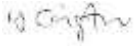




Victoria Academies Trust

WHISTLEBLOWING POLICY v3.0

Date of last review	October 2026	Review Period	2 years
Date of Next Review	October 2028	AC or Board Approved	Board
Type of Policy	Trust	Signed (chair)	

1. Policy Introduction

The Trust is committed to conducting its business with honesty and integrity, and expects all staff to maintain high standards in accordance with their contractual obligations and the Trust / Academy policy and procedure.

However, all organisations face the risk of things going wrong from time to time, or unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

This procedure is not a substitute for normal line management processes but an addition to them.

This procedure should only be used where all other existing internal procedures are felt to be inappropriate or when a member of staff, for whatever reason, feels inhibited in going through the normal line management

The requirement to have clear whistle-blowing procedures in place is set out in the Academy Trust Handbook. Keeping Children Safe in Education (KCSIE) also sets out expectations for schools to have appropriate whistle-blowing procedures.

2. Aims of Policy

The aims of this policy are:

- to encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate; and that their confidentiality will be respected;
- to provide staff with guidance as to how to raise those concerns; and
- to reassure staff that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work.

This policy does not form part of an employee's contract of employment and is not intended to have contractual effect. It is provided for guidance to all members of staff at the Academy / Trust and the Academy / Trust reserves the right to amend its content at any time.

This Policy reflects the Trusts current practices and applies to all individuals working at all levels of the organisation, including the Trustees, Academy Councillors, Headteacher, members of the Trust Central and Executive Team, employees, consultants, contractors, trainees, part-time and fixed-term workers, casual and agency staff (collectively referred to as "Staff" in this policy) who are advised to familiarise themselves with its content.

3. What is whistleblowing?

Whistleblowing covers concerns made that report wrongdoing or dangers at work that is "in the public interest". Examples of whistleblowing include (but not limited to)

- criminal offences, such a fraud or corruption;
- Pupils' or staff health and safety being put in danger

- Poor or unsafe safeguarding practice in the trust or its schools, including potential failures in provision as well as the failure to act on concerns about a child or the behaviour of an adult
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures (such a failure to follow internal rules or policies), including improper use of public funds
- Sexual harassment
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Risk or damage to the environment

A 'whistleblower' is a person who raises a genuine concern in good faith relating to any of the above. These genuine concerns relating to suspected wrongdoing or danger affecting any of the trust activities should be reported under this policy.

Not all concerns about the trust, or individual schools in the trust, count as whistleblowing. For example, personal staff grievances, such as bullying or general harassment do not usually count as whistleblowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance.

If a complaint involves personal circumstances alongside wider concerns regarding one of the areas set out above (e.g. pupil health and safety), the staff member must consult with Head of HR to decide the most appropriate reporting procedure.

When staff have a concern, they should consider whether it would be better to follow our staff grievance or complaints procedures.

Safeguarding concerns or allegations about the behaviour of staff that do not meet the harm threshold ('low-level concerns') should be reported in line with the trust's low-level concerns policy. Where concerns indicate a pattern of behaviour or a culture of unsafe practice, they may be addressed under this whistleblowing policy

4. Raising a whistleblowing concern

The Trust hopes that in many cases staff will be able to raise any concerns with their Line Manager, speaking to them in person or putting the matter in writing if they prefer. They may be able to agree a way of resolving the concern quickly and effectively. In some cases, they may refer the matter to the Academy Council or the Trust Board.

However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer to raise it with them for any reason, you should contact one of the following; the Headteacher or the Trustee with responsibility for whistleblowing matters

The Headteacher will arrange a meeting with the 'whistleblower' as soon as practicable to discuss their concern. They will record sufficient details to enable the matter to be thoroughly investigated. As a minimum the Headteacher will record the name of the employee but also indicate whether the individual wishes his or her identity to remain confidential, if possible, and the nature of the concern. In some cases, it will not be possible to maintain confidentiality and the Headteacher should explain this to the employee. In such instances the employee will have the choice of either withdrawing or agreeing to his/her identity becoming known to enable the concern to be effectively dealt with.

Staff may bring a colleague or trade union representative to any meetings under this policy who must respect the confidentiality of the disclosure and any subsequent investigation.

The Academy will take notes and produce a written summary of the concern raised and provide the 'whistleblower' with a copy as soon as practicable after the meeting. The Academy will also aim to give the 'whistleblower' an indication of how it proposes to deal with the matter.

Central team staff should report their concern to the CEO. If the concern is about the CEO or it is believed they may be involved in the wrongdoing in some way, the central team staff should report the concern to the appointed whistleblowing trustee.

5. Appointed Whistleblowing Trustee and Staff

Staff can also raise whistleblowing concerns to the appointed whistleblowing trustee – Shafiq Sharif (shafiqsharifsas@yahoo.co.uk) or the nominated members of Trust staff as per the details in section 4 above.

6. Investigating the concern

When a concern is received by the headteacher/CEO/trustee – referred to from here as the recipient – they will:

- Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative. The companion must respect the confidentiality of the disclosure and any subsequent investigation
- Get as much detail as possible about the concern at this meeting and record the information. The staff member will be provided with a copy of the written summary of the concern after the meeting
- If it becomes apparent that the concern is not of a whistleblowing nature, the recipient should handle the concern in line with the appropriate policy and/or procedure and inform the staff member accordingly
- Reiterate, at this meeting, that they are protected, by law, from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken.

Establish whether there is sufficient cause for concern to warrant a further investigation. If there is:

- The recipient should then arrange a further investigation into the matter. In some cases they may need to bring in an external, independent person to investigate whom has relevant experience of investigations or specialist knowledge of the subject matter.
- The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps. The person who raised the concern may also be required to attend additional meetings in order to provide further information.

Within 5 working days- excluding periods of school closure – of a concern being referred to the headteacher, CEO, trustee, they will write to the complainant to:

- Acknowledge that the concern has been received
- Indicate how the matter is to be dealt with
- Give an estimate how long it will take to provide a final response, informing the complainant as to whether any initial enquiries have been made
- Tell the staff member whether further investigations will take place or not, why not where able. Sometimes, there may be a need for confidentiality that may prevent the trust giving the staff

member specific details of the investigation, an outcome or any disciplinary action taken as a result. In any event, any information about the investigation must be treated as confidential.

Throughout any investigation, the trust will provide wellbeing check-ins for both the complainant and the subject of concern.

Where the concern relates to safeguarding, the relevant DSL will be informed and involved in decision making where suitable, and appropriate referrals to external agencies will be considered.

6.1. Outcome of the investigation

Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether any wrongdoing has occurred.

The report will include any recommendations and details on how the matter can be rectified and whether or not a referral is required to an external organisation, such as the local authority (LA) or police.

They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.

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.

While we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

If a staff member is not satisfied with the way in which their concern has been handled, they can raise their concerns with the whistleblowing Trustee.

6. Confidentiality

The Trust hopes that Staff will feel able to voice whistleblowing concerns openly under this policy. However, if a member of staff wants to raise his or her concern confidentially, the Trust will endeavour to keep his or her identity secret in so far as it is possible to do so when following this policy and procedure. If it is necessary for anyone investigating that member of staff's concern to know the 'whistleblower's' identity, the Trust will discuss this with the member of staff first.

The Trust does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if the Trust cannot obtain further information. It is also more difficult to establish whether any allegations are credible and have been made in good faith. 'whistleblowers' who are concerned about possible reprisals if their identity is revealed should come forward to one of the contacts listed above and appropriate measures can then be taken to preserve confidentiality.

If an individual misuses the policy and procedure e.g. by making malicious or repeated unsubstantiated complaints against colleagues this could give rise to action under the Trusts Disciplinary Procedure. If the Headteacher knows or has a suspicion that an employee comes into this category, then s/he will take advice from the Designated Trustee who will help to determine what action should be taken.

The trust and the law recognise that in some circumstances staff may feel the need to report concerns to an external body such as a regulator. A list of prescribed bodies to whom staff can raise concerns with is included [here](#).

7. Concerns against Academy Councillors / Trustees

If a concern against an Academy Councilor or Trustee is received, then this will be treated in the same way as any other concern. It will receive the same serious consideration. The concern will be raised by the Headteacher/CEO with the Chair of Academy Council/Trustees who will decide how it should be dealt with.

If the concern is against the Chair of the Academy Council or Trust Chair, then clearly this process cannot be followed. In such circumstances, the concern will be taken directly to the Headteacher/CEO who will decide in consultation with the relevant member of ELT and the Governor with responsibility for Whistleblowing matters how it should be dealt with. In normal circumstances such a concern would be referred to the Department for Education for action.

8. External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases Staff should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for staff to report their concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. A list of prescribed bodies to whom staff can raise concerns with is included [here](#).

Whistleblowing concerns usually relate to the conduct of Academy/ Trust staff, but they may sometimes relate to the actions of a third party, such as a service provider. The law allows staff to raise a concern in good faith with a third party, where the member of staff reasonably believes it relates mainly to their actions or something that is legally their responsibility. However, Staff are encouraged to report such concerns internally first. Staff should contact one of the other individuals set out above for guidance.

Where concerns relate to safeguarding practice in the trust or any of its schools, staff may also consider contacting the local authority designated officer (LADO), children's social care directly, or the NSPCC whistle-blowing advice line on 0800 028 0285 or via email help@NSPCC.org.uk.

9. Protection and support for 'whistleblowers'

It is understandable that 'whistleblowers' are sometimes worried about possible repercussions. The Academy / Trust aims to encourage openness and will support Staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment would include dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a member of staff believes that he or she has suffered any

such treatment, he or she should inform the Headteacher immediately. If the matter is not remedied the member of staff should raise it formally using the Grievance Policy and Procedure.

Staff must not threaten or retaliate against 'whistleblower's in any way. Anyone involved in such conduct will be subject to disciplinary action.

All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Headteacher in the first instance.

