

Policy Name:	Whistle-blowing Policy
Policy Type:	Statutory
To Be Reviewed:	Biennially
Issue Date:	2nd October 2025
Review Date:	2nd October 2027
Adopted by:	Board of Trustees
Policy Owner	Alex Butt

1 Aims

1.1 This policy aims to:

- To support us in ensuring we are conducting our activities with the highest standards of integrity and honesty
- Encourage individuals 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
- To assist us in early detection of any inappropriate behaviour or practices within our trust
- 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 whistle-blowing 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.

1.3 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 Definition of whistle-blowing

2.1 Whistle-blowing covers concerns made that report wrongdoing that is "in the public interest". Examples of whistle-blowing include (but aren't limited to):

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

- Damage to the environment
- 2.2 Employees are encouraged to 'blow the whistle' on malpractice. By being alerted to any potential malpractice at an early stage we can take the necessary steps to safeguard the interests of all employees and protect our business. The employee or worker does not have to be able to prove the allegations, but should have a reasonable and genuine belief that the information being disclosed is true: some allegations may prove to be unfounded, but we would prefer the issue or concern to be raised, rather than run the risk of not detecting a problem early on.
- 2.3 A whistleblower is a person who raises a genuine concern relating to the above.
- 2.4 Not all concerns about the Trust, or individual schools in the Trust, count as whistle-blowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistle-blowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance.
- 2.5 When a member of staff has a concern they should consider whether it would be better to follow our staff grievance or procedure.
- 2.6 Protect (formerly Public Concern at Work) has:
- Further guidance on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure <https://protect-advice.org.uk/>
 - A free and confidential advice line <https://protect-advice.org.uk/advice-line/>

3 Procedure for staff to raise a whistle-blowing concern

3.1 When to raise a concern

Staff should consider whether their concern is of a whistle-blowing 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.

3.2 Who to report to

School-based staff and the executive team should report their concern to the Headteacher or CEO. If the concern is about the 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.

3.3 How to raise the concern

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

- 3.4 Where requested, we will respect (so far as we can legally) the confidentiality of any whistleblowing complaint received, but cannot guarantee that the investigation process will not result in colleagues speculating on the identity of the whistleblower. It must be appreciated that it will be easier to follow up and to verify complaints if the individual is prepared to give their name, and unsupported anonymous complaints and allegations are much less powerful and therefore will be treated with caution.

4 Trust procedure for responding to a whistle-blowing concern

- 4.2 Upon receipt of a concern, we will respond in a reasonable and appropriate manner. This may involve, in the first instance, making internal enquiries. It may be necessary to carry out an investigation which may be formal or informal, depending on the nature of the concern raised.
- 4.3 A confidential meeting may be arranged, and the employee or worker may ask a work colleague or trade union representative to act as a companion.
- 4.4 As far as possible, the person raising the concern will be kept informed of the outcome of any enquiries and investigations we conduct and what action, if any, has been taken. Individuals will not be informed of any matter which would infringe on the duty of confidentiality to others.
- 4.7 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.
- 4.8 Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

5 Malicious or vexatious allegations

- 5.1 If it should become clear that the procedure has not been invoked in good faith, for example for malicious reasons or to pursue a personal grudge against another employee or the Trust this will constitute misconduct and will be dealt with under our disciplinary policy.
- 5.2 Under the Public Interest Disclosure Act 1998, disclosures to persons outside our business should only be made if the individual honestly and reasonably believes the allegation to be true. The making of malicious allegations relating to our activities to external persons will constitute gross misconduct and disciplinary action (up to and including dismissal) and/or legal action may be taken against the whistleblower.