



St Joseph's Catholic Primary School Malvern

Whistleblowing Policy

Reviewed September 2025

Review date: September 2026



Whistleblowing Policy

"Following in the footsteps of Jesus, together we love, live and learn"

Confidential Reporting (Whistleblowing) Policy

1. Introduction

This policy is closely based on the LA (Human Resources) policy suggested for C of E (V A) Schools.

People working within organisations are often the first to realise that there may be something seriously wrong in the place where they work. They may be wary of expressing concerns because they feel that it would be disloyal to their colleagues or to their school. They may fear harassment or victimisation. In these circumstances it may feel easier to ignore the concern rather than report a suspicion of malpractice.

This school is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we expect employees and others working at or for the school who have serious concerns about any aspect of the work of the school, Diocese or County Council (described as 'the organisation' hereafter) to come forward and voice those concerns.

Anyone working for or on behalf of the organisation may raise a concern about malpractice.

2. Aims of the Policy

This Policy is designed to encourage and enable you to be able to raise concerns you might have about the way the organisation conducts its business. It provides you with an opportunity to raise concerns which you reasonably believe point to serious malpractice in a confidential way, without fear of victimisation, subsequent discrimination or disadvantage. Your concerns may relate to the improper, unethical or illegal conduct of employees, governors or representatives of the organisation or others acting on their behalf. Some examples of serious malpractice include conduct which:

- is an offence or a failure to comply with a legal obligation;
- allows miscarriages of justice;
- endangers the health and safety of pupils, members of the public or other employees;
- damages the environment;
- involves the unauthorised use of public funds;
- could be possible fraud and corruption;
- involves sexual or physical abuse or harassment of pupils or other workers;
- raises any concern over the welfare of pupils or other workers;



- is deliberate concealment of malpractice.

Victimisation or harassment of anyone using this policy or discouraging others from coming forward will be deemed to be a disciplinary matter.

This policy complements complaints and statutory reporting procedures already in place and reflects the legal protection afforded by the Public Interest Disclosure Act 1998. It is not a substitute for the school's grievance, disciplinary or harassment policies. If you have a personal concern unrelated to malpractice, please use the County Grievance Procedure Policy, copies of which are available from the Headteacher, Education Human Resources or the Diocesan Board of Education.

If, having read this policy, you are uncertain about whether it is the appropriate policy or how to proceed, please seek informal advice from Education Human Resources or from the Diocesan Board.

3. Who is responsible for the Policy?

The governing body is responsible for the operation of this policy in matters relating to this school. The governing body will work in partnership with the Local Authority and the Diocesan Board.

The County Council Chief Executive and the Monitoring Officer (the Director of Corporate Services) have overall responsibility for the maintenance and operation of this policy throughout the County Council. Their role is to ensure that matters are investigated properly and to maintain a record of concerns raised together with outcomes and they will report as necessary to the County Council without jeopardising confidentiality.

4. Raising Concerns

Step 1 – Raising a concern within the school

If you have a concern about malpractice, the Governing Body hopes that you will be able to raise the matter with the Headteacher. If your concern is connected to a child protection issue, you must follow the school's Child Protection Policy.

However, if you feel unable to raise the concern with your Headteacher, you should speak to the Chair of Governors or another governor. Alternatively, you may contact an officer of the Diocese or the Local Authority (either Education Human Resources or the school's contact inspector).

Concerns may be raised verbally and/or in writing. If you wish to make a written report, include in your letter the background and history (giving relevant dates) and give the reason why you are particularly concerned about the matter. You may also wish to seek advice from your trade union at this stage.

If you are personally involved in the matter you raise, please tell us at the outset.

You may invite your trade union, a member of staff from Human Resources or a work colleague to be present during any meetings or interviews (which may be arranged



away from your normal workplace if you so wish) in connection with the concerns you have raised.

Step 2- Raising a concern within the County Council

Where appropriate, the Executive Headteacher, Head of School, governor or LA/Diocesan officer will refer the matter to another County Council officer. For example, concerns about any financial irregularity, would be raised with the Internal Auditor; concern about a Councillor, may be raised with the Chairman of the County Council Standards and Ethics Committee.

If you have followed the channels in Step 1 and still have concerns or if you feel unable to discuss the matter with any of the individuals listed in Step 1, you may wish to raise the matter with the Director of Educational Services. Alternatively, you may contact either the Monitoring Officer, or one of the Deputy Monitoring Officers (the Head of Member and Administrative Services or Head of Legal Services) or a County Councillor. If the concern is related to child protection, you may raise it with the Education Child Protection Officer (the Pupil and Parent Support Manager).

What will happen?

The person you approach will respond promptly to your concerns by assessing what action is to be taken. This may involve an internal investigation or a more formal inquiry. You will be told who else is to be informed and who is handling the matter (the Responsible Officer), how you can contact them and whether any more assistance from you will be required. Normally, within 7 working days of a concern being raised, the Responsible Officer will write to you acknowledging that your concern has been received. The letter will inform you of any relevant staff support mechanisms and arrangements for keeping you informed.

Some concerns may be resolved by agreed action without the need for an investigation. If urgent action is required this may be taken before any investigation is conducted.

Thereafter, the Responsible Officer will keep you informed of progress and the outcome of any investigations or decisions on the matter including the content of any reports written.

The organisation will seek to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, the Council will arrange for you to receive appropriate advice. You will be protected against victimisation as a result of raising a concern and, proven victimisation will be dealt with under disciplinary procedures. In exceptional circumstances, it may also be necessary to consider future working arrangements.

Step 3 - Raising a Concern Externally

We hope this policy gives you the confidence to raise your concern within the organisation. However, we would prefer you to raise your concern with the proper external regulator rather than remain silent.



If you act in good faith reasonably believing that both the malpractice falls within the remit of a regulator **and** that the information disclosed is substantially true, you may also contact the following:

- the Health and Safety Executive for health and safety dangers;
- the Environment Agency for environmental dangers;
- the Audit Commission or External Auditor for concerns about conduct of business, value for money, fraud and corruption;
- the Data Protection Registrar.

Finally, if you genuinely believe that the matter cannot or will not be dealt with internally because you believe your complaints have been ignored, or that information will be concealed or destroyed or you will be subjected to victimisation and have evidence to back up your belief, you may consider contacting a non-regulatory external body for example the police, OFSTED, the Department for Education and Skills or The National Society (C.E). You are strongly advised to seek independent advice before raising any issue outside the County Council or Diocese. Possible contacts are given below.

5. Confidentiality

The organisation undertakes to protect your identity and will not disclose it without your consent. If it is not possible to pursue your concern without revealing your identity (e.g. the need to give evidence in court or at a disciplinary hearing), we will discuss with you how and if we can proceed.

6. Untrue Allegations

If you make an allegation in good faith, but the evidence produced during the investigation does not substantiate it, no action will be taken against you. If, however, you make an allegation maliciously or for personal gain, this may result in disciplinary action being taken against you.

7. The Role of the Trade Unions and Further Advice

The trade unions recognised by the County Council are committed to the effective use of this policy. If you are considering raising concerns using this procedure you may wish to seek advice from your trade union representative before doing so, particularly if you believe that the only course of action open to you is to raise your concern with an external body.

You may of course seek advice from any Officer of the County Council and, in particular, from Education Human Resources at County Hall on 01905 763763 or from the Diocesan Board of Education for the Diocese of Worcester on 01905 732825.

If you want other independent advice at any time you may contact the independent charity, Public Concern at Work on 0207 404 6609 or email them on whistle@pcaw.demon.co.uk. Their lawyers will give you free confidential advice on how to raise a concern about serious malpractice at work