

Sarum St Paul's Church of England (VA) Primary School



Whistleblowing Policy

Policy Written:	August 2026
Policy Ratified:	28 th September 2026
Policy Reviewed:	
Next Review Date:	August 2027 (or earlier if legislation, statutory guidance or local authority arrangements change)

Key Personnel:

Role	Name
Headteacher	Mrs Hannah Easthope
Chair of Governors	Caroline Chitty
Whistleblowing Governor	Gina Hepburn

Our Vision

Rooted in Love, Growing Together

At Sarum St Paul's Church of England Primary School, our vision of "**Rooted in Love, Growing Together**", inspired by St Paul's prayer to the Christians in Ephesus (Ephesians 3:17-18), shapes every aspect of school life. Rooted and grounded in love, we seek to ensure that all members of our community are able to grow and flourish. Our values of **Love, Community, Courage and Growth** guide our relationships, inform our decision-making and underpin the policies and practices through which we serve our whole school community.

Introduction

1. All schools and academy trusts are required to have appropriate procedures in place for handling whistleblowing and for ensuring school staff and volunteers know who they can contact if they wish to raise a concern.
2. This document explains the types of concerns that can be raised under this procedure, the legal protection for whistleblowers and how whistleblowing concerns will be handled.
3. This procedure should be followed for whistleblowing matters raised by employees of the school, volunteers, supply staff and agency workers.
4. The term 'headteacher' is used throughout this procedure. Depending on the nature of the concern, aspects of the procedure may be delegated to an appropriate member of the senior leadership team, school business manager or line manager. Where the concern is about the Headteacher, it must be raised with and managed by the Chair of Governors, Caroline Chitty.

Policy Statement

5. Wiltshire Council and the school are committed to the highest possible standards of:
 - openness and inclusiveness
 - accountability
 - integrity.

What is Whistleblowing?

6. Whistleblowing is when a worker raises a concern about wrongdoing, poor or unsafe practice, misconduct or potential failures in the school's systems and processes.
7. To qualify as a protected disclosure under whistleblowing law, the worker must reasonably believe that the disclosure is in the public interest and tends to show relevant wrongdoing.
8. The wrongdoing may relate to one or more of the following:
 - a criminal offence
 - a failure to comply with a legal obligation
 - a miscarriage of justice
 - a danger to the health or safety of any individual
 - damage to the environment
 - misuse of public money, fraud, corruption or other unethical conduct
 - failing to safeguard and promote the welfare of children
 - sexual harassment
 - deliberate concealment of information relating to any of these matters
9. The concern may relate to something that happened in the past, is happening now or is likely to happen in the future.
10. Concerns about an employee's own employment situation, such as working conditions, employment rights or interpersonal difficulties, should normally be raised through the school's Grievance Procedure unless the concern also meets the public-interest test for whistleblowing.

Aim of procedure

11. Encourage those working and volunteering in the school to report suspected wrongdoing promptly, in the knowledge that concerns will be taken seriously and considered appropriately.
12. Provide clear guidance on how to raise concerns.
13. Reassure staff that they can raise genuine concerns which they reasonably believe are in the public interest without fear of reprisal, even if the concern later turns out to be mistaken.
14. Ensure clear internal and external routes are available for raising whistleblowing concerns.

Legal protection for whistleblowers

15. Workers who make a qualifying protected disclosure are protected by the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998 and subsequent legislation. Protection can apply to appropriate disclosures made internally or through other legally recognised routes.
16. The school will not tolerate harassment, victimisation or any other detriment because a person has raised a genuine whistleblowing concern. Appropriate action, including disciplinary action where relevant, may be taken against anyone responsible for such treatment.
17. A worker does not have to prove that wrongdoing has occurred before raising a concern. They should have a reasonable belief that the information disclosed tends to show wrongdoing and, for a qualifying disclosure, that raising it is in the public interest.
18. Any confidentiality or non-disclosure provision does not prevent a worker from making a protected disclosure where the law permits it.

False and malicious allegations

19. The school will protect itself and its employees from allegations that are knowingly false or malicious. Where there is evidence that a person has deliberately made a false allegation, disciplinary action may be considered. No action will be taken simply because a genuine concern raised in accordance with this procedure is not substantiated.

Procedure for raising a whistleblowing concern

Whistleblowing anonymously or confidentially

20. Concerns may be raised anonymously. However, it may be more difficult to investigate or provide feedback if the person raising the concern cannot be contacted.
21. A whistleblower may give their name but request confidentiality. Every reasonable effort will be made to protect their identity, subject to the requirements of a fair investigation, safeguarding duties and the law.
22. Where disclosure of the whistleblower's identity becomes necessary, the school will discuss this with them as early as reasonably practicable.
23. All disclosures made under this procedure will be treated sensitively, consistently and fairly.

Step 1 - Reporting the concern

24. Concerns can be raised verbally or in writing.

25. Whistleblowing concerns may be raised with the Headteacher, Deputy Headteacher or the school's named Whistleblowing Governor. The Whistleblowing Governor is available as a route for any whistleblowing concern and is not limited to concerns about a particular person.

26. The school's internal whistleblowing contacts are:

- Hannah Easthope, Headteacher
- Annie Martindale, Deputy Headteacher
- Gina Hepburn, Whistleblowing Governor

27. If the concern is about the Headteacher, it must be raised directly with the Chair of Governors, Caroline Chitty. The Headteacher should not be involved in receiving, considering or investigating a whistleblowing concern about themselves.

28. Where a staff member or volunteer feels unable to raise an issue internally, or believes that their genuine concern is not being addressed, other whistleblowing routes are available. These include appropriate contacts at Wiltshire Council and prescribed persons or bodies relevant to the subject of the concern.

29. For child protection or safeguarding failures, staff who do not feel able to raise concerns internally, or who are concerned about the way a concern is being handled, may contact the NSPCC Whistleblowing Advice Line on 0800 028 0285 or help@nspcc.org.uk.

30. Staff should take care before making a wider disclosure, for example to the media, because the statutory conditions for legal protection are more demanding. Independent advice should be sought where appropriate.

31. You are not expected to prove the truth of your concern. You should explain the information you have and the reasons for your concern as clearly as possible.

32. You may seek advice from your trade union, Citizens Advice or the independent whistleblowing charity Protect.

33. You may be accompanied by a trade union representative or workplace colleague at meetings held under this procedure.

Step 2

34. The person receiving the concern will decide what initial action is needed and may ask for further information. They will normally write to the whistleblower within 10 working days to explain how the concern will be dealt with.

35. The response should, where appropriate, include:

- an indication of how the concern will be dealt with
- an estimate of how long it may take to provide a final response
- whether initial enquiries have been made
- whether further investigation will take place and, if not, why
- information about support available.

36. The person receiving the concern should obtain appropriate HR, legal, safeguarding, financial or other specialist advice according to the nature of the concern. Information should only be shared with those who have a legitimate need to know.

Step 3

37. Initial enquiries will be made to decide whether an investigation is appropriate and, if so, who should conduct it.

38. An investigation may be carried out depending on the nature of the allegation and the information available. Full details may need to be withheld from the whistleblower to protect confidentiality, safeguarding or the rights of others.

39. Information may need to be shared with people who have a legitimate need to know. The whistleblower may be asked to provide a written statement or act as a witness in subsequent proceedings. This will be discussed with them.

40. Where an investigation is necessary, it may include one or more of the following:

- an internal investigation by an appropriate senior leader or governor
- a disciplinary investigation
- an investigation by Internal Audit or another appropriate specialist service
- a referral to the police, local authority, safeguarding partners or another statutory body
- an external independent investigation or inquiry.

Step 4

41. The whistleblower will be informed of the outcome of any investigation and/or action taken as far as is reasonably possible, subject to confidentiality, data protection, safeguarding considerations and the law.

42. If the whistleblower does not believe their concern has been addressed adequately, they may consider raising it with an appropriate external body, including Wiltshire Council or a prescribed person or body relevant to the concern.

43. A disclosure made to a prescribed person or body may be legally protected where the statutory conditions are met. Different and more demanding conditions apply to some wider disclosures.

44. The duty of confidentiality owed to the school does not prevent a worker from making a protected disclosure or seeking independent advice. Protect provides free, confidential whistleblowing advice.

Safeguarding concerns

45. Whistleblowing is an important part of the school's safeguarding culture. In line with Keeping Children Safe in Education 2026, all staff should feel able to raise concerns about poor or unsafe safeguarding practice and potential failures in the school's safeguarding arrangements. Where a member of staff feels unable to raise such concerns internally, or feels that concerns are not being addressed, appropriate external whistleblowing channels are available.

Review and Reporting of the Procedure

46. As a voluntary aided school, responsibility for agreeing and establishing the school's whistleblowing procedure rests with the Governing Body.

47. The Governing Body will ensure that at least one member of staff and at least one governor are identified as people whom staff can contact to report whistleblowing concerns. At Sarum St Paul's, Gina Hepburn is the named Whistleblowing Governor.

48. The school will ensure that all staff, including temporary staff and contractors, know the whistleblowing arrangements and the internal and external routes available to them.

49. This procedure will be reviewed annually and earlier where there are relevant changes to legislation, statutory guidance, local authority arrangements or school responsibilities.

Annex 1 - Wiltshire Council and local authority routes

Where a member of staff feels unable to raise a concern within school, or believes that a concern has not been addressed, they may use an appropriate Wiltshire Council route. Current contact details should be checked against Wiltshire Council's published school support, safeguarding, HR, finance and health and safety information at the time the concern is raised.

Annex 2 - External bodies and organisations

A worker may make a disclosure to an appropriate prescribed person or body where the legal conditions are met. The current statutory list of prescribed people and bodies is published by the government and should be checked before making an external disclosure.

- Ofsted - for matters within Ofsted's prescribed remit
- Ofqual - for matters relating to qualifications and examinations within its remit
- Health and Safety Executive - for relevant health and safety matters
- Information Commissioner - for relevant data protection and freedom of information matters
- Equality and Human Rights Commission - for matters within its prescribed remit
- NSPCC Whistleblowing Advice Line - 0800 028 0285 / help@nspcc.org.uk for child protection concerns in the workplace
- Protect - independent, confidential whistleblowing advice