

HUMAN RESOURCES: WHISTLEBLOWING POLICY

THIS POLICY WAS APPROVED	MARCH 2026
POLICY VERSION	FINAL
THIS POLICY WILL BE REVIEWED	JULY 2029
MEMBER OF STAFF WITH RESPONSIBILITY FOR REVIEW	HEAD OF HUMAN RESOURCES

1. Introduction

Wandle Learning Trust is committed to conducting its business with honesty and integrity.

This policy is intended to encourage and enable staff to raise concerns within the School or Trust in order for the Executive Headteacher, Headteacher or Trustees to respond. As employees are often the first to realise that there may be something wrong within the school or Trust, it is important that they feel able to express their concerns without fear of harassment or victimisation. Otherwise they may find it easier to ignore the concern rather than report it.

The aims of this policy are:

- To provide avenues for employees to raise concerns internally as a matter of course, and receive feedback on any action taken;
- To provide for matters to be dealt with quickly and appropriately; and ensure that concerns are taken seriously and treated consistently and fairly;
- To provide staff with guidance as to how to raise those concerns;
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals or victimisation, even if they turn out to be mistaken;
- Allow employees to take the matter further if they are dissatisfied with the Local Authority Committee and/or Trust Board's response.

This policy does not form part of any 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 Trust and the Trust reserves the right to amend its content at any time.

This policy should not be used for complaints about an employee's personal circumstances, such as the way they have been treated at work. In these cases an employee should use the school's Grievance Procedure or Anti-bullying and Harassment policy as appropriate; if the matter relates to salary, the salary review procedures documented in the Trust's pay policy.

If staff are troubled by something, which you think the trustees should know about or look into, please use this policy. The Whistleblowing Policy is primarily for concerns where the interests of others or of the organisation itself are at risk. If in doubt – report it. The earlier an employee expresses the concern, the easier it is to take action.

All policies incorporate the following schools or organisations within Wandle Learning Trust (WLT):

- Chestnut Grove Academy;
- Chesterton Primary School;
- Fircroft Primary School;

- Grovelands Primary School;
- Hellingly Primary School;
- Kensington Avenue Primary School;
- Norbury High School for Girls;
- Paxton Academy;
- Ravenstone Primary School;
- Thomson House School;
- Little Wandle;
- Wandle Learning Partnership;
- Centrally employed staff
- Any other schools or organisations that may join WLT from time to time as not listed above, unless otherwise specified.

The terms Academy, School, Organisation and Trust are considered interchangeable in the context of all Trust policies.

Where appropriate, in this policy the term:

“Executive Team” means the Trust’s Executive Headteachers and includes the Trust’s Chief Operating Officer (COO) who manage the day-to-day business of the Trust.

“Headteacher” includes the appropriate School Headteacher.

“Trustees or Trust Board” are appointed trustees who oversee the business of Wandle Learning Trust, agreeing the overarching strategic direction and ensuring robust governance.

“Local Academy Committee (LAC)” includes appointed Governors at a local Academy level and support each schools Leadership Teams to implement policies and improvement plan priorities.

“Chair” heads the board of Trustees or LAC, provides leadership to the Trust’s Executive Team and/or relevant Headteachers and leads the charge on key Board decisions.

“Head of Governance” provides an administrative resource for the Trust and LAC Boards and ensures the smooth running of its functions, processes and meetings

“Stakeholders” are any individuals or companies who are invested in the welfare and success of the Trust and/or School and its students, including staff members, students, parents, community members, LAC or Trust members, trade unions, local business leaders etc.

2. What is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work (a qualifying disclosure). This may include:

- criminal activity;
- child protection and/or safeguarding concerns;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- failure to comply with any legal or professional obligation or regulatory requirements;
- financial fraud or mismanagement;
- negligence;
- breach of our internal policies and procedures including our Code of Conduct;
- conduct likely to damage the School's reputation;
- unauthorised disclosure of confidential information;
- sexual harassment by another employee or third party;
- the deliberate concealment of any of the above matters.

A **whistleblower** is a person who raises a genuine concern that he/she believes is in the public interest, i.e. that it affects others not just themselves, relating to any of the above.

If employees are uncertain whether something is within the scope of this policy you should seek confidential advice from the Head of HR.

Before initiating the procedure, employees should consider the following:

- the responsibility for expressing concerns about unacceptable practice or behaviour rests with all employees
- employees should use line manager or team meetings and other opportunities to raise questions and seek clarification on issues which are of day-to-day concern
- whilst it can be difficult to raise concerns about the practice or behaviour of a colleague, employees must act to prevent an escalation of the problem and to prevent themselves being potentially implicated.

3. Safeguards

Harassment or Victimisation

The Local Authority Committee (LAC) and Board of Trustees recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The LAC and Board of Trustees will not tolerate harassment or victimisation and will take action to protect employees when they have a genuine concern.

This does not mean that if an employee is already the subject of internal procedures such as disciplinary or redundancy, that those procedures will be halted as a result of that employee raising a concern under the whistleblowing policy.

Confidentiality

We hope that employees will feel able to voice whistleblowing concerns openly under this policy. The LAC and Trust Board will make every effort to protect an employee's identity if confidentiality is requested.

As indicated above, identity will be protected as far as possible, but should the investigation into the concern require the employee to be named as the source of the information, that this will be discussed with the employee before their name is disclosed.

Anonymous Allegations

You are encouraged to put your name to an allegation. Proper investigation may be more difficult or impossible if we cannot obtain further information and it is also more difficult to establish whether allegations are credible. Anonymous allegations will be considered at the discretion of the LAC and/or Trust Board. In exercising the discretion, the factors to be taken into account would include:

- the seriousness of the issues raised
- the credibility of the concern
- the likelihood of confirming the allegation from attributable sources.

Untrue Allegations

If an employee makes an allegation where they have a genuine belief, but it is not confirmed by the investigation, no action will be taken against that employee. If, however, we conclude that an employee has made malicious or vexatious allegations, or with a view to personal gain, disciplinary action may be taken against that employee.

Unfounded Allegations

Following investigation, allegations may be confirmed as unfounded. This outcome will be notified to the employee who raised the concern, who will be informed that the LAC and/or Trust Board deems the matter to be concluded and that it should not be raised again unless new evidence becomes available.

Support to Employees

It is recognised that raising concerns can be difficult and stressful. Advice and support will be made available, as appropriate, to both the employee/s raising the concerns and any employee/s subject to investigation. Employees are encouraged to seek further information from HR.

4. How to Raise a Concern

The first point of contact for any concern will normally be your Line Manager. This depends, however, on the seriousness and sensitivity of the issues and who is involved. Concerns regarding child protection relating to another colleague should be shared immediately with the school's Designated Safeguarding Lead (DSL).

Where the matter is more serious, or you feel that your Line Manager has not addressed your concern, you should contact one of the following ('The Senior Manager'):

1. Headteacher, for all members of staff at the relevant school;
2. A Co-CEO, if it relates to a Headteacher or for all members of staff who don't work for a school; or
3. Chair of Trustees via the Head of Governance

Concerns are better raised in writing, but will be accepted verbally. You should set out the background and history of the concerns, giving names, dates and places where possible, and the reasons why they are particularly concerned about the situation. If an employee does not feel able to put the concern in writing, they should arrange to meet the appropriate person and raise the concern. It is important that, however the concern is raised, the employee makes it clear that they are raising the issue via the whistle-blowing procedure.

The Trust representative will arrange to meet you following receipt of your concern to confirm any further details and/or aim to give you an indication of how we propose to deal with the matter (see section 5 below for further details). You are not expected to prove the truth of any allegations but will need to demonstrate that there are sufficient grounds for the concern.

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

In some cases the School may appoint an investigator or team of investigators including Staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable the School or Trust to minimise the risk of future wrongdoing.

5. Investigation and outcome

Stage 1:

The Senior Manager that the concern was raised with should respond immediately by arranging to meet with the employee to discuss the concern/s as soon as possible in which they will carry out an initial assessment to determine the scope for any investigation.

At the initial meeting the Senior Manager should establish that:

- there is genuine cause and sufficient grounds for the concern; and
- the concern has been appropriately raised via the Whistle-blowing Policy

The Senior Manager will follow the policy as set out above, in addition to confirming:

- who they will need to speak to in order to determine the next steps (e.g. Executive Headteacher, Chair of Trustees);
- what steps they intend to take to address the concern;
- how they will communicate with you during and at the end of the process. It should be noted that the need for confidentiality may prevent the school giving you specific details of any necessary investigation or any necessary disciplinary action taken as a result.
- That the Trust will do all that it can to protect the employee from discrimination and/or victimisation

You will receive a written response within ten working days of receipt of your concern to: acknowledge receipt, indicate how the Trust propose to deal with the matter, provide an estimate of how long it may take to provide a final response, tell staff whether initial enquiries have been made and tell you whether further investigations are needed or if not why not and let you know when they will receive further details if the situation is not yet resolved.

If the School concludes that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to the Trust's Disciplinary Policy and Procedure.

The investigation may confirm your allegations to be unfounded in which case the LAC and/or Board of Trustees will deem the matter to be concluded unless new evidence becomes available.

Stage 2:

Following the initial meeting with the employee, the Senior Manager should consult with the Co-CEOs or Chair of the Trustees to determine whether an investigation is appropriate and, if so, what form it should take. A record should be made of the decisions and/or agreed actions.

In some cases, it may be possible to resolve the concern/s simply, by agreed action or an explanation regarding the concern/s, without the need for further investigation. However, depending on the nature of the concern/s it may be necessary for the concern/s to:

- be investigated internally
- be referred to the police
- a referral to the child protection officer
- be referred to the external auditor
- form the subject of an independent inquiry.

On conclusion of any investigation, the employee will be told the outcome of the investigation and what the Trust has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

Should the situation not already been resolved, you will updated accordingly in writing by the date specified in the initial letter issued.

6. If you are not satisfied

Whilst the Trust cannot always guarantee the outcome a particular member of staff is seeking, the School will try to deal with the concern fairly and in an appropriate way. If a member of staff is not happy with the way in which his or her concern has been handled, he or she can raise it with one of the other key contacts outlined in this policy.

7. 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. The independent whistleblowing charity, Protect, operates a confidential helpline. Their contact details are as follows:

Protect
(Independent whistleblowing charity)

Helpline: **020 3117 2520**

E-mail: whistle@protect-advice.org.uk

Website: www.pcaw.org.uk

You may also raise your concerns externally via the following channels, all of which you will find further information about online:

- Recognised Trade Union;
- Senior Local Authority Officer;
- External Auditor;
- Relevant professional bodies or regulatory organisations;
- Solicitor;
- Police (if it relates to a potential criminal matter);
- NSPCC (if there are concerns about safeguarding practices).

The Trust wish to make you aware that if they choose to take a concern outside the school, it is the employee's responsibility to ensure that confidential information is not disclosed, i.e. confidential information, in whatever format, is not handed over to a third party.

Whistleblowing concerns usually relate to the conduct of Trust Staff, but they may sometimes relate to the actions of a third party, such as a service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, Staff are encouraged to report such concerns internally first. Staff should contact one of the other individuals set out above for guidance.

8. How do Trustees, Trust Members or Local Academy Committee (LAC) Members raise Concerns?

Trustees and LAC Members are often involved in the daily life of the trust and its schools and may notice things that cause them concern. This may be through direct observation, conversations with staff and pupils, information given to them by pupils, staff or parents and through documentation they receive as part of their governance responsibilities.

If a Trustee, Trust Member or LAC Member has a concern about a member of staff or procedures within the Trust they should follow the same procedures as all other staff as detailed in this policy.

If a Trustee or LA Members has a concern about a Co-CEO and the Chair of Trustees collectively, they should inform an external body as detailed in section 8.

9. Protection against Detriment

Where an employee makes an allegation under this policy that relates to the specified wrongdoings above and it meets the public interest requirement, then it is regarded as a protected disclosure. The employee is then protected from detriment, i.e. any form of unfavourable treatment short of dismissal related to them raising whistleblowing allegations

This could include:

- Bullying and harassment
- Being overlooked for promotion
- Changes to duties without good reason
- Dismissal

10. Monitoring of the Policy

All Staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. The policy/procedure will be reviewed by the Trust Board via HR as necessary.

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 Head of HR in the first instance.