



## Whistleblowing Policy and Procedure Version 2.7

<p><b>Important:</b> This document can only be considered valid when viewed on the Trust website. If this document has been printed or saved to another location, you must check that the version number on your copy matches that of the document online.</p> <p><b>Name and Title of Author:</b></p>	<p>Emma Collins, Director of People and HR</p>
<p><b>Name of Responsible Committee/Individual:</b></p>	<p>Resources and Finance Committee</p>
<p><b>Implementation Date:</b></p>	<p>Summer Term 2025</p>
<p><b>Review Date:</b></p>	<p>Summer Term 2027</p>
<p><b>Target Audience:</b></p>	<p>Employees, workers, trainees, and agency workers</p>
<p><b>Related Documents:</b> All Trust policies and procedures referred to are located on the trust website, <a href="http://www.theeducationalliance.org.uk">www.theeducationalliance.org.uk</a>. If English is not your first language, and you require assistance/translation, please contact the HR Department. This policy has been equality impact assessed.</p>	<p>Public Interest Disclosure Act 1998 Expectations and Code of Conduct Trust and school Child Protection Policies Low Level Concerns Policy Grievance Procedure Academy Trust Handbook Health and Safety Policy Fraud Policy Disciplinary Policy and Procedure</p>

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## POLICY STATEMENT

We are here to make great schools and happier, stronger communities so that people have better lives.

We do this by advancing high-quality inclusive education that values all young people equally, through:

- Ensuring all schools in the TEAL family are successful and all our young people thrive.
- Developing the next generation of great teachers and leaders.
- Connecting with civic leaders and influencing the system so that it becomes fairer and more inclusive, sustainable and ethical.

We will always:

- Do what is right.
- Stand shoulder to shoulder.
- Focus on quality in everything we do.

The trust is fully committed to an ethos of openness, accountability and transparency, where employees are encouraged to voice any concerns they have in a professional, responsible way. All individuals are therefore encouraged to raise any concerns they may have, and this policy details the way in which individuals may raise concerns.

### 1. SCOPE

This policy applies to employees, workers, agency workers, and trainees. Issues relating to an employee's own pay or working hours, working conditions or volume of work do not fall within the scope of this policy where they are purely personal grievances, and should be addressed via other policies and procedures (e.g. the trust's Grievance Procedure).

### 2. ROLES AND RESPONSIBILITIES

The **Resources and Finance Committee** is responsible for approving this policy, monitoring its effectiveness and ensuring it is published on the trust's website. Trustees must also appoint at least one Trustee and one member of staff who other staff can contact to report concerns.

The **CEO** is responsible for ensuring that staff and others do not suffer a detriment in the application of this policy and procedure. The CEO will also ensure that:

- Any individual who makes a disclosure of wrongdoing or malpractice in good faith is protected against victimisation.
- Anyone who victimises a whistleblower will be subject to the trust's Disciplinary Policy and Procedure.
- Any matters raised will be treated seriously, swiftly, consistently, fairly and professionally.
- Any matter raised will be promptly and thoroughly investigated by an appropriate senior person.
- The whistleblower's identity will, so far as is possible, remain confidential.
- Any employee or worker who knowingly makes false allegations against a colleague will be subject to the trust's Disciplinary Policy and Procedure.
- Any employee who, in good faith, makes allegations that turn out to be unfounded will not be penalised for being genuinely mistaken.

The **Human Resources Department** is responsible for ensuring that all employees and officers of the trust are aware of this policy. The team will also ensure that:

- the policy is implemented fairly and consistently.
- staff know what protection is available to them if they report areas of malpractice or wrongdoing, and who to approach to report a concern.
- whistleblowers are treated with dignity and respect and offered access to appropriate support.
- whistleblowers are encouraged to access additional support via their trade unions and the employee assistance programme.

**Leaders and managers** must ensure they deal with whistleblowing issues swiftly, respectfully, thoroughly and professionally, whilst upholding confidentiality as far as possible. They must take all reasonable steps to ensure that individuals who raise a whistleblowing concern do not suffer detrimental treatment.

All **employees and officers of the trust** have a responsibility for raising any concerns they have, thus providing the trust with the opportunity to resolve any issues that arise. It is expected that wherever possible employees and officers of the trust raise concerns prior to malpractice or wrongdoing occurring. However, where this isn't possible, it is expected that employees and officers of the trust raise concerns at the earliest opportunity in line with this policy and procedure.

### **3. EQUALITY, DIVERSITY AND INCLUSION**

The Education Alliance is committed to:

- Promoting equality and diversity in its policies, procedures and guidelines
- Delivering high quality teaching and services that meet the diverse needs of its student population and its workforce, ensuring that no individual or group is disadvantaged

This policy applies to all in scope regardless of any protected characteristics.

### **4. PRINCIPLES**

Everyone should ensure they have an awareness and understanding of the importance of preventing and eliminating wrongdoing at work. Employees and officers of the trust should be mindful of the potential for illegal or unethical conduct and report anything of that nature. Any matter raised under the procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation will be shared with the worker who raised the issue.

Whistleblowing is the action someone takes to report wrongdoing at work that affects others, e.g. the general public. The law provides protection for workers who raise legitimate concerns about specified matters and these matters are called qualifying disclosures. A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that:

- a criminal offence;
- failure to comply with a legal obligation;
- a miscarriage of justice;
- endangering of someone's health and safety;
- damage to the environment; or;
- concealment of any of the above;

is being, has been, or is likely to be, committed. In education, qualifying disclosures may include safeguarding concerns, and it is crucial that the trust fosters a culture to encourage concerns to be raised, and that individuals are assured that they will be protected and their concerns will be treated seriously. Complaints of sexual harassment of an employee or worker will also be treated as a protected disclosure. It is not necessary for the worker to have proof that such an act is being, has been, or is likely to be, committed – a reasonable belief is sufficient. The worker has no responsibility for investigating the matter, as it is the organisation's responsibility to ensure that an investigation takes place.

No worker will be victimised for whistleblowing. This means that the continued employment and opportunities for future promotion or learning and development of the worker will not be prejudiced because they have raised a legitimate concern.

It is important that we protect whistleblowers and that we also ensure this policy is not misused. The following are examples of actions that would be considered disciplinary offences:

- Victimisation of a worker for whistleblowing.
- Maliciously making a false allegation.
- An instruction to cover up a potential wrongdoing. If told not to raise or pursue a concern, even by a person in authority such as a manager, workers must not agree to remain silent and should escalate the issue to either a more senior manager or the Human Resources Department, or via one of the routes set out in section 6 below.

## 5. SAFEGUARDING

In line with Keeping Children Safe in Education (KCSiE), all workers **must** act on any concerns or information that gives them concern about the safety and wellbeing of a child or children arising from circumstances or events in or outside of school. Safeguarding concerns may relate to the conduct or behaviour of a worker towards an individual child or children; information that suggests a worker is unsuitable to work with children, or belief that the senior leadership team, the Trust Board, or a Local Governing Body (LGB) has failed to take appropriate action in response to a safeguarding concern raised.

Such a concern in a safeguarding context may be related to:

- the conduct or behaviour of a member of staff or volunteer towards an individual child or children.
- information that suggests a member of staff or volunteer is unsuitable to work with children.
- belief that the Designated Safeguarding Lead (DSL), senior leaders or governors have failed to take appropriate action in response to safeguarding concerns raised.

The trust's Low Level Concerns and Child Protection policies detail the ways in which people can raise safeguarding concerns in our trust, and this policy should be read as an additional measure to enable staff to raise their concerns. All concerns will be treated with the strictest confidence by all concerned. The trust will protect the identity of whistleblowers as much as possible; however, it may not always be possible to do so. All staff involved in any related investigations must maintain confidentiality during and after its conclusion.

## 6. WHISTLEBLOWING ROUTES

### 6.1 INTERNAL ROUTE

In the first instance, employees should raise concerns with their Headteacher/Director/equivalent. The Headteacher or another appropriate senior leader may undertake a preliminary investigation, which may be sufficient to determine a response and resolution. In many cases, a more thorough investigation may follow, as appropriate. This will include an interview and statement from the individual who raised the issue(s) and potentially other witness statements alongside the collation of any relevant evidence. The manager investigating the issue will report the findings of their investigation to either their Headteacher, the Director of People and HR, or the Deputy CEO. Serious cases may result in the issue being escalated to the CEO, Chair of the Board and/or any appropriate government department or regulatory agency.

Where the individual reasonably believes their Headteacher/Director/equivalent to be involved in the issue, or if for any other reason they do not wish to approach this individual, any concerns can be first raised with:

- the Human Resources Team
- a member of the trust Senior Leadership Team
- another Headteacher
- Director of People and HR
- Deputy CEO
- CEO
- Chair of the Trust Board.

If disciplinary action is required, the manager investigating the issue will investigate the matter with assistance from the Human Resources Team in line with the trust Disciplinary policy and the Scheme of Delegation.

On conclusion of an investigation, the individual who raised the concern will be advised of the outcome of the investigation (including the actions that the trust has either taken or intends to take). If no further action is to be taken, the rationale for this decision will be shared with the individual.

## **6.2 EXTERNAL ROUTE**

If the individual reasonably believes that appropriate action has not been taken by the trust, they should report the matter to the proper authority (a prescribed person or body). Alternatively, the individual may choose to make a disclosure directly to prescribed people or bodies in the first instance. The legislation sets out the prescribed people or bodies to which qualifying disclosures may be made, including:

- HM Revenue and Customs
- Financial Conduct Authority
- Competition and Markets Authority
- Health and Safety Executive
- Environment Agency
- Independent Office for Police Conduct
- Serious Fraud Office

Whistleblowers can also make a disclosure to Ofsted by telephone (0300 123 3155), via email ([whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk)) or in writing to: WBHL, Ofsted Piccadilly Gate Store Street

Manchester M1 2WD. The Department for Education is also a prescribed body for whistleblowing in education.

The [NSPCC Whistleblowing Advice Line](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – and the line is available from 08:00 to 20:00 Monday to Friday, and 09:00 to 18:00 at weekends. The email address is [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

A full list of prescribed people and bodies can be found on the Gov website: [Whistleblowing: list of prescribed people and bodies - GOV.UK](#)

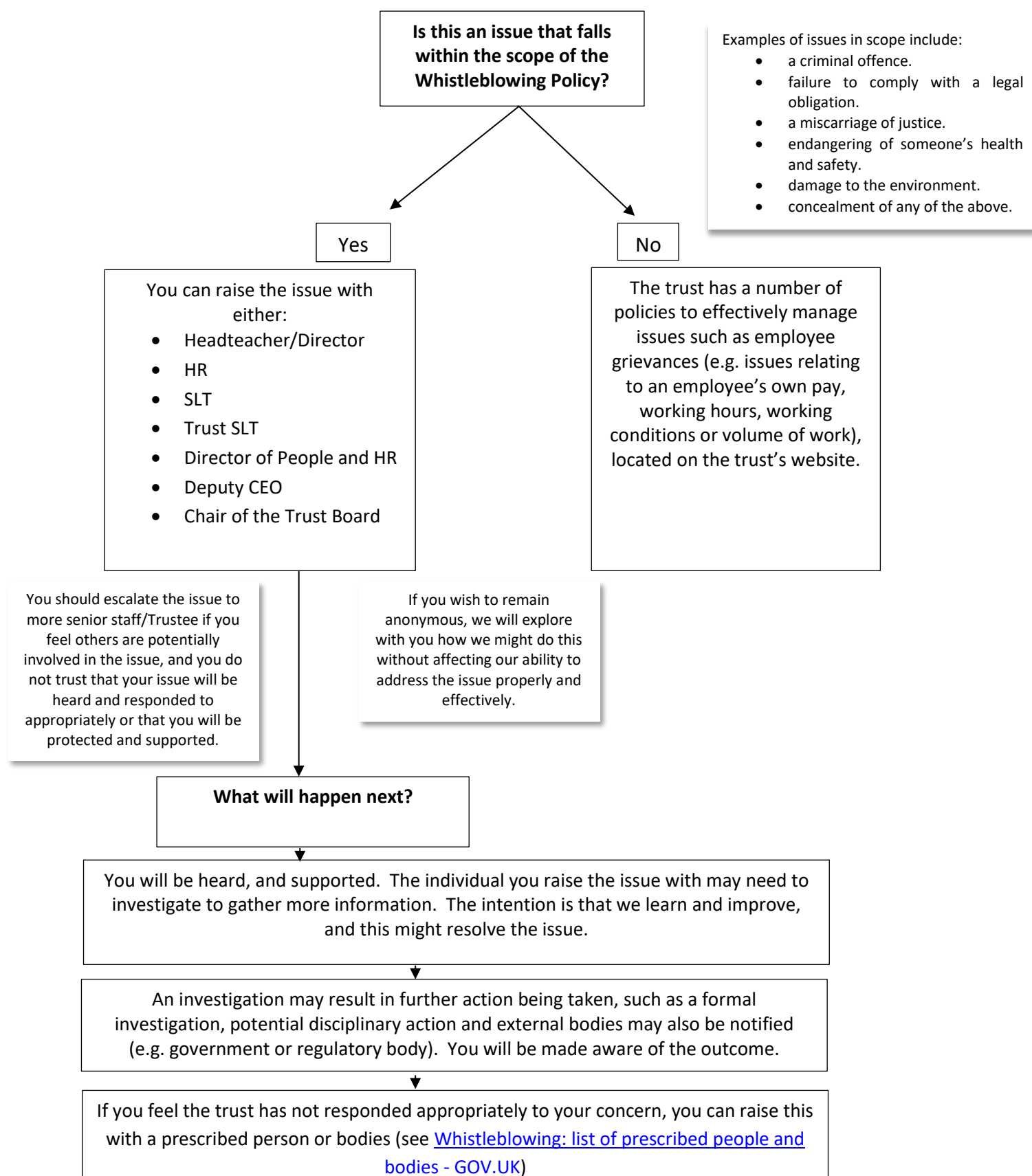
## **7. MONITORING COMPLIANCE WITH AND EFFECTIVENESS OF THE POLICY AND PROCEDURE**

Effectiveness and compliance of this policy will be monitored via the reporting and auditing of case resolution as issues arise.

## **8. REVIEW**

This policy will be reviewed within two years of the date of implementation with recognised trade unions via the JCNC.

## Whistleblowing Flowchart





**SUMMARY OF POLICY CHANGES**

Summer Term 2025

- Clarity for the reader in understanding the process for raising whistleblowing concerns
- Roles and responsibilities of those managing a whistleblowing concern clarified
- Small changes to the definition of 'protected disclosure' in line with legislation
- Signposting to prescribed people and bodies list via Gov.UK