

## Whistleblowing Policy

<b>Approved By</b>	Chief Executive Officer	<b>Date:</b>	21/11/2025
<b>Author</b>	People and Culture Leader	<b>Date:</b>	01/11/2025
<b>Board Ratification</b>	N/A	<b>Date:</b>	N/A
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<b>Last reviewed on:</b>	21/11/2025		
<b>Next review due by:</b>	30/11/2027		

## **1. Aims**

### **1.1** This policy aims to:

- Encourage individuals affected to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated, and that their confidentiality will be respected.
- Let all staff in the Trust know how to raise concerns about potential wrongdoing in or by the Trust.
- Set clear procedures for how the Trust will respond to such concerns.
- Let all staff know the protection available to them if they raise a whistleblowing concern.
- Assure staff that they will not be victimised for raising a legitimate concern through the steps set out in the policy, even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue).

**1.2** This policy does not form part of any employee's contract of employment and may be amended at any time. The policy applies to all employees or other workers who provide services to the Trust in any capacity, including self-employed consultants or contractors who provide services on a personal basis and agency workers.

## **2. Legal Framework**

**2.1** The requirement to have clear whistleblowing procedures in place is set out in the [Academy Trust Handbook](#).

**2.2** This policy has been written in line with the above document, as well as [government guidance on whistleblowing](#). We also take into account the [Public Interest Disclosure Act 1998](#).

**2.3** This policy complies with our funding agreement and articles of association.

## **3. Definition of whistleblowing**

**3.1** Whistleblowing covers concerns made that report wrongdoing that is "in the public interest". Examples of whistleblowing include (but are not limited to):

- Criminal offences, such as fraud or corruption
- Pupils' or staff health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Damage to the environment
- Miscarriages of justice
- Attempts to cover up the above, or any other wrongdoing in the public interest.

**3.2** A whistleblower is a person who raises a genuine concern relating to the above.

**3.3** Not all concerns about the Trust, or individual schools in the Trust, count as whistleblowing. For example, personal staff grievances such as bullying or

harassment do not usually count as whistleblowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance.

**3.4** When staff have a concern they should consider whether it would be better to follow our staff grievance or complaints procedures. If you are uncertain whether something is within the scope of this policy you should seek advice from the Director of Operations.

**3.5** Protect (formerly Public Concern at Work) has:

- Further guidance on the difference between a whistleblowing concern and a grievance that staff may find useful if unsure
- A free and confidential advice line.

## **4.0 Procedure for staff to raise a whistleblowing concern**

**4.0.1** We hope that in many cases staff will be able to raise any concerns with their line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.

**4.0.2** When individuals raise their concern, they will include the following information as far as possible:

- The background and history of the concern
- Any relevant names, dates and places
- The reasons for the concern.

**4.0.3** The Trust encourages individuals to let their identity be known when they raise concerns, as anonymous concerns can be challenging to investigate.

**4.0.4** Once an individual has raised a concern, the Trust will be responsible for investigating it.

**4.0.5** In certain instances, it may be appropriate for the individual to raise the concern with an outside agency, e.g. the police, depending on the severity of the concern. Equally, it may be appropriate for the individual to request that their trade union raises the matter.

**4.0.6** If a member of staff feels like they are unable to raise a safeguarding-related concern with the trust (including school colleagues) they are able to contact the NSPCC Whistleblowing Helpline on 0800 028 0285 or the LADO.

**4.0.7** The Trust, or the appropriate external agency, will acknowledge receipt of a disclosure but, unless additional information is required, will not contact or engage in dialogue with the whistleblower, as this may undermine the legitimacy of the investigation outcome.

## **4.1 When to raise a concern**

**4.1.1** Staff should consider the examples in section 3 when deciding whether their concern is of a whistleblowing nature. Consider whether the incident(s) was illegal, breached statutory or Trust procedures, put people in danger or was an attempt to cover any such activity up.

## **4.2 Who to report to**

**4.2.1** If the matter is more serious, or staff feel that their concern has not been adequately addressed by their line manager, concerns can be raised with the Headteacher. However, if the employee feels it would be inappropriate to report their concerns to the Headteacher, they should escalate the matter to the Chief Executive Officer (CEO).

**4.2.2** If the concern is about the headteacher or CEO, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the chair of the Board of Trustees.

**4.2.3** Central team staff should report their concern to the CEO. If the concern is about the CEO, or it is believed they may be involved in the wrongdoing in some way, the central team staff should report the concern to the Chair of Trustees.

## **4.3 How to raise the concern**

**4.3.1** Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter.

## **5. Trust procedure for responding to a whistleblowing concern**

### **5.1 Investigating the concern**

**5.1.1** When a concern is received– the person who has received the concern from here will be referred to as the ‘recipient’ – will:

- Meet with the person raising the concern within a reasonable time. The person raising the concern may be accompanied by a trade union or professional association representative
- Gather and record as much detail as possible about the concern during the meeting. If it becomes apparent the concern is not of a whistleblowing nature, the recipient should handle the concern in line with the appropriate policy/procedure
- Reiterate at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken (see section 6 of this policy)
- Emphasis that the concern will be treated with appropriate confidentiality by all parties involved in the investigation. While full anonymity cannot always be guaranteed, every effort will be made to protect the identity of the whistleblower where possible.

- Clarify that the person raising the concern is expected to maintain discretion and not discuss the matter outside of the formal process, to protect the integrity of the investigation and the individuals involved.
- Determine whether there is sufficient cause for concern to warrant further investigation. If there is:
  - The recipient should then arrange a further investigation into the matter, involving the CEO and Peoples and Culture Leader, if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In others, they may need to report the matter to the police.
  - The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps.

## **5.2 Outcome of the investigation**

**5.2.1** Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether or not a referral is required to an external organisation, such as the local authority or police.

**5.2.2** They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.

**5.2.3** Beyond the immediate actions, the CEO, Trustees and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

**5.2.4** Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

## **6. Malicious or vexatious allegations**

**6.1** Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern.

**6.2** If, however, an allegation is shown to be deliberately invented or malicious, the Trust will consider whether any disciplinary action is appropriate against the person making the allegation. Any such action would be taken in accordance with the Trust's Disciplinary Policy.

## **7. Escalating concerns beyond the Trust**

**7.1** The Trust encourages staff to raise their concerns internally, in line with section 4 of this policy, but recognises that staff may feel the need to report concerns to an external body. A list of prescribed bodies to whom staff can raise concerns with which is included [here](#).

**7.2** It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external.

**7.3** The Protect advice line, referred to in section 3 of this policy, can also help staff when deciding whether to raise the concern to an external party.

**7.4** Staff can refer their concerns to the DfE online at: [Blowing the whistle to the Department for Education - GOV.UK](https://www.gov.uk/guidance/report-a-concern-to-the-department-for-education) or by telephone on: 0370 000 2288.

## **8. Protection and support for whistleblowers**

**8.1** It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

**8.2** Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Director of Operations immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

**8.3** You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

## **9. Approval**

**9.1** This policy will be reviewed every 2 years.

**9.2** These procedures have been agreed by the Board of Trustees, who will approve them whenever reviewed.

## **10. GDPR**

Data will be processed in line with the requirements and protections set out in the UK General Data Protection Regulation and the Trust's Data Protection Policy / Privacy Notice.