, findings, conclusions and recommendations. The school will determine any corrective, disciplinary, safeguarding, regulatory, governance or criminal action required.

The person who raised the concern will be told that the process has concluded and will receive as much information about the outcome as confidentiality, data protection, safeguarding and the rights of third parties permit. The school may be unable to disclose details of disciplinary action or confidential personal information.

The school cannot guarantee the outcome sought by the whistleblower. It will, however, aim to handle the concern fairly, promptly and consistently, and will review relevant controls, policies, training or working practices to reduce the risk of recurrence.

6. Protection, support and fair treatment

A worker who makes a protected disclosure has the right not to suffer detriment because of that disclosure and, if they are an employee, not to be unfairly dismissed for making it. Legal protection depends on the statutory conditions and the circumstances of the disclosure.

The school will not tolerate victimisation, harassment, threats, intimidation, exclusion, loss of opportunities, disciplinary action or any other unfavourable treatment because a person raised a concern which they reasonably believed was in the public interest. A person who believes they have suffered detriment should report this immediately to the headteacher, chair of governors or the local authority route, as appropriate.

No action will be taken against a person merely because a concern is mistaken or is not substantiated, provided it was not knowingly false or malicious. Raising a concern persistently does not, by itself, make it malicious.

Support may be available through the person's trade union or professional association, the school's employee assistance or occupational health arrangements, Acas and Protect. The school will also consider reasonable adjustments where required.

7. Deliberately false or malicious allegations

Where there is clear evidence that a person deliberately invented an allegation, knowingly provided false information or acted maliciously, the school may consider action under the relevant disciplinary or conduct procedure. This threshold is high and must not be confused with a concern that is unsubstantiated, mistaken, difficult to investigate or raised in good faith but repeatedly.

8. Escalation and external disclosures

The school encourages internal reporting where it is safe and appropriate because this usually allows concerns to be assessed and addressed quickly. A worker may, however, decide that an external disclosure is necessary, particularly where the matter is exceptionally serious, internal routes are unsafe or inappropriate, or previous concerns have not been addressed.

Different legal tests apply to disclosures made outside the school. Independent advice should be sought before making an external disclosure, particularly before contacting the media or publishing information on social media, where legal protection is available only in limited circumstances.

Route	Contact or purpose
Sefton Council	Chief Legal and Democratic Officer (Monitoring Officer), through Sefton Council's published whistleblowing route.
Protect	Free, confidential and independent whistleblowing advice: 020 3117 2520.
NSPCC Whistleblowing Advice Line	Child protection failures or concerns about how a safeguarding concern is being handled: 0800 028 0285; help@nspcc.org.uk.
Secretary of State for Education	A prescribed person for matters relating to maintained schools in England. Department for Education: 0370 000 2288.
Other prescribed body	Use the current GOV.UK list to identify the body whose legal remit covers the concern, for example the Health and Safety Executive, Information Commissioner's Office, police, external auditor or National Audit Office.

Current prescribed persons list: [GOV.UK – Whistleblowing: list of prescribed people and bodies](https://www.gov.uk/guidance/whistleblowing-list-of-prescribed-people-and-bodies)

9. Record keeping, monitoring and review

The school will keep a secure and appropriately restricted record of each concern, the decisions made, any investigation, the outcome and actions taken. Records will be managed in accordance with the Data Protection Policy, Records Management Policy and the principle that personal data must not be retained for longer than necessary.

Information will be shared only where there is a legitimate need to know, including where safeguarding, regulatory, audit or criminal action is required. Confidential case details will not be recorded in open governing body minutes.

The governing body will receive at least annual anonymised monitoring information, including the number and broad nature of concerns, whether expected timescales were met, outcomes and lessons learned. Monitoring must not compromise confidentiality or identify individuals unnecessarily.

The headteacher will ensure that staff, temporary workers, agency staff, contractors and relevant volunteers are made aware of the policy and reporting routes through induction and periodic reminders. Managers and governors who may receive concerns will be briefed on their responsibilities.

The governing body will review this policy at least every two years and sooner where there is a change in legislation, statutory guidance, Sefton Council procedures, school structure or identified practice.

10. Related policies

This policy should be read alongside the following St Monica's policies and procedures:

- Safeguarding and Child Protection Policy;
- Staff Code of Conduct, including low-level concerns and allegations against staff;
- Disciplinary Policy and Procedure;
- Staff Grievance Policy;
- Complaints Procedure;
- Data Protection Policy;
- Records Management Policy;
- Health and Safety Policy;
- Anti-Fraud, Bribery and Corruption arrangements; and
- Equality information and objectives / relevant equality policies.

Appendix 1: Quick reporting guide

Do not delay

Raise the concern promptly. You do not need proof. Do not investigate it yourself. Call 999 where someone is in immediate danger or a crime is in progress.

Step	Question	Action
1	Is anyone in immediate danger?	Call 999. Follow the Safeguarding and Child Protection Policy without delay.
2	Is this a concern about a child or an adult's conduct towards a child?	Report to the DSL or headteacher as required. If it concerns the headteacher, report to the chair. Contact Sefton LADO where required.
3	Is this suspected public-interest wrongdoing?	Raise it with the headteacher, chair, vice-chair or nominated governor, using the route that avoids any conflict of interest.
4	Are internal routes inappropriate or ineffective?	Use Sefton Council's Monitoring Officer route or seek confidential advice from Protect. For child protection failures, use the NSPCC Whistleblowing Advice Line.
5	What happens next?	The concern will be recorded, assessed and normally acknowledged in writing within 10 working days. Urgent action will be taken immediately where needed.

Key contacts

- Headteacher: James Gouldbourne
- Chair of Governors: Ryan McLoughlin
- Sefton CHAT: 0151 934 4013
- Sefton Emergency Duty Team: 0151 934 3555
- Sefton LADO: 0151 934 3783 | safeguardingunitadmin@sefton.gov.uk
- Protect: 020 3117 2520
- NSPCC Whistleblowing Advice Line: 0800 028 0285 | help@nspcc.org.uk
- Department for Education: 0370 000 2288