Whistleblowing Policy

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Owner	Director of People and Culture
Applies to	All Trust Schools, all Trust staff

Version	Date	Reason
1.0	October 2020	To establish a Trust wide policy
1.1	October 2023	Periodic review
1.2	September 2024	Periodic review - review cycle changed to annual
1.3	September 2025	Periodic review - no changes
1.4	September 2026	Amendment to 1 & 2

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1. Introduction

1.1 The Trust Board (“we”, “us”) is committed to the highest possible standards of honesty and

integrity, and we expect all staff to maintain these standards in accordance with our Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

1.2 This policy has been implemented following consultation with staff and recognised trade unions.

1.3 This policy does not form part of any employee's contract of employment and it may be amended at any time.

2. Scope and purpose

2.1 The aims of this policy are:

(a) To encourage staff to report suspected wrongdoing wherever possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.

(b) To provide staff with guidance on how to raise concerns.

(c) To reassure staff that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

2.2 This policy applies to all employees of the Trust, trustees, local school committee members, consultants, contractors, casual and agency staff and volunteers (collectively referred to as staff in this policy).

If the issue is...	**Use this Policy:**	**Primary Focus**
A personal matter affecting only you (e.g., pay, promotion, or how you are personally treated).	Grievance Procedure	Individual Resolution
Interpersonal conduct between colleagues (e.g., bullying, offensive jokes, or "witnessed" rude behavior).	Dignity at Work (Anti-Bullying & Harassment)	Professional Conduct
Sexual Harassment or unwanted conduct of a sexual nature.	Preventing Sexual Harassment at Work Policy	Specialised Protection
A "Public Interest" risk (e.g., financial fraud, danger to health/safety, or systemic safeguarding failures).	Whistleblowing Policy	Public Duty & Safety

3. What is whistleblowing?

3.1 Whistleblowing is the disclosure of information which relates to a reasonable belief of suspected wrongdoing or dangers at work. The law provides protection for workers who raise legitimate concerns about specified matters or "qualifying disclosures". A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that there are wrongdoing or dangers at work. This may include:

(a) criminal activity;

(b) miscarriages of justice;

(c) danger to health and safety;

(d) damage to the environment;

(e) failure to comply with any legal or professional obligation or regulatory requirements;

(f) bribery;

(g) financial fraud or mismanagement;

(h) negligence;

(i) breach of our internal policies and procedures including our Code of Conduct; (j) conduct likely to damage our reputation;

(k) unauthorised disclosure of confidential information;

(l) unethical behaviour

(m) the deliberate concealment of any of the above matters.

3.2 A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

3.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure or Anti-harassment and Bullying Policy as appropriate.

3.4 If you are uncertain whether something is within the scope of this policy you should seek advice from your Headteacher or another of member of the Trust's senior leadership team.

3.5 If your concern is in relation to safeguarding and the welfare of pupils at the school, you should consider whether the matter is better raised under the child protection policy and in accordance with the arrangements for reporting such concerns, i.e. via the designated safeguarding lead, although the principles set out in this policy may still apply.

4. Raising a whistleblowing concern

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

4.2 However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, or they are the subject of the complaint, then you can raise the matter with:

(a) Your Headteacher
(b) The Chair of your school's Local school committee
(c) The Trust's CEO
(d) The Chair of the Trust's Performance, Standards and Staffing Committee
(e) The Chair of the Trust Board
(f) A Union Representative

4.3 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

4.4 We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

5. Confidentiality and data protection

5.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

5.2 We prioritise the safety of the disclosure made by staff. Proper investigation may be more difficult

or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the other contact points listed in paragraph 4.2 and appropriate measures can then be taken to preserve confidentiality.

If you are in any doubt you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offers a confidential helpline. Their contact details are given at the end of this policy. We are committed to ensuring the safety of staff who make a disclosure.

5.3 Where we receive anonymous complaints we will make a determination about whether to investigate based on:

(a) the seriousness of the issue raised
(b) the credibility of the concern; and
(c) the likelihood of confirming the allegation from other sources

5.4 As part of the application of this policy, the Trust may collect, process and store personal data in accordance with our data protection policy. We will comply with the requirements of Data Protection Legislation (being (i) the General Data Protection Regulation ((EU) 2016/679) (unless and until the GDPR is no longer directly applicable in the UK) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then (ii) any successor legislation to the GDPR or the Data Protection Act 2018, including the Data Protection Act 2018) in the collecting, holding and sharing of information in relation to our workforce. Records will be kept in accordance with our Staff Privacy Notice, Data Protection Policy and in line with the requirements of Data Protection Legislation.

6. External disclosures

6.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

6.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. 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. Public Concern at Work holds a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy. Alternatively the list is available from the Department for Business, Energy & Industrial Strategy. (https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2)

6.3 Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a contractor, supplier or service provider. The law allows you to raise a concern with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the other individuals set out in paragraph 4.2 for guidance.

7. Investigation and outcome

7.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

7.2 In some cases we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) will collate findings on the matter and may make recommendations for change to enable us to minimise the risk of future wrongdoing. These will be reviewed by us and, where appropriate, actions will be delegated to the Trust CEO for implementation.

7.3 We will aim to keep you informed of the progress of the investigation, its likely timescale and outcome. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

7.4 If we conclude that a whistleblower has made false allegations maliciously, or with a view to personal gain, the whistleblower may be subject to disciplinary action.

8. If you are not satisfied

8.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

8.2 In some circumstances you may feel it may be appropriate for you to make an external disclosure. You may wish to take advice from Public Concern at Work or another independent source of advice.

9. Protection and support for whistleblowers

9.1 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.

9.2 Staff must not suffer any detrimental treatment as a result of raising a genuine 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 raise it formally using our Grievance Procedure.

9.3 Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct may be subject to disciplinary action.

10. Review of policy

10.1 This policy is reviewed annually. We will monitor the application and outcomes of this policy to ensure it is working effectively.

Appendix 1

Equality Impact Assessment/ Analysis (EIA)

Step 1: Scoping and Identifying the Aims	
School/Service	People Department
Title of Change:	Whistleblowing Policy
What are you completing this EIA for?	Policy
Is this a new or existing activity or change?	Existing
What are the main aims / objectives of the changes? What is the context for this EIA? e.g., policy, practice, service, curriculum proposal or project? Why is the activity/change needed? E.g., The policy or practice affect different "protected groups" differently?, enhancing of services, education	Ensure policy is still relevant and the most current legislation is being adhered to.
Name/s of people/Date undertaking analysis:	Shani Davies, Director People & Culture
Who will be affected by this activity/change? eg pupils/students, service users, employees, wider community	All Staff in scope of this policy
Does it relate to an area with known inequalities?	

E.g., access to service for disabled people, pupils/students, vulnerable pupils/students, SEND, racist bullying etc.	
EIA Schedule: When will the EIA be reviewed?	

Step 2: Assessing the Impact

Detail any positive or negative impacts of this document /policy on pupils/students and staff in the box below. If there is no impact, please select "not applicable"

Protected Characteristic	Positive Impact(s)	Negative Impact(s)	NA	Action to address negative impact: *(e.g. adjustment to the policy)*
Sex consider issues for: men and women, non-binary.	Y			
Gender reassignment E.g. privacy of data and harassment	Y			
Disability e.g., attitudes, physical, social barriers, visible and non-immediately visible disabilities, neurodivergence, learning disability	Y			
Age e.g., consider all ages but there may be some issues that relate for example to older people/younger people	Y			
Sexual Orientation **consider** heterosexual as well as lesbian, gay and bisexual (and other sexual orientations)	Y			
Pregnancy and maternity e.g., childcare, working arrangements, part time working	Y			
Marriage and civil partnership	Y			
Religion or belief consider religions, beliefs, or no belief	Y			
Ethnicity / Race e.g., language barriers, different ethnic groups/nationalities	Y			
Socio-economic factors e.g., resident status – socio economic/low-income groups, migrants, carers, impacts on children and families (please state)	Y			
Mental health e.g. short term, long term, acute, fluctuating mental health conditions, impacts	Y			

If you answer yes to any of the following, you MUST complete the evidence column explaining what information you have considered which has led you to reach this decision.

Assessment Questions	Yes / No	Please document evidence / any mitigations
In consideration of your document development, did you consult with others, for example, external organisations, employees, pupils/students, carers or community groups?	Yes	Staff and Trade Unions

Have you taken into consideration any regulations, professional standards?	Yes	Public Interest Disclosure Act 1998, Equality Act 2010, Protection from Harassment Act 1997, Worker protection Act 2023, Health and Safety at Work Act 1974

Step 3: Review, Risk and Action Plans

Low – No major change	Medium - Adjust the policy	High – Stop and remove
The activity is robust and there is no potential for discrimination, and you have taken all appropriate opportunities to advance and foster relations between groups.	This involves taking steps to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential effect.	If there are adverse effects that are not justified and cannot be mitigated, you will want to consider stopping the policy/project altogether. If the activity shows unlawful discrimination, it must be removed or changed.

How would you rate the overall level of impact / risk to the school / service / Trust if no action was taken?	Low	Medium	High
	x☐	☐	☐
What action needs to be taken to reduce or eliminate the negative impact?	N/A		
Who will be responsible for monitoring and regular review of the document / policy / change?	Director People & Culture		

Step 4: Authorisation and sign off

I am satisfied that all available evidence has been accurately assessed for any potential impact on pupils/students and employees with protected characteristics in the scope of this project / change / policy / procedure / practice / activity. Mitigation, where appropriate has been identified and dealt with accordingly.

Equality Assessor:	*Shani Davies*	***Date:***	*19/2/26*

Protect (Independent whistleblowing charity)	Helpline: (020) 3117 2520 Website: https://protect-advice.org.uk/
NSPCC whistleblowing helpline	Helpline: 0800 028 0285 https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/ E-mail: help@nspcc.org.uk
Department for Education	Telephone: 0370 000 2288 Website: www.gov.uk/government/organisations/depart ment-for-education
Ofqual	Telephone: 0300 303 3344 Website: www.gov.uk/government/organisations/ofqual