POLICY

For

Whistleblowing

Amended

September 2016	**September 2019**	**September 2022**	**September 2024**	**Dec 2025 (role changes)**
September 2017	**September 2020**	**September 2023**	**March 2025 (name changes)**	
September 2018	**September 2021**	**April 2024 (job title changes)**	**September 2025**	

Striving for excellence, caring for all
Within a loving and caring Christian environment.

Introduction

'Let all that you do be done in love.' 1 Corinthians 16:14

Our Vision
We are a community in which everyone is offered the opportunity to fulfil their full potential, to understand themselves and be valued for who they are. Through a stimulating and challenging learning environment, we pursue academic excellence and seek the flourishing of all. This is because we know we are all God's children.

"Do all the good you can, by all the means you can, in all the ways you can, in all the places you can, at all the times you can, to all the people you can, as long as you ever can."

John Wesley

The CEO, Executive Headteacher, Heads of School, Trustees and Governors recognise that a member of staff may be the first to realise if something is wrong within a school which is part of Abbey Academies Trust (AAT). However, staff may not want to express their concerns because they feel that speaking up would somehow be disloyal to their colleagues or to AAT.

It is important for staff to know that AAT is committed to the highest possible standards of openness, probity and accountability. Part of meeting that commitment is for the management of our Academy Trust, Trustees and Governors, to encourage employees and others with concerns about any aspect of the Academy Trust's work to feel able to come forward and voice those concerns. AAT should recognise the need for confidentiality and the fact that the majority of cases will have to proceed on a confidential basis.

SCOPE OF THIS POLICY

Aims of the Policy
The policy is designed to ensure that staff can raise their concerns about wrongdoing or malpractice within a school which is part of Abbey Academies Trust (AAT) without fear of victimisation, subsequent discrimination or disadvantage. It is also intended to encourage and enable them to raise serious concerns within the school rather than ignoring a problem or 'blowing the whistle' outside.

This policy aims to:

- encourage staff to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice
- provide avenues for them to raise those concerns and receive feedback on any action taken
- ensure that they receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied
- reassure them that they will be protected from possible reprisals or victimisation if they have made any disclosure in good faith.

Range of the Policy
The policy is intended to enable those who have concerns regarding wrongdoing or malpractice to report those concerns at the earliest possible opportunity so that they can be properly investigated. The policy is not, however, intended to replace existing procedures, for example:

- if the concern relates to someone's own treatment as a member of staff, they should raise this under the existing grievance or harassment procedure, as appropriate
- if a parent/carer or other user of the school has a concern about services provided, they should raise this as a complaint following the Trust's Complaints Procedure
- some areas of service have their own specific procedures, e.g. Child Protection procedures

Where concerns are raised, the subsequent investigation may take the form of any appropriate procedure, either internal or external, e.g. an internal audit enquiry or a Police investigation.

The person who has raised the concerns should ordinarily be kept informed of progress and of the outcome of any investigation.

If a concern is raised about a supply teacher the Trust will take the lead in any investigation because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have the relevant information required by the LADO as part of the referral process. (KCSIE September 2025)

Who can raise a concern under this Policy?
The provisions of the policy apply to all:

- employees of the Academy Trust
- trustees and governors of the Academy Trust
- employees of contractors working for the Trust e.g. agency staff
- employees of suppliers
- voluntary workers within the Trust

What should be reported?
Staff should report any concerns that they have about service provision or about the conduct of employees or trustees and governors of the Trust or others acting on behalf of AAT that:

- make them feel uncomfortable in terms of known standards, or
- are not in keeping with the Trust's regulations and policies, or
- fall below established standards of practice, or
- are improper behaviour

These concerns might relate to:

- conduct which is an offence or a breach of the law
- a breach of our Code of Conduct
- disclosures related to miscarriages of justice
- racial, sexual, disability or other discrimination
- health and safety of the public and/or other employees
- damage to the environment
- unauthorised use of public/Trust funds
- possible fraud and corruption
- neglect or abuse of pupils, or
- other unethical or improper conduct
- behaviour outside of school that indicates they may not be suitable to work with children ('transferable risk') (KSCIE September 2024)

The issue of concern could threaten:

- colleagues
- pupils
- the success and reputation of the Trust or school

SAFEGUARDS

The Legal Framework
The Public Interest Disclosure Act 1998 provides legal protection, in certain circumstances, to workers making disclosures in good faith about malpractice.

The Act makes it unlawful for an employer to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act.

Harassment or Victimisation
Adopting the whistleblowing policy is an acknowledgement by the CEO, Executive Headteacher, Trustees, Governors and management of the Trust that AAT is committed to good practice, high standards and is supportive of its staff.

It should be made clear to staff that AAT recognises that the decision to report a concern can be a difficult one to make. If a member of staff honestly and reasonably believes what they are saying is true, they should be reassured they have nothing to fear because they will be doing their duty to the school, their colleagues and those for whom they are providing a service.

It should also be made clear that AAT will not tolerate any harassment or victimisation (including any informal pressures) and will take the appropriate action to protect staff when they raise a concern in good faith.

Support for the Person Raising Concerns
Throughout the process the member of staff should be assured that:

- they will be given full support from the management, trustees and governors of the Trust
- their concerns should be taken seriously
- AAT will do all it can to help them throughout the investigation e.g. provide access to advocacy services where the individual has no access to Trade Union Support

A request for redeployment will not be unreasonably refused, and where refused, reasons will be given.

Confidentiality
All concerns must be treated in confidence and every effort should be made not to reveal the identity of the member of staff who raises concerns, should that be their wish.

If disciplinary or other proceedings are to follow an investigation, it may be that it is not possible to take the appropriate action on the disclosure without the help of the person raising the concerns. As a result, they may be asked to come forward to act as a witness. If they agree to this, they should be offered the appropriate advice and support.

Anonymous Allegations
AAT encourages staff to put their name to their allegation whenever possible. Concerns expressed anonymously are much less powerful, but they should be considered at the discretion of the school. In exercising this discretion, the factors to be taken into account would include:

- the seriousness of the issue raised
- the credibility of the concern
- the likelihood of confirming the allegation from other sources
- evidence base

Untrue Allegations
Some concerns raised may, when investigated, prove to be groundless. If a concern is raised or an allegation made in good faith by someone reasonably believing it to be true and their concerns are not confirmed by investigation, the member of staff should have nothing to fear as the school should recognise their genuine motives. However, it needs to be stated in this AAT policy, that should someone make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against them.

RAISING A CONCERN

Who should a concern be raised with?

Staff must report low-level concerns to the Head of School (Bourne Abbey), or Executive Headteacher (Bourne Elsea Park/Colsterworth). In the event of there being concerns about the Head of School (Bourne Abbey) or the Executive Headteacher (Bourne Elsea Park/Colsterworth) the concerns must be reported to the CEO. All high-level concerns should be reported to the CEO.

In the event of there being any concerns about the CEO the concerns must be reported to the Chair of Trustees.

If an individual is unsure whether or how to raise a concern or wants confidential advice, they may wish to consult their Trade Union. Alternatively, they can contact the independent charity Protect on 020 3117 2520 or via the contact form on their website https://protect-advice.org.uk/contact-protect-advice-line/. Their lawyers can give individuals free confidential advice on how to raise a concern about serious malpractice at work. It is possible for employers to register for assistance with Protect, for a fee. For additional information on Protect and how it might help you, please visit https://protect-advice.org.uk/

How to raise concern(s)

We encourage you initially to raise your concern internally. This allows us the opportunity to right the wrong and give an explanation for the behaviour or activity. We also advise staff to report any allegation. We recognise that your first actions will depend upon the seriousness and sensitivity of the issues and who you believe to be involved. We advise that you make it clear that you are raising your concerns under our whistleblowing arrangements. This will help managers respond in line with this policy.

Staff may raise their concern by telephone, in person or in writing. In the interests of confidentiality, staff may also raise concerns via their Trade Union. The earlier they express their concern, the easier it is to take action. They will need to provide the following information:

- the background and history of the concern (where possible giving relevant dates; names; places and copies of any documents)
- the reason why they are particularly concerned about the situation

Although they are not expected to prove beyond doubt the truth of their suspicion, they will need to demonstrate to the person contacted that there are reasonable grounds for their concern.

They may invite their Trade Union, professional association representative or a friend to be present during any meeting or interviews in connection with the concerns they have raised.

HOW THE TRUST SHOULD RESPOND

The Trust should take their concerns seriously and respond to them.

In order to be fair to all employees, including those who may have been wrongly or mistakenly accused, initial enquiries should be made to decide whether an investigation is appropriate and, if so what form that investigation should take.

Where concerns or allegations fall within the scope of specific Trust procedures, then they would normally be referred for consideration under those procedures.

As a result of this, where appropriate, the concerns raised may:

- be investigated by management, internal audit or through the discipline/grievance/harassment process
- be referred to the external auditors
- be referred and dealt with under the established child protection procedures
- form the subject of an independent inquiry

Within ten working days of the concern being raised, the CEO, Executive Headteacher or Head of School (or Chair of Trustees if internally raised with him) should write to the person raising the concern:

- acknowledging that their concern has been received
- indicating how the Trust proposes to deal with the issue
- telling them whether any further investigations will take place (and if not, explaining why this is the case)
- supplying them with information on staff support mechanisms

The amount of contact between the person raising the concern and those considering the issues will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. It is likely that the person raising concern will be interviewed to ensure that their disclosure is fully understood.

A meeting should be arranged away from the workplace, if they wish, and a union or professional association representative or a friend may accompany them in support.

The Trust should do what it can to minimise any difficulties that staff may experience as a result of raising a concern. For instance, if they are asked to give evidence in criminal or disciplinary proceedings, the Trust should arrange for them to receive appropriate advice and support.

They need to be assured that their disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, they should be kept informed of the progress and outcome of any investigation.

The CEO acts as the Response Officer and has overall responsibility for the maintenance and operation of this policy. They should maintain a record of concerns raised and the outcomes. Records must be kept in such a way so as not to endanger the confidentiality concerning the identity of the person raising concerns.

The CEO should report to the Board of Trustees and Local Governing Body as necessary.

Where the issue directly involves the CEO, the Chair of Trustees should assume this responsibility or delegate it as appropriate.

Our response will depend on the nature of the concern raised and may be:

- advice only
- resolved by agreed action without the need for investigation
- investigated internally (by Senior Leaders, Trustees or Governors, or other independent investigators)
- referred to the relevant safeguarding team
- referred to the Police if a criminal matter
- referred to the external auditor
- the subject of an independent inquiry
- refer to the LADO

We may carry out initial enquiries in order to protect individuals or employees and those accused of wrongdoing. We will use the results of these enquiries to decide whether an investigation is needed and if so, what form it should take. If urgent action is required, this will be taken before we start any investigation.

The Response Officer will follow up concerns of fraud, bribery or corruption. The Response Officer will determine whether:

- we should refer the concern to the Police directly or
- advise the complainant to make such a referral

If the Response Officer decides that we should refer the matter to the Police, we will seek advice from the Police to establish:

- if a simultaneous internal investigation can be conducted
- whether or not they consent for the subject of the complaint to be informed of allegations

Our code of conduct requires any member of staff, trustee or governor who during the course of their employment or duties with the school faces criminal charges or who receives a new caution or conviction, to inform the CEO, Executive Headteacher or Head of School immediately, or, in the case of the CEO, the Chair of Trustees.

We will acknowledge your whistleblowing disclosure within 5 working days. Within the next 10 working days we will explain in writing how we propose to deal with the matter. The whistleblower will be:

- given an estimate of how long it will take to provide a final response
- told if initial enquiries have been made
- told if further investigation is required, and if not, why not (where appropriate)
- given details of support mechanisms
- advised of the investigating officer (where appropriate)
- advised how we will inform you of progress

The amount of contact between you and the officer considering your whistleblowing disclosure will depend on the nature of the concerns raised. For example, if further investigation is required, the investigator may need to seek additional information from you.

If a meeting is necessary, this can be held off site if you prefer. If you are an employee, you will have a right to be accompanied by a union representative or work colleague (not involved in the area where the concern exists). If you are not an employee, you may wish to bring someone with you. A neutral venue can be arranged, where required.

We will help with any difficulties you may experience as a result of raising a concern. We will, for example, provide advice if you are required to give evidence for criminal or disciplinary proceedings. Sometimes whistleblowers have counter-allegations made against them. We have a duty to investigate any concerns that we receive and that will apply in these circumstances. However, this will not detract from the principles, as set out in this policy, which govern how we will respond to whistleblowers. The over-riding objective will be to establish the truth.

We will retain records of all work carried out and actions taken to address the concerns raised by the whistleblower. This will include the investigator's case file, where relevant. We will hold all files securely and confidentially.

At the end of our investigations, we will provide feedback to the whistleblower (if known) on actions taken and limited detail on the outcome of investigations. Feedback will be subject to legal constraints. However, we recognise the importance of providing you with assurances that the matter has been dealt with properly.

HOW THE MATTER CAN BE TAKEN FURTHER

The aim of the policy is to provide staff with an appropriate way to raise their concern and hopefully, they will be satisfied with any action taken as a result of their raising issues. However, should this not be the case and they feel it necessary to take the matter outside the Trust, possible contacts are:

- the External Auditor
- the relevant Trade Union
- the Police (relevant professional bodies or regulatory organisation)
- Local Citizen Advice Bureau
- A solicitor
- The district auditor
- County councillor/local MP
- Local government ombudsman
- Protect

This does not prevent staff from seeking their own legal advice.

We will always listen to any concerns and try to resolve them but should staff feel unable to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled in the school, other channels are open to them:

- NSPCC whistleblowing advice line is available. Staff can call 0800 0280285 – 08:00 to 20:00, Monday to Friday and 09:00 to 18:00 at weekends. The email address is: help@nspcc.org.uk. Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH
- Ofsted provides guidance on how to make complaints about a childcare provider: Complaints procedure - Ofsted - GOV.UK (www.gov.uk)
- General guidance on whistleblowing can be found via: General guidance on whistleblowing can be found via: https://www.gov.uk/whistleblowing

If the member of staff raises their concerns outside the school, they should ensure that it is to one of the above prescribed contacts. A public disclosure to anyone else could take them outside the protection of the Public Interest Disclosure Act and of this policy.

They should not disclose information that is confidential to the school or Trust or to anyone else, such as a client or contractor of the Trust except to those included in the list of prescribed contacts.

REVIEW OF POLICY

It is recommended that the Trust should also monitor the policy every 12 months.

In the meantime, should any member of staff suggest any addition/revision to the policy, the CEO may wish to consider their suggestions and if necessary, put them forward at the time of the overall review.

The Local Education Authority will continue to review the issues surrounding confidential Reporting/Whistleblowing and issue any revised advice to schools and academies where necessary. As part of this process, views may be sought from employees and relevant Trade Unions, with regard to how effectively the policy has operated and whether any further revision is needed.

Policy reviewed: December 2025
Next review due: September 2026