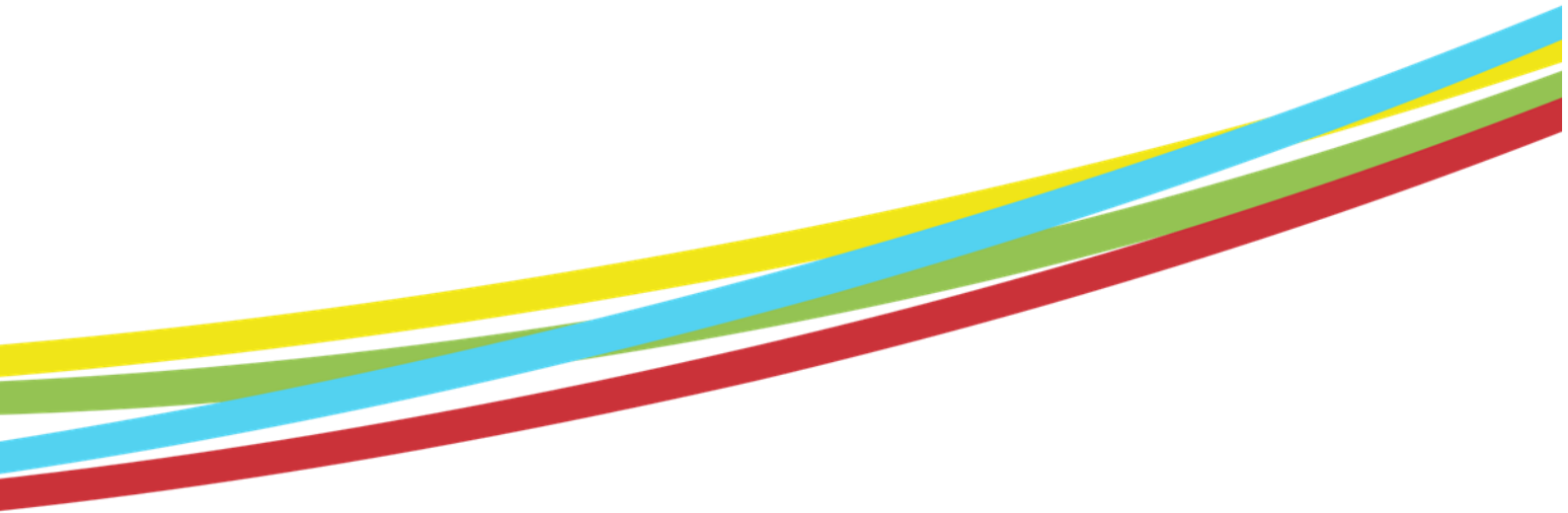




**St Joan of Arc School**  
Growing together



**Policy**

# **Whistleblowing Low-Level Concerns**

**2025-26**

# Mission Statement

The Members of the Community of St Joan of Arc School, by respecting each other, learn and grow in the love of Christ.

1. Purpose
2. Application of the policy
3. Key principles
4. The Whistleblowing Procedure
  - 4.1 Stage 1: Reporting concerns
  - 4.2 Stage 2: Investigation
  - 4.3 Stage 3: Conclusion of the investigation and subsequent actions
5. Confidentiality
6. Anonymous allegations
7. Untrue allegations
8. Dissatisfaction

Appendix A: Sources of advice and support

Appendix B: Allegations against staff and referrals to the LADO

Appendix C: Reporting low level concerns

## 1. Purpose

- 1.1 The policy is designed to enable all employees to notify the Headteacher, Chair of Governors and the Council Whistle Blowing Officer (CWBO) of any reasonable suspicion of illegal or improper conduct that is made in the public interest and which would not normally be revealed due to fears of victimisation or retribution. This policy sets out the way in which individuals may raise a protected disclosure and how those disclosures will be dealt with.
- 1.2 This policy has been devised in accordance with the provisions of the Public Interest Disclosure Act 1998 and the Enterprise and Regulatory Reform Act 2013 which offer protection to employees who “blow the whistle” on their employer by making a qualifying disclosure. A disclosure is not protected unless the employee reasonably believes that the disclosure is made in the public interest.
- 1.3 The policy aims to:
  - encourage employees to feel confident in raising serious concerns and to question and act upon concerns of malpractice
  - provide avenues to raise those concerns and receive feedback on any action taken
  - ensure that employees receive a response to their concerns and are aware of how to pursue them if they are not satisfied
  - reassure employees that they will be protected from possible reprisals or victimisation if the disclosure is a qualifying disclosure

## 2. Application of the policy

- 2.1 The policy can be used by any person who works or has worked for the school. There is a separate procedure for pupils and parents to raise concerns about school related issues.
- 2.2 Whistleblowing occurs when a concern is raised about danger or illegality that affects others. The person ‘blowing the whistle’ will not necessarily be directly affected by the danger or illegality. Consequently the whistle blower is not likely to have a personal interest in the outcome of any investigation into the concern(s). This is different from a complaint or grievance where the complainant is alleging that they have been personally poorly or unfairly treated.
- 2.3 The policy is not intended to cover matters that concern day to day issues relating to an employee’s terms and conditions of employment or a complaint about another employee which can usually be referred to their line manager and/or trade union representative, or if necessary be pursued using the School’s Grievance Procedure.
- 2.4 In order for a disclosure to be protected under the policy, it must be made in the public interest.
- 2.5 Any concerns that employees have about any aspect of service provision or the conduct of employees, governors or others acting on behalf of the school can be reported under the Whistleblowing Policy and must relate to:
  - a criminal offence
  - a failure to comply with a legal obligation
  - a miscarriage of justice
  - a danger to the health and safety of an individual
  - damage to the environment
  - a failure to comply with the school’s policies and procedures
  - a significant breach of child protection and/or safeguarding policy and procedures
  - any conduct which may damage the school’s reputation
  - a deliberate attempt to conceal any of the above

- 2.6 In practice, as well as relating to the points outlined in 2.5, the disclosure could be about:
- something that makes them feel uncomfortable in terms of known standards, their experience or the standards they believe the school or Islington Council subscribes to
  - something that is against the school's or Islington Council's procedures, rules and policies
  - something that falls below established standards of practice
  - something that amounts to improper conduct
  - the unauthorised use of public funds
  - fraud and corruption
  - a significant breach of child protection and/or safeguarding policy and procedures
  - homophobic, racial, religious, sexual, or physical abuse of children, staff, governors or other users
  - conduct which is an offence or a breach of the law
  - disclosures related to actual or potential miscarriages of justice
  - health and safety risks, including risks to the public as well as other employees
  - other unethical conduct
- 2.7 Other parties may have a role within the policy including: Islington Council's Whistle Blowing Officer (CWBO), the Local Authority Designated Officer (LADO) for concerns relating to child protection, the Health and Safety Manager as well as outside organisations such as Public Concern at Work and Diocesan Officers. Specific roles and responsibilities are outlined in Appendix A.

### 3. Key principles

- 3.1 The policy is designed to support the governors' and senior leaders' commitment to the highest possible standards of conduct, openness, honesty and accountability. In line with that commitment it is expected that staff will report any serious concerns they might have about any aspect of the school's work or colleagues.
- 3.2 All staff have a professional duty to pass on any concerns involving the safeguarding or protection of children to someone who can deal with it. This will include concerns about fellow professionals, or anyone who works with or comes into contact with, children. These have to be dealt with in accordance with local child protection procedures.
- 3.3 A key commitment is that staff will be able to express their concerns without fear of being victimised or penalised in any way. The policy aims to encourage and enable staff to raise concerns internally, rather than ignoring the problem or taking it outside the organisation.
- 3.4 A whistle blower will not be victimised for raising a matter under this procedure. Victimisation of a whistle blower for raising a qualified disclosure will be a disciplinary offence.

### 4. The Whistleblowing Procedure

#### 4.1 Stage 1: Reporting concerns

- 4.1.1 Concerns should be raised with the Headteacher, Deputy Headteacher or line manager as soon as any suspected malpractice becomes apparent. As the whistle blower would normally be a witness to events, and not a complainant, they do not need to wait for proof of malpractice before raising concerns.

- 4.1.2 If the whistle blower feels that they cannot raise the matter with their line manager (for example, it is suspected that that person already knows about the malpractice, or appears to be ignoring it or where it is suspected that they may be involved), then the whistle blower will need to consider which of the following people may be the most appropriate:
- the Deputy Headteacher (Hugh Heneghan)
  - the Headteacher (Clare Campbell)
  - the Chair of Governors ( **Rebecca Eaves** – e mail addresses available through the school's internal email address book)
  - the Council's Whistle Blowing Office, CWBO (see Appendix A)
- 4.1.3 All those receiving whistle blower reports must inform the Council's Whistle Blowing Officer **within 24 hours**. The Council's Whistle Blowing Officer will inform the Director of Schools and Young People's Services, Head of Schools HR and Diocesan Officers as appropriate.
- 4.1.4 When reporting a concern the whistle blower should provide as much information and detail as possible. In particular you should provide the full names of the people involved, including the names of staff or contractors, dates of events and any relevant documentation.
- 4.1.5 Initial enquiries will be made by the line manager **within 3 days** to determine whether the concern falls within the scope of the policy and if so, whether an investigation is appropriate; the whistle blower will be kept informed of progress and action being taken. When making a decision the line manager will consider whether continuing with an investigation is in the public interest.
- 4.1.6 The person who receives the line manager's recommendations (Headteacher or Responsible Officer) must ensure that it is acted on fully unless there is a good reason for not doing so. If there is a good reason for not acting on the recommendation, these must be reported to the next meeting of the Governing Body.

## 4.2 Investigation

- 4.2.1 If it is determined that an investigation is to be undertaken the next steps will include:
- an interview with the whistle blower **within 10 working days** of the initial concern being raised. The whistle blower can be accompanied at the interview by a trade union representative or a work place colleague
  - if the initial concerns were made verbally, then the whistle blower will be asked to provide a written statement
  - the whistle blower will receive a written acknowledgement of the report and be informed of the action being taken to investigate the concern
  - the whistle blower where possible will be kept informed of the progress and likely timescales of the investigation unless the investigating officer believes that there is a risk of the investigation being prejudiced
  - in some circumstances the matter will be referred to an outside agency such as the police

## 4.3 Stage 3: Conclusion of the investigation and subsequent actions

- 4.3.1 If the allegation is not proven or there is insufficient evidence on which to base a conclusion, the whistle blower will be advised accordingly.
- 4.3.2 In cases where action is necessary as a result of the allegation, a report will usually be sent to the Headteacher or the Chair of Governors, who will be responsible for implementing the recommendations in the report. The whistle blower will be advised when the investigation is complete but it may not always be possible to provide the details of the findings as this may be confidential.

- 4.3.3 If the investigation concerns inappropriate action by the Headteacher or Governors, the report will be sent direct to the Council's Whistle Blowing Officer, the Director of Schools and Young People's Services and to the Diocesan Officers.

## Other points to note

### 5. Confidentiality

- 5.1 All concerns will be treated in confidence and every effort will be made not to reveal the identity of the whistle blower. However, in order to investigate the matter properly it is impossible to guarantee complete confidentiality.
- 5.2 Some cases are clearly so serious that police may have to be involved. In these cases it may be necessary to reveal the identity of individuals.
- 5.3 While these procedures are being carried out, all parties will need to agree that the issue will be kept confidential. The whistle blower's identity will be kept confidential unless they are happy to be named, or unless there are grounds to believe that they have acted maliciously. If there are no such grounds, the manager will only reveal the identity if:
- they have to do so by law
  - the information is already known
  - it is revealed in confidence to a qualified lawyer in order to get legal advice
  - the whistle blower has to provide evidence at a disciplinary hearing or other proceedings

### 6. Anonymous allegations

- 6.1 Whistle blowers are encouraged to give their name when raising concerns. From a practical perspective, anonymous allegations are likely to be more difficult to investigate, and protection against reprisals and feedback can be afforded only to identifiable individuals.
- 6.2 Whilst it is accepted that anonymous allegations do not carry the same weight, any such reports received by the school will be considered at its discretion. In exercising this discretion account will be taken of the seriousness, credibility of the matters raised and the likelihood of confirming the allegation from the sources quoted. The decision whether to investigate an anonymous allegation will be made by the Headteacher and/or the Chair of Governors and/or the Council's Whistle Blowing Officer.

### 7. Untrue allegations

- 7.1 If the allegation was considered to be made frivolously, maliciously or for personal gain, disciplinary action may be taken against the individual.

### 8. Dissatisfaction

- 8.1 If any member of staff is unhappy with the response, they can take the matter to a higher level or one of the organisations listed in the policy.

## Appendix A: Sources of advice and support

Staff can receive advice from a relevant professional in the school and Islington Council before making a report under this procedure. For Islington Council this will include:

- Islington Council's Whistle Blowing Officer CWBO (07979 834012)
- Local Authority Designated Officer LADO (020 7527 8102)
- Health & Safety Manager (020 7527 5971)
- Head of School's Human Resources (020 7527 5677)
- Diocesan Officers (020 7932 1100)

Employees who suspect fraud, corruption or other financial irregularities should ensure this is reported to the CWBO for possible investigation. Normally, the employee would first report any suspicion of such irregularity to their Headteacher who will in turn report it to the CWBO. In most cases this will be done through the line management structure. Exceptionally, if employees believe the matter cannot be resolved in this way, they should report it direct to the CWBO.

Employees who have concerns which relate to Child Protection should ensure this is reported to the LADO for possible investigation. Normally, the employee would first report any suspicion of such irregularity to their Headteacher who will in turn report it to the LADO. In most cases this will be done through the line management structure. Exceptionally, if employees believe the matter cannot be resolved in this way, they should report it direct to the LADO.

The following organisations outside the school can also be contacted:

- Audit Commission Public interest Disclosure Act Hotline. Tel: 020 7630 1019
- Public Concern at Work. Tel: 020 7404 6609 or visit their website <http://www.pcaw.co.uk>

For a full list of bodies and people who you can make a disclosure to see:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies>

Alternatively, you may wish to ask for confidential help from your trade union

## Appendix B : Referrals to the Local Authority Designated Officer

### Allegations Against Members of Staff and Volunteers

St Joan of Arc recognises that it is possible for staff, supply staff and volunteers to pose a risk of harm to children by behaving in a way that might cause them harm. We will take seriously any allegation received and follow the guidance in Part 4, **KCSIE 2023**.

### Referrals to the Local Authority Designated Officer (LADO)

A referral to the Local Authority Designated Officer (LADO) should be made immediately if a member of staff, volunteer or supply staff has:

behaved in a way that has harmed a child, or may have harmed a child;  
possibly committed a criminal offence against or related to a child;  
behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or  
behaved or may have behaved in a way that indicates they may not be suitable to work with children (eg where they are involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children (one example being domestic abuse.)

In the event that there are concerns regarding any one or more of the above criteria the following will take place:

Basic enquiries to establish facts before contacting LADO

A case manager (usually headteacher) to lead investigation

The case manager to discuss any concerns about the welfare of other children in the community and of the member of staff's family with the DSL and make risk assessment

DSL may then make a referral to children's social care

Where a member of staff has acted in a way outside of school that may question their suitability to work with children (transferable risk), a risk assessment should be carried out when appropriate  
If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff and volunteers) posing a risk of harm to children, then:

- o this should be immediately referred to the headteacher;
- o where there are concerns/allegations about the headteacher, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school; and in the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent school, this should be reported directly to the LADO.

Where there is an allegation against an agency or supply member of staff, the school or college will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the governing body or proprietor when working in the school or college. They will be advised to contact their trade union representative if they have one, or a colleague for support.

## Appendix C :low Level Concerns

Low-level concerns (including allegations) are those that do not meet the harm threshold set out above. Concerns may arise from suspicions, complaints, a disclosure made by a child, parent or other adult or member of the public or as a result of vetting checks undertaken. **St Joan of Arc School** will manage and record such concerns and take appropriate action to safeguard children.

Supply agencies or contractors will be made aware of the process and contacted if necessary

St Joan of Arc School, as part of our whole school approach to safeguarding, promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. We believe it is critical to create a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one KCSIE 2022) are shared responsibly and with the right person, recorded and dealt with appropriately. This is to ensure that problematic or inappropriate behaviour is identified early, the risk of abuse is minimised and that all adults working in the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school.

A low-level concern means that the behaviour towards a child does not meet the harms threshold and a referral to the LADO. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

**St Joan of Arc School** believes it is crucial that any such concerns, including those which do not meet the allegation/harm threshold are shared responsibly and confidentially with the right person, and recorded and dealt with appropriately. This will also protect staff from potential false allegations or misunderstandings.

### What to do If you have a low Level Concern

Low-level concerns about a member of staff should be reported to the **headteacher**

The school encourages staff to feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Where a low-level concern relates to a person employed by a supply agency or a contractor, that concern should be shared with the DSL and/or headteacher, and recorded in accordance with the school's staff code of conduct policy (as per paras 423-441 KCSIE 2023) and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or Schools Human Resources Service.

### Reporting low Level Concerns

All low-level concerns should be recorded in writing by the DSL. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will either implement disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, it will be referred to the LADO.

Consideration will also be given to whether there are wider cultural issues within the school that have enabled the behaviour to occur and where appropriate policies will be reviewed and updated or extra training delivered to minimise the risk of it happening again. The records will be retained at least until the individual leaves the employment of the school, unless there is an ongoing investigation taking place.

All staff and volunteers are made aware of the school's Whistle-blowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. Staff and volunteers can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally on 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

St Joan of Arc has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or Schools Human Resources Service.

**This Policy is reviewed annually  
or earlier if necessary by:**

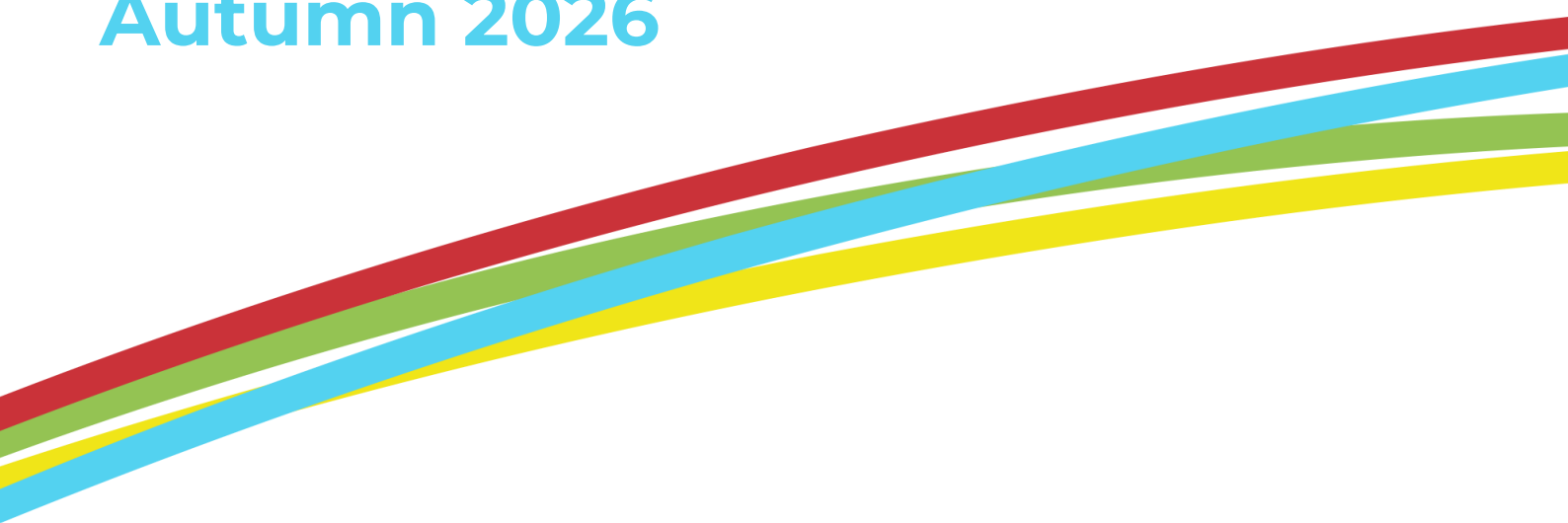
# **The Finance, Personnel & Buildings Committee**

**It was last reviewed in**

## **September 2025**

**It will next be reviewed in**

## **Autumn 2026**



**St Joan of Arc School**  
Growing together