

PUBLIC INTEREST DISCLOSURE (WHISTLEBLOWING) POLICY

Summary

We want everyone in the Trust to feel confident raising concerns about wrongdoing. Whistleblowing protects colleagues who speak up in the public interest about issues such as fraud, corruption, safeguarding risks, health and safety concerns, criminal activity, environmental harm, or attempts to conceal wrongdoing. We take these concerns seriously and will investigate them sensitively, fairly and without detriment to the person raising the concern. This policy explains how concerns can be raised, the protection available and the Trust's approach to handling disclosures.



If you are unsure about the validity of the content of this policy please refer to the Policy Owner

Please Note: This policy is applicable to All Individuals working for or with the Group.

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Policy holder	Director of People
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Approved by

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Approval Committee	HRWC
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Version Control

Control No.	Change summary	Consultation Group	Effective date
V2	Full policy rewrite: Comprehensive rewrite to improve clarity, accessibility and governance alignment. The revised policy reflects current statutory guidance under the Public Interest Disclosure Act 1998, clarifies the scope of protected disclosures, strengthens protections from detriment, and sets out clear routes for raising concerns, including concerns relating to senior leaders, Trustees and Academy Committee members. Roles, responsibilities and escalation pathways have been updated, and language and structure aligned to EMAT's updated policy framework and values.	People Partners, ELT, HRWC	29/01/26

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1. Purpose

A protected disclosure may relate to a single incident or to a **pattern, practice or culture** that the individual reasonably believes represents wrongdoing, serious failure, risk or malpractice within the Trust. The concern does not need to be proven to be protected, provided it is raised in good faith and with a reasonable belief that it is in the public interest.

This policy enables colleagues to raise concerns about wrongdoing in the public interest and sets out how the Trust will respond. It supports a culture of openness, integrity and accountability and ensures compliance with the Public Interest Disclosure Act 1998 (PIDA) and The Employment Rights Act 2025.

2. Scope and Application

This policy applies to all colleagues working for or with the Trust, including:

- Employees
- Agency and supply workers
- Contractors and consultants
- Volunteers
- Trustees and Governors

Concerns relating solely to an individual's own employment situation (for example, conduct issues, bullying, performance, or contract terms) would normally be raised via the **Respect and Resolution (Grievance) Policy and Procedure**, unless they also meet the threshold for a protected disclosure.

3. Definitions

- **Public Interest Disclosure Act 1998 (PIDA):** The legislation protecting workers who make disclosures in the public interest.
- **Investigating Officer (IO):** A person appointed to investigate a concern impartially.
- **Detriment:** Any disadvantage, harm or unfair treatment because a concern was raised.
- **Confidential disclosure:** A disclosure where the Trust knows the individual's identity but agrees not to share it without consent unless legally required.

4. Roles, Responsibilities and Delegations

Members:

- Receive concerns only where the Chair of the Board is implicated; ensure independent oversight.

Trust Board:

- Holds ultimate accountability for whistleblowing governance; receives assurance reports; ensures Members are involved where required.

HR & Wellbeing Committee (HRWC):

- Provides delegated oversight; reviews of anonymised data; ensures improvements are implemented; monitors policy effectiveness.

Academy Committees:

- Promote a culture of openness; receive high-level assurance (not case details); escalate cultural or safeguarding concerns to the Principal or Director of Education.

Chief Executive Officer (CEO):

- Ensures consistent implementation of this policy; receives concerns from central colleagues; appoints appropriate Investigating Officers (IOs).

Director of People:

- Policy Owner; ensures communication, review and oversight; provides guidance; maintains records and reports anonymised data to HRWC.

Investigating Officer (IO):

- Conducts impartial, proportionate investigations; gathers evidence; maintains confidentiality; provides findings and recommendations.

All Colleagues:

- Raise concerns honestly and promptly; co-operate with investigations; maintain confidentiality.

5. Policy Statement

What is whistleblowing?

Whistleblowing involves raising a concern that the individual reasonably believes is made in the public interest and relates to one or more of the following categories set out in the Public Interest Disclosure Act 1998 (PIDA):

- A criminal offence
- A failure to comply with a legal obligation
- A miscarriage of justice
- Health and safety risk or danger
- Damage to the environment
- Financial irregularities, fraud or corruption
- Deliberate concealment of any wrongdoing listed above

You do not need proof, only a reasonable belief that the information you are sharing indicates wrongdoing may have occurred, is occurring, or is likely to occur.

Protection from detriment

Colleagues raising a protected disclosure are legally protected from:

- Dismissal
- Detriment (for example, unfair treatment, disadvantage, isolation or negative changes to work conditions)

This protection applies even if the concern is later found to be mistaken, provided it was raised in good faith and in the public interest.

We take victimisation of whistleblowers seriously and will act where it occurs.

Confidentiality

We will treat your concern sensitively and, where possible, confidentially. Confidentiality may not be possible where:

- A safeguarding referral is required
- There is a legal obligation to share information
- A statutory body (such as the Disclosure and Barring Service (DBS), the police or the Education and Skills Funding Agency (ESFA)) requires information

We will always explain these limitations to you at the earliest opportunity

6. Procedure

Raising a concern

You can raise a concern verbally or in writing through one of the following routes. Please include as much detail as possible (names, dates, locations, evidence, context).

You can raise concerns with:

- Academy staff: your Principal
- If concern relates to the Principal: School Improvement Director (SID) or Director of Education
- If the concern relates to an Academy Committee member: Principal → Director of Education → Chair of the Board (*depending on severity and need for independence*)
- Central team colleagues: Chief Executive Officer (CEO)
- If the concern relates to the CEO: Chair of the HR & Wellbeing Committee (HRWC)
- If the concern relates to a Trustee: Chair of the Board

- If the concern relates to the Chair of the Board: Members

You may be accompanied by a Trade Union (TU) representative or workplace colleague at any meeting.

Initial Response

The Trust will:

- Acknowledge the receipt of the concern and assess it promptly.
- **Determine appropriate next steps.**
- Arrange a meeting, normally within 10 working days.
- Clarify whether the concern is a potential whistleblowing matter.
- Explain confidentiality, protection from detriment and next steps.
- Decide whether to:
 - Take no further action
 - Redirect the matter to another procedure (for example, Safeguarding, Grievance)
 - Initiate an investigation

Investigation

If an investigation is required:

- An Investigating Officer (IO) will be appointed.
- The IO will create a proportionate investigation plan and gather evidence.
- Relevant individuals will be interviewed.
- Confidentiality will be maintained at all times.
- The colleague will be updated on indicative timescales.

Investigations will normally be completed within 20 school days, though complex cases may require more time.

Outcome

The Investigating Officer (IO) will issue a written report to the commissioning manager setting out:

- Whether wrongdoing occurred
- Evidence considered
- Recommended actions
- Whether external referrals (for example to the Disclosure and Barring Service (DBS), Education and Skills Funding Agency (ESFA) or police) are required

You will be informed of the outcome at an appropriate level of detail; **while it may not always be possible to share full details or outcomes, the Trust is committed to providing appropriate feedback wherever practicable.**

Procedural review

There is no appeal against the investigation outcome. However, you may request a review of whether the procedure was followed correctly by writing to the Lead Governance Professional who will convene a panel meeting of trustees to consider your objections within 10 school days of the outcome.

External Reporting

If you do not feel able to raise the concern internally, you may raise it externally with a prescribed person/body, including:

- Department for Education (DfE)
- Health and Safety Executive (HSE)
- Disclosure and Barring Service (DBS)
- OFSTED

A full list is available on GOV.UK (search: "List of prescribed persons for whistleblowing").

We encourage colleagues to seek advice from **Protect (Public Concern at Work)**, an independent whistleblowing charity.

Malicious or knowingly false concerns

Deliberately false or malicious concerns may lead to disciplinary action.

Concerns raised in good faith, even if mistake, will not.

7. Compliance and Monitoring

The Trust monitors compliance through:

- Annual anonymised reporting to the HR & Wellbeing Committee (HRWC)
- Internal audits
- Safeguarding and governance assurance processes

Detriment or victimisation of whistleblowers will be investigated and may result in disciplinary action.

8. Related Documents

- HR06 Respect & Resolution (Grievance) Policy and Procedure
- EMAT Complaints Procedure
- EMAT Safeguarding Policy
- HR08 Code of Conduct
- Education and Skills Funding Agency (ESFA) guidance
- Health and Safety Executive (HSE) guidance
- GOV.UK list of Prescribed Persons
- Protect (Public Concern at Work)

9. Appendices

- Appendix A - Whistleblowing Flowchart

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