



St. Anselm's Catholic Primary School

Church Avenue, Southall, Middlesex, UB2 4BH,

www.stanselmscatholicprimaryschool.co.uk

Whistleblowing Policy

- ✓ Roman Catholic Diocese of Westminster Policy (RCDOW)
- ✓ Incorporating Statement of Procedures for Dealing with Allegations of Abuse Against Staff (Appendix 1)

Policy Start Date	Policy Review Date	Frequency	Committee / Governor Responsible
Autumn 2025	Autumn 2026	Annually	Resources & Premises Committee (R&P)

1 Preamble

The school is a Catholic school, founded by and forming part of the Catholic Church. In addition to the Church's funds which established the school, it is sustained in its mission by receipt of public funds. Accordingly it is accountable to the Catholic community of which it is a part and which provided the school and to the public whose funds it expends.

The school is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees and others with whom we deal, who have serious concerns about any aspect of the school's work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.

This policy makes it clear that you can do so without fear of victimisation, discrimination or disadvantage. This policy is intended to encourage and enable employees to raise serious concerns within the school in the first instance so that it is not necessary to resort to outside agencies.

2 Aims and Scope of this Policy

There are existing procedures in place to enable you to lodge a grievance relating to your own employment. This policy is intended to cover major concerns that fall outside the scope of other procedures. These include:

- conduct which is an offence, a breach of the law or contrary to Church teaching;
- disclosures related to miscarriages of justice;
- health and safety risks, including risks to the public as well as other employees;
- damage to the environment;
- the unauthorised use of public or Church funds;
- possible fraud and corruption;



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- abuse of students; or
- other unethical or immoral conduct.

Thus, any serious concerns that you have about any aspect of service provision or the conduct of employees or governors of the school or others acting on behalf of the school can be reported under this policy. This may be something that makes you feel uncomfortable in terms of known standards, your experience or the values, beliefs and standards to which the school subscribes; is against the school's trust deed or instrument of government or policies; falls below established standards of practice; or amounts to improper conduct.

3 Safeguards

The school will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith.

Any investigation into allegations of potential malpractice will not influence you or be influenced by any disciplinary or redundancy procedures that might affect you.

4 Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness. You also have a duty to observe this confidentiality.

5 Anonymous Allegations

You are encouraged to put your name to your allegation wherever possible. Concerns expressed anonymously are much less powerful but will be considered at the discretion of the school. In exercising this discretion the factors to be taken into account will include:

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

6 Untrue Allegations

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously, or for personal gain, disciplinary action may be taken against you.



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7 How to Raise a Concern

If you reasonably believe that you have discovered serious malpractice within the school you should ideally raise these concerns with your line manager. However, if, for whatever reason this is not possible or appropriate, you should contact the headteacher.

You will be given the opportunity to discuss your suspicions and an appropriate person will be designated as investigating officer, who will arrange for an investigation to take place.

If you suspect that the headteacher may be involved in the malpractice then you should contact the chair of the governing body. If you also suspect involvement by the chair, then you should contact the Diocesan Director of Education.

Within ten working days of your initial meeting, the investigating officer will write to confirm the details of your concern and that an investigation will take place. Throughout the investigation, you will be kept informed of progress and you will normally be advised of the eventual outcome, subject to third party rights. All correspondence will be addressed to your home. If a meeting is needed, it may be arranged off site if you wish, and a union representative or a friend may accompany you. Although records will need to be kept as the enquiries progress, these will be of an anonymous nature.

There can be no prescribed time limits for completion of the investigative process, but it will obviously be in the interests of all concerned if the issue is resolved without delay.

If you have any complaint about the way in which the investigation is being handled then you should raise this with the designated investigating officer in the first instance. If the complaint remains unresolved then you may contact the Diocesan Director of Education with your concerns.

When the investigation is complete a report will be presented to the governing body, which will decide upon the appropriate course of action. Subject to any relevant legal constraints, you will be informed of the action to be taken. If you do not agree with the outcome then you will have seven days in which to make your concerns known to the governing body, via the chairman. If you remain dissatisfied with the response from the governing body, then you may consider contacting the Secretary of State, who has the power to intervene if the governing body appears to be acting unreasonably. You should be aware, however, that this course of action could have serious implications for the school.



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At no stage should you contact the media without the written permission of the Chair of the Governing Body. Such action would be a breach of confidentiality and could result in disciplinary proceedings against you.

8 List of Contacts

This should include names and telephone numbers:

<i>Headteacher</i>	<i>Mrs Savita Martis</i>	<i>020 8574-3906</i>
<i>Chair of the Governing Body</i>	<i>Mrs Gill Wickham</i>	<i>020 8574-3906</i>
<i>Clerk to the Governing Body</i>	<i>Ms Gillian Kennedy</i>	<i>020 8574-3906</i>

Director of Education
 Vaughan House
 46 Francis Street
 London SW1P 1QN
 020 7798 9005

Secretary of State
 Department for Education
 Sanctuary Buildings
 Great Smith Street
 London SW1P 3BT
 020 7925 5000

Headteacher:	<i>S Martis</i>	Date:	Autumn 2025
Chair of Governing Body:	<i>G.M. Wickham</i>	Date:	Autumn 2025



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APPENDIX 1

Dealing with Allegations against the Headteacher, Teaching Staff, Support Staff, School Volunteers and Contractors

Date	Review Date	Designated Child Protection Teacher	Deputy Designated Child Protection Teacher	Nominated Governor

We believe this policy should be a working document that is fit for purpose, represents the school ethos, enables consistency and quality across the school and is related to the following legislation:

- Children Act 1989
- Police Act 1997
- **Data Protection Act 1998**
- Police Act 1997 (Criminal Records) Regulations 2002
- Education Act 2002
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Education and Inspections Act 2006
- Children and Young Persons Act 2008
- Police Act 1997 (Criminal Records) (No. 2) Regulations 2009
- School Staffing (England) Regulations 2009
- Equality Act 2010
- Education Act 2011
- Protection of Freedoms Act 2012

The following documentation is also related to this policy:

- Dealing with Allegations of Abuse against Teachers and other Staff: Guidance for Local Authorities, Headteachers, School Staff, Governing Bodies and Proprietors of Independent Schools (DfE)
- Equality Act 2010: Advice for Schools (DfE)
- Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges (DfE)
- Working Together to Safeguard Children: A Guide to Inter-agency Working to Safeguard and Promote the Welfare of Children



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- Race Disparity Audit - Summary Findings from the Ethnicity Facts and Figures Website (Cabinet Office)

We are aware that the General Data Protection Regulations (GDPR) has entirely replaced the previous Data Protection Act (DPA) making changes to many existing data protection rules and regulations that schools, academies and other educational establishments adhered to under the DPA. The principal aim of the GDPR is to strengthen and unify the safety and security of all data held within an organisation.

We believe a allegation is best defined as a claim or assertion that someone has done something illegal or wrong, typically one made without proof. It could be information that comes to light suggesting an employee, a volunteer or a contractor 'may have hurt or harmed a child, or possibly committing a criminal offence against a child or has behaved in such a way towards a child or young person that indicates they would pose a risk of harm to children if they continue their current employment or in any capacity which involves working with children.'

We recognise that anyone who comes into contact with children such as the Headteacher, teaching staff, support staff, volunteers and contractors are vulnerable to accusations of abuse.

We acknowledge that dealing with allegations is a stressful, demanding, complex and delicate process for all involved. But we will ensure that all allegations will be taken seriously and investigated immediately and impartially in order to provide instant and effective protection for the child concerned and to provide support for the person who is the subject of the allegation. 'The procedures for dealing with allegations need to be applied with common sense and judgement. The following definitions will be used when determining the outcome of allegation investigations:

- **substantiated:** there is sufficient evidence to prove the allegation;
- **malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **false:** there is sufficient evidence to disprove the allegation;
- **unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
- **unfounded:** where there is no evidence or proper basis which supports the allegation being made.

(Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges (DfE))

We will ensure that any contractor, or any employee of a contractor, who is to work at school, will be subjected to the appropriate level of DBS check. We will not allow any



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contractor who has not been checked to work unsupervised. The identity of all contractors will be checked on arrival at school.

We will ensure that an allegation made against a contractor or any employee of a contractor will be investigated by the Headteacher and Designated Safeguarding Lead in the same way as investigating an allegation against a teacher, a member of support staff or a school volunteer.

In the case of an allegation being made against the Headteacher we will ensure the investigation will be conducted by the Chair of Governors who will discuss the allegation with the designated officer.

We wish to create a culture of openness that will allow children and school personnel to make truthful reports of any inappropriate behaviour and in the knowledge that all allegations will be taken seriously.

We encourage all school personnel to protect themselves against false accusations by treating all children with dignity and respect, and to ensure that they never work alone with a child, always maintaining a safe and appropriate distance, avoiding physical contact and being cautious when dealing with sensitive moments.

We must ensure that school personnel do not suffer unnecessarily when false allegations have been made against them and that their careers are not wrecked.

We believe it is our duty to establish the reason why pupils make false allegations against school personnel and to put into place support procedures to help pupils overcome any problems they may have.

We understand that we have a legal duty once an allegation has been to undertake a full investigation, to record the decisions reached and action taken.

We believe allegations against staff can be minimised by having in place safer recruitment strategies, appropriate induction and training, an open and transparent safeguarding ethos, a professional code of conduct, regular staff briefing and discussion of safeguarding issues, and by ensuring that pupils are aware of safeguarding issues through PSHE.

We will do everything possible to maintain confidentiality at all times.

We as a school community have a commitment to promote equality. Therefore, an equality impact assessment has been undertaken and we believe this policy is in line with the Equality Act 2010.



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We all have a responsibility to ensure equality permeates in to all aspects of school life and that everyone is treated equally irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. We want everyone connected with this school to feel safe, secure, valued and of equal worth.

We acknowledge the findings of the Race Disparity Audit that clearly shows how people of different ethnicities are treated across the public services of health, education, employment and the criminal justice system.

The educational section of the audit that covers: differences by region; attainment and economic disadvantage; exclusions and abuse; and destinations, has a significant importance for the strategic planning of this school.

We believe it is essential that this policy clearly identifies and outlines the roles and responsibilities of all those involved in the procedures and arrangements that is connected with this policy.

Aims

- To take all allegations against school personnel seriously and impartially by providing protection for the child and support for the named person in the allegation.
- To ensure compliance with all relevant legislation connected to this policy.
- To work with other schools and the local authority to share good practice in order to improve this policy.

Responsibility for the Policy and Procedure

Role of the Governing Body

The Governing Body has:

- the responsibility to investigate any allegation against the Headteacher;
- delegated powers and responsibilities to the Headteacher to investigate allegations against any member of the school personnel;
- delegated powers and responsibilities to the Headteacher to ensure all school personnel and stakeholders are aware of and comply with this policy;
- responsibility for ensuring that the school complies with all equalities legislation;



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- nominated a designated Equalities governor to ensure that appropriate action will be taken to deal with all prejudice related incidents or incidents which are a breach of this policy;
- responsibility for ensuring funding is in place to support this policy;
- responsibility for ensuring this policy and all policies are maintained and updated regularly;
- make effective use of relevant research and information to improve this policy;
- responsibility for ensuring all policies are made available to parents;
- nominated a link governor to:
 - visit the school regularly;
 - work closely with the Headteacher and the coordinator;
 - ensure this policy and other linked policies are up to date;
 - ensure that everyone connected with the school is aware of this policy;
 - attend training related to this policy;
 - report to the Governing Body every term;
 - annually report to the Governing Body on the success and development of this policy.
- responsibility for the effective implementation, monitoring and evaluation of this policy.

Role of the Chair of Governors

When investigating an allegation against the Headteacher the Chair of Governors will:

- inform the Headteacher about the allegation;
- immediately discuss the allegation with the local authority Designated Officer/s 'to consider the nature, content and context of the allegation and agree a course of action';
- record the decision.

Role of the Headteacher

The Headteacher will:

- investigate all allegations against any member of the school personnel, contractor or any employee of a contractor;
- undertake the following when an allegation is received:
 - Will take the allegation seriously, will keep an open mind and will not promise confidentiality to the informant.
 - Will not undertake an investigation.
 - Will make a written record of the allegation by:



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- using the informants words;
 - including the date, time, place of the incident, and those present;
 - signing and dating the record.
-
- Will immediately contact the local authority's Designated Officer.
 - Will not undertake any discussions without the Designated Officer.
 - Will make a written record with the Designated Officer and others.
 - Will ensure the Designated Officer has full details of the person against who a concern has been raised and the person who is the subject of the concern.
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- refer any allegation against a teacher no longer working in the school to the police;
 - refer any allegation against a teacher no longer teaching to the police;
 - consult with the Local Authority Designated Officer when an allegation has been made;
 - appoint an independent investigator if the allegation is deemed to be serious;
 - share information about the named person in the allegation and the alleged victim with all agencies involved in the investigation;
 - keep the person who is the subject of the allegation informed of the progress of the investigation;
 - provide support for the person who is the subject of the allegation;
 - keep parents informed of the investigation and outcome;
 - provide appropriate support and counselling for the child and parents during the whole process;
 - consider suspending the person who is the subject of the allegation;
 - consider suspending the child if it is felt there is a risk of significant harm to the child from the person accused;
 - make every effort to maintain confidentiality and to prevent unnecessary publicity;
 - provide return to work support such as Occupational Health support for a member of the school personnel returning to work after suspension following a positive conclusion to the investigation;
 - consult with the Local Authority Designated Officer what action should be taken such as referral to children's social care or disciplinary action if the allegation was found to be false;
 - work closely with the link governor and the Designated Child Protection Teacher;
 - provide leadership and vision in respect of equality;
 - provide guidance, support and training to all staff;
 - monitor the effectiveness of this policy by speaking with school personnel, parents and governors.
 - annually report to the Governing Body on the success and development of this policy.

Role of the Designated Safeguarding Lead

The Designated Safeguarding Lead will:



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- ensure the implementation of this policy;
- ensure everyone connected with the school is aware of this policy;
- work closely with the Headteacher and the nominated governor;
- be trained in child protection policy procedures;
- renew training every two years in order to;
 - understand the assessment process
 - understand the procedures of a child protection case conference and child protection review conference
 - understand the specific needs of children in need
 - understand the specific needs of children with special educational needs and those of young carers
 - have in place a secure and accurate record system of all concerns and referrals
- take the lead in dealing with child protection issues;
- keep a confidential Child Protection Register of all those pupils known to be at risk and only if it is confirmed by social services that the child is at risk;
- be trained in working with all agencies;
- familiarise school personnel with the policy and procedures;
- investigate and deal with all cases of suspected or actual problems associated with child protection;
- ensure parents are aware that referrals about suspected abuse or neglect may be made;
- make child protection referrals;
- record all child protection referrals;
- co-ordinate action within the school;
- liaise and seek advice from the Local Authority Designated Officer when the need arises;
- liaise with social care and other agencies;
- transfer the child protection file of any pupil leaving to join another school;
- provide support for any child at risk;
- not promise confidentiality to any child but always act in the interests of a child;
- act as a source of advice within the school;
- help create a culture within the school of listening to children;
- keep up to date with all new guidance on safeguarding children;
- keep all school personnel up to date with any changes to procedures;
- organise appropriate training for school personnel and governors;
- ensure all incidents are recorded, reported and kept confidential;
- keep all paperwork up to date;
- report back to the appropriate school personnel when necessary
- annually review the policy with the Head.



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The Data Protection Officer will:

- have expert knowledge of data protection law and practices;
- inform the school and school personnel about their obligations to comply with the GDPR and other data protection laws;
- ensure data management is strengthened and unified;
- monitor compliance with the GDPR and other data protection laws;
- manage internal data protection activities;
- ensure risk and impact assessments are conducted in accordance with ICO guidance;
- report data breaches within 72 hours;
- ensure individuals have greater control over their personal data;
- ensure that prior to the processing of an individual's data that:
 - the process is in line with ICO guidance;
 - the process is transparent;
 - the individual will be notified;
 - the notification is written in a form that is understandable to children;
 - when sharing an individual's data to a third party outside of school that details for the sharing are clearly defined within the notifications.
- share an individual's data where it is a legal requirement to provide such information;
- process all written subject access requests from individuals within 40 days of receiving them;
- have in place a formal contract or service level agreement with a chosen data processor who is GDPR compliant;
- ensure the secure disposal of redundant data and IT hardware holding data in compliance with ICO guidance;
- train school personnel;
- conduct audits.
- be the first point of contact for supervisory authorities and for individuals whose data is processed;
- keep up to date documentation of all data protection activities.
- work closely with the Headteacher and nominated governor;
- periodically report to the Headteacher and to the Governing Body;
- annually report to the Governing Body on the success and development of this policy.

Role of School Personnel

School personnel will:

- comply with all aspects of this policy;



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- be aware of all other linked policies;
- maintain high standards of ethics and behaviour within and outside school and not to undermine fundamental British values;
- implement the school's equalities policy and schemes;
- report and deal with all incidents of discrimination;
- attend appropriate training sessions on equality;
- report any concerns they have on any aspect of the school community.

Procedure to Report Allegations

School personnel must:

- make a dated and timed written record of the disclosure or incident causing concern about a member of the school personnel or a school volunteer;
- inform the Designated Safeguarding Lead;
- make a dated and timed written record of the disclosure or incident causing concern about the Headteacher;
- inform the Chair of Governors who will deal with the allegation;
- make a dated and timed written record of the disclosure or incident causing concern about a pupil;
- inform the Designated Safeguarding Lead.

The Designated Safeguarding Lead will:

- follow up the referral;
- make records of any discussions and any investigation that takes place;
- decide whether to take the referral further or to monitor the situation;
- keep the person informed who initially reported the allegation of the decision made.

The Chair of Governors will:

- make a dated and timed written record of the disclosure or incident causing concern if no written record has been presented to the Chair of Governors;
- inform the Local Authority Designated Officer.

The Local Authority Designated Officer will:

- work with and alongside the school when dealing with allegations against school personnel;
- call for the intervention of the police and children's care services if they feel the allegation is very serious;



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- advise the school of the course of action if they consider the intervention by police and children's care services is not necessary;
- consult with the school what action should be taken such as referral to children's social care or disciplinary action if the allegation was found to be false.

The Named Person in the Allegation

The named person in the allegation will:

- be kept informed of the course of action after the initial consultation with the Local Authority Designated Officer;
- be kept informed of all stages of the investigation;
- be advised to contact their union or professional association as soon as an allegation has been made;
- be advised by their union or professional association at all stages of the investigation.

Suspension of the Named Person in the Allegation

Suspension will only take place if:

- a child or children are at risk;
- the allegation is of a very serious nature;
- it will help in the smooth running of the investigation.

Records of Allegations

A detailed record of each allegation must be kept which clearly shows the:

- nature of the allegation
- follow-up action
- decision reached
- action taken

Written records must be:

- kept on the person's confidential personnel file with a copy given to the person concerned
- kept for a period of 10 years

Details of allegations that are found to be malicious (that is allegations made to deliberately to deceive) will be removed from personnel records and will not be included in any future references.



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In cases of an allegation being deliberately invented or malicious we will consider taking action against those who have made false accusations.

Role of Parents/Carers

Parents/carers will:

- be aware of and comply with this policy;
- be aware that under section 141F of the Education Act 2002 that there is a prohibition on reporting or publishing allegations about teachers.

Confidentiality

When an allegation has been made and during the investigation we will do everything possible to maintain confidentiality.

Raising Awareness of this Policy

We will raise awareness of this policy via:

- the School Handbook/Prospectus;
- the Staff Handbook;
- the school website;
- meetings with school personnel and volunteers;
- reports such as the annual report to parents and Headteacher reports to the Governing Body;
- information displays in the main school entrance.

Training

All school personnel:

- have equal chances of training, career development and promotion
- receive training on induction which specifically covers:
 - All aspects of this policy
 - Safeguarding and Child Protection
 - School Personnel Code of Conduct
 - Disciplinary Procedure
 - Equal opportunities



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Inclusion

- receive periodic training so that they are kept up to date with new information
- receive equal opportunities training on induction in order to improve their understanding of the Equality Act 2010 and its implications.

Equality Impact Assessment

Under the Equality Act 2010 we have a duty not to discriminate against people on the basis of their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation.

This policy has been equality impact assessed and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any pupil and it helps to promote equality at this school.

Monitoring the Implementation and Effectiveness of the Policy

The practical application of this policy will be reviewed annually or when the need arises by the coordinator, the Headteacher and the nominated governor.

A statement of the policy's effectiveness and the necessary recommendations for improvement will be presented to the Governing Body for further discussion and endorsement.

Linked Policies

- Data Protection and the General Data Protection Regulation (GDPR)
- Disciplinary Procedure
- Safeguarding and Child Protection
- School Personnel Code of Conduct

Important Telephone Numbers	Local Authority Designated Officer (LADO)	
	Social Services Referrals	
	Out of Hours Social Services	
	Police	

See Appendices Documents section on Policies for Schools Website

- Frequency of Policy Monitoring
- Monitoring Implementation and Policy Effectiveness Action Plan



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- Initial Equality Impact Assessment
- Policy Evaluation
- Policy Approval Form