

# Whistleblowing Policy

<b>Trust Lead:</b>	<b>Director/HR</b>
<b>Governor Lead:</b>	<b>Chair of Personnel Committee/ Headteacher</b>
<b>Nominated Lead Member of Staff:</b>	<b>Headteacher</b>
<b>Status &amp; Review Cycle:</b>	<b>Statutory</b>
<b>Last Review Date:</b>	<b>Spring Term 2026</b>
<b>Next Review Date:</b>	<b>Spring Term 2028</b>

## Introduction

Whistleblowing is the reporting by employees or ex-employees, of wrongdoing or malpractice within the workplace. The policy is designed to give employees the means to report such concerns and equally to protect them from malicious or false allegations. The Public Interest Disclosure Act 1998 is the key legal framework.

## Scope

The policy covers reporting concerns where an individual believes the behaviour to be illegal, against a relevant code of practice, is in contradiction to what the employee knows has been instructed within the Trust or relates to issues such as fraud, malpractice, mismanagement, unethical behaviour, child protection concerns and so on. Examples include:

1. Inappropriate use of Trust funds
2. Criminal activity
3. Damage to the assets of the Trust
4. Abuse of position
5. Tampering with documentation
6. Serious concerns regarding professional conduct
7. Serious concerns regarding unsafe behaviour and risk to others

The list is not exhaustive

It applies to fellow employees, management, workers, the Governing Body and contractors or agency workers acting on behalf of the Trust.

## **Principles**

1. Whistleblowing should be done in good faith and in the public interest.
2. Employees may feel unable to speak out due to loyalty to a colleague or the Trust. This policy ensures that any person may speak out in confidence without fear of discrimination or victimisation.
3. It is important that anyone connected with the Trust should raise issues that they feel are of concern so that they can be investigated and dealt with, thus preventing such issues causing any harm either to a pupil, or to the efficiency and reputation of the Trust.
4. The Trust recognises that a member of staff may wish to have guidance or representation from their Trade Union officer(s) in the usage of this policy.
5. Employees who report an issue or concern in good faith will not be at risk of any form of sanction or retribution, provided that they have not maliciously or frivolously raised a matter that they know to be untrue.
6. The Trust will not tolerate any form of harassment or victimisation of anyone raising a genuine concern and will take disciplinary action against those found retaliating.
7. We hope that you will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort not to disclose your identity and only reveal it where necessary to those involved in investigating your concern.
8. If any concern is raised or allegation is made that cannot be proved after investigation, no action whatsoever will be taken against the person who reported it.

## **Data Protection**

The Trust will process any personal data disclosed as part of a whistleblowing concern in accordance with the UK General Data Protection Regulation (UK-GDPR) and associated Data Protection Act (DPA, 2018).

All concerns will be treated with the utmost confidence and held securely by the Trust; access to whistleblowing disclosures is strictly limited to a small number of staff for the purposes of dealing with the disclosure only.

In order to thoroughly investigate a disclosure, the Trust will ask for the full name of the whistleblower as we may need further information to action an investigation. The Trust will make every effort to maintain the integrity and confidentiality of the whistleblower's identity. However, there may be instances in which we need to disclose the name of the whistleblower for example:

- Seeking a witness statement to enact disciplinary procedures
- If the concern meets the threshold to make a referral to the relevant authorities

The Trust will notify the whistleblower in instances where we intend to disclose their identity and seek their written consent to do so where appropriate. We will however endeavour to redact the whistleblowers name if it is not relevant to the content of the disclosure.

Please note that if the Trust feel that the processing of personal data is necessary to protect the whistleblower or another individual that is at immediate risk of harm, we will do so without seeking the whistleblowers consent. Data protection law provides alternative provisions to process personal data to safeguard children and individuals at risk of harm.

Please refer to our 'Data Protection Policy' for further information.

### **Raising a concern**

1. If you have any concerns, you should report the matter to the headteacher or a member of the senior leadership team (SLT) at your earliest opportunity. In the event that you feel unable to raise the concern with the aforementioned parties for whatever reason, please contact the Chair of Governors.
2. You can raise concerns using the 'Staff Safe' features of the CPOMS software (where available). Guidance is available in the appendix section of this policy. Alternatively, concerns can be raised verbally or in writing.
3. Although you will not be required to provide material evidence to substantiate an issue or potential problem, you will be required to demonstrate to the person contacted that your concern is justified.
4. If any other interested person or persons have the same concerns as yourself, you may wish to invite them to present at any meeting or interview in connection with a concern you have raised.
5. You may wish to invite a colleague or Trade Union representative to any meeting in connection with a concern you have raised. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
6. If any concerns are justified that cannot be resolved by the actions of the individual to whom they are reported, they may be reported back to the full Board of Governors and/or Board of Directors. Unless the concern is an extremely serious safety or criminal issue, this will only occur if you wish it to.
7. Even if the matter must, for reasons of the importance of the issue raised, be referred back to the Board of Governors, and/or Board of Directors, you will be fully consulted about how this should be done, and the matter kept confidential if necessary.
8. Notes of any meetings will be taken and you will be asked to review them and sign as an accurate account.
9. If you feel the matter is too sensitive or serious to raise internally, you may wish to contact the Police, or another agency, directly. We strongly recommend that you seek advice before reporting a concern to anyone external. The Whistleblowers Charity 'Public Concern at Work' operates a confidential helpline.

### **How the matter will be taken forward**

1. If it is not possible to resolve the issue immediately without investigation, the Line Manager to whom the matter has been reported will then either investigate the matter themselves or delegate another person to do so.
2. The matter may then be investigated by the Headteacher, Chair of Governors, or other appointed person, or referred to another party as is deemed appropriate. Such a party may include: the full Governing body, the Trust Board or an external agency such as the Police or a relevant ombudsman. You will be fully consulted before the matter is delegated to another person or referred to another body.
3. It may be possible that the matter raised can be dealt with under existing internal procedures, in which case you will be notified immediately and any relevant action taken.
4. A written acknowledgement of your concerns will also be sent to you within ten working days of any initial meeting. This response will also give some indication of if and how the matter is being dealt with and the timescales involved in any such investigation being made or action being taken. If no investigation is being made or action is being taken, the letter will explain the reasons for this.
5. If the matter requires investigation or action, whoever is appointed to do so will liaise with you to ensure that any difficulties you may experience as a result of raising the concern are minimal. It may be impossible to retain confidentiality should the matter become an issue, for example for the Trust's disciplinary policies, or even a matter for the Police.
6. When an outcome has been reached of any investigation, you will be informed of the details of this and any subsequent action that will be taken.

### **Points of contact**

This policy is intended to give you a method of pursuing any matters of concern you have within the framework of the Trust. However, if you feel that it would be more appropriate to seek external support or raise the matter with an outside agency, you may consider the following suggestions helpful:

Charities or Voluntary Organisations such as Protect ([protect-advice.org.uk](http://protect-advice.org.uk))

Your Trade Union

The Citizens Advice Bureau

The Health and Safety Executive

The Police

## **Appendix 1: CPOMS Staff Safe**

The Trust realise that making a disclosure can be uncomfortable. Moreover, busy schedules can sometimes be a hinderance to sharing information with the right people at the right time which is why the Trust has introduced the 'Staff Safe' features of CPOMS.

The software aims to:

- simplify the reporting and recording of information in one centralised, secure platform
- support the wellbeing of staff
- meet our safeguarding compliance requirements
- reduce the risk to students and other members of the Trust community

The Trust have customised the 'Staff Safe' platform so that those with access can easily select and log the type of concern they would like to make and assign it to the relevant member of SLT/HR to pick up at their earliest opportunity. Moreover, the advanced control measures of CPOMS help to ensure that any data submitted is as secure as possible.