Whistleblowing Policy

Staff Responsible:	**Mrs A Sheridan**
Date of Issue:	September 2026
Review Date:	September 2027

CONTENTS

1. Introduction
2. Aims
3. Scope
4. Responsibilities
5. What is Whistleblowing?
6. Protection and Support for Whistleblowers
7. Confidentiality
8. Anonymous Allegations
9. Untrue or Malicious Allegations
10. How to Make a Disclosure
11. How the Academy Will Respond
12. Independent Advice
13. External Disclosure
14. Record Keeping and Data Protection

1. INTRODUCTION

The Academy is committed to the highest standards of openness, honesty, integrity and accountability. We recognise that employees, volunteers and others working with the Academy are often the first to become aware of concerns about improper conduct, wrongdoing, risks to health and safety, safeguarding failures or other serious matters.

The Academy encourages anyone with genuine concerns to come forward and raise them at the earliest opportunity. This policy provides a clear process for reporting concerns and explains the protections available to those who speak up in the public interest.

This policy has been developed with reference to:

- The Public Interest Disclosure Act 1998 (PIDA)
- Employment Rights Act 1996
- Government whistleblowing guidance
- Working Together to Safeguard Children (2026)
- Keeping Children Safe in Education (2026)
- Guidance from Protect (formerly Public Concern at Work)
- Relevant safeguarding, employment and governance legislation

The Academy will review this policy annually to ensure it remains effective and compliant with current legislation and guidance.

2. AIMS

This policy aims to:

- Encourage employees and others working with the Academy to feel confident in raising concerns.
- Promote a culture of openness and accountability.
- Reassure individuals that concerns raised in good faith will be taken seriously.
- Protect whistleblowers from victimisation, harassment or detrimental treatment.
- Provide clear procedures for reporting concerns.
- Ensure concerns are investigated appropriately.
- Provide feedback on action taken where possible.
- Explain how concerns may be escalated if an individual is dissatisfied with the response received.

3. SCOPE

This policy applies to:

- Employees
- Agency workers
- Volunteers
- Trustees
- Governors
- Contractors
- Consultants
- Apprentices
- Suppliers

- Anyone working on behalf of the Academy

This policy applies regardless of length of service or contractual status.

4. RESPONSIBILITIES

Board of Trustees

The Board of Trustees has overall responsibility for:

- Ensuring the Academy has effective whistleblowing arrangements.
- Reviewing the effectiveness of this policy.
- Monitoring outcomes arising from concerns raised.
- Ensuring individuals who raise concerns are protected appropriately.

Whistleblowing Officer

The Deputy Headteacher acts as the Academy's Whistleblowing Officer and has responsibility for:

- Day-to-day operation of this policy.
- Supporting employees who raise concerns.
- Maintaining confidential records.
- Monitoring whistleblowing activity.
- Reporting anonymised information to Trustees where appropriate.
- Ensuring appropriate training is provided.

All Staff

All staff are responsible for:

- Raising concerns where they reasonably believe wrongdoing has occurred, is occurring, or is likely to occur.
- Cooperating fully with any investigation.
- Maintaining confidentiality throughout the process.

5. WHAT IS WHISTLEBLOWING?

Whistleblowing is the disclosure of information relating to suspected wrongdoing, malpractice, danger or illegal activity occurring within or connected to the Academy.

Examples include:

- Criminal offences.
- Fraud or financial irregularities.
- Bribery or corruption.
- Failure to comply with legal obligations.
- Breaches of statutory guidance.
- Health and safety risks.
- Miscarriages of justice.
- Environmental damage.
- Negligence.

- Abuse of authority.
- Safeguarding failures.
- Physical, emotional or sexual abuse.
- Discrimination or harassment.
- Breaches of Academy policies or procedures.
- Unauthorised disclosure of confidential information.
- Conduct likely to damage the Academy's reputation.
- Deliberate concealment of any of the above.

A whistleblower is a person who raises a genuine concern which they reasonably believe is in the public interest.

What is NOT Whistleblowing?

This policy should not be used for concerns relating solely to an employee's own employment situation, including:

- Pay disputes
- Working hours
- Personal disagreements
- Performance management concerns
- Employment grievances

Such matters should normally be addressed through the Grievance Policy or other relevant procedures.

6. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

The Academy recognises that raising concerns can be difficult and stressful.

Individuals who raise concerns in good faith will be supported and treated fairly, even if their concerns are not ultimately substantiated.

The Academy operates a zero-tolerance approach to retaliation against whistleblowers.

No individual will suffer detrimental treatment because they have raised a concern in good faith.

Detrimental treatment may include:

- Dismissal
- Disciplinary action
- Harassment
- Bullying
- Victimisation
- Threats
- Unfair treatment
- Denial of opportunities

Any employee found to have victimised or retaliated against a whistleblower may be subject to disciplinary action.

The Academy is committed to ensuring that no individual suffers discrimination because of:

- Age
- Disability

- Sex
- Race
- Religion or belief
- Pregnancy or maternity
- Marriage or civil partnership
- Sexual orientation
- Gender reassignment

7. CONFIDENTIALITY

The Academy will make every effort to protect the identity of individuals who raise concerns.

Where confidentiality is requested:

- Identities will not normally be disclosed without consent.
- Information will only be shared where absolutely necessary.
- Any requirement to disclose identity will be discussed with the individual wherever possible.

There may be circumstances where legal obligations require information to be disclosed, including court proceedings or regulatory investigations.

8. ANONYMOUS ALLEGATIONS

The Academy encourages individuals to identify themselves when raising concerns as this greatly assists investigation and feedback.

Anonymous concerns will still be considered.

In deciding whether to investigate anonymous allegations, the Academy will consider:

- The seriousness of the concern.
- The credibility of the information.
- The likelihood of obtaining supporting evidence.
- Potential safeguarding implications.

9. UNTRUE OR MALICIOUS ALLEGATIONS

If an individual raises a concern in good faith, no action will be taken against them if the concern is not substantiated following investigation.

However, where an allegation is found to have been made maliciously, knowingly falsely or for personal gain, disciplinary action may be taken.

10. HOW TO MAKE A DISCLOSURE

Concerns should normally be raised with:

1. Your Line Manager

2. The Whistleblowing Officer (Deputy Headteacher)
3. The Headteacher
4. The Chair of Trustees

Where the concern involves any of the above individuals, the concern should be reported to the next appropriate level.

Concerns may be raised:

- In writing
- By email
- Verbally
- Through a meeting request

You should provide as much information as possible including:

- The nature of the concern
- Relevant dates
- Individuals involved
- Any supporting evidence
- Why you believe the matter is of concern

You are not expected to prove the allegation but should have reasonable grounds for raising it.

Trade union representatives or professional associations may support individuals in making disclosures.

Safeguarding Concerns

Any concern relating to the welfare or safety of a child must also be reported in accordance with the Academy's Child Protection and Safeguarding Policy.

Safeguarding concerns will be treated as a priority and may be referred immediately to relevant safeguarding agencies, the Local Authority, Police or the Designated Safeguarding Lead.

11. HOW THE ACADEMY WILL RESPOND

The action taken will depend on the nature of the concern.

Matters raised may:

- Be investigated internally.
- Be referred to external agencies.
- Be referred under safeguarding procedures.
- Be referred to the Police.
- Be referred to external auditors or regulators.
- Be resolved through management action.

An initial assessment will determine the most appropriate course of action.

Timescales

The Academy will normally:

Within 10 Working Days

- Acknowledge receipt of the concern.
- Confirm whether further enquiries are required.
- Explain the next steps.

During the Investigation

Where appropriate, the whistleblower will receive updates on progress.

Following the Investigation

The Academy will provide feedback wherever legally possible, while respecting confidentiality and data protection requirements.

The amount of contact will depend upon:

- The nature of the concern.
- The complexity of the investigation.
- Legal or safeguarding considerations.

When meetings are arranged, individuals may be accompanied by:

- A trade union representative
- A workplace colleague
- A professional association representative

provided there is no conflict of interest.

12. INDEPENDENT ADVICE

If you are uncertain whether a concern should be raised under this policy, advice can be obtained from:

- Your Trade Union
- Your Professional Association
- Protect, the independent whistleblowing charity

Website: Protect Advice Service

13. EXTERNAL DISCLOSURE

The Academy hopes concerns can be resolved internally.

However, disclosures may be made externally where appropriate.

Individuals may contact:

- A prescribed person or body
- The Police
- Ofsted

- The Education and Skills Funding Agency (ESFA)
- The Local Authority
- The Health and Safety Executive (HSE)
- A solicitor

Guidance can be found at:

https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2

Safeguarding Whistleblowing

The NSPCC Whistleblowing Helpline provides an alternative route for reporting concerns about child protection or safeguarding failures where staff do not feel able to raise concerns internally.

Telephone: 0800 028 0285

Email: help@nspcc.org.uk

Individuals should consider external disclosure where they reasonably believe:

- The concern may be covered up.
- They may suffer unfair treatment.
- Appropriate action has not been taken after concerns have been raised internally.
- There is an immediate safeguarding or safety risk.

14. RECORD KEEPING AND DATA PROTECTION

The Academy will maintain confidential records of all whistleblowing concerns raised.

Records will:

- Be held securely.
- Be accessible only to authorised individuals.
- Be retained in accordance with the Academy's Data Protection Policy and Records Retention Schedule.
- Comply with UK GDPR and Data Protection legislation.

The Whistleblowing Officer will maintain an anonymised register of concerns raised and outcomes achieved for monitoring and governance purposes.

Monitoring and Review

The Board of Trustees will review this policy annually or sooner if required by changes in legislation, guidance or organisational need.

The effectiveness of the policy will be monitored through:

- Number of concerns raised.
- Nature of concerns.
- Outcomes achieved.
- Feedback from staff.

- Lessons learned from investigations.