

Lacey Green Primary Academy

Whistleblowing Policy



Policy Reviewed: July 2026

Review Date: July 2027

Lacey Green Primary Academy agree that 'whistle blowing' is the "raising of concerns about misconduct within an organisation". We actively encourage all Academy personnel to report any serious concerns about any aspect of the Academy or the conduct of its personnel or others acting on behalf of the Academy. We are committed to the highest possible standards of openness, integrity and accountability.

We believe that where the concern relates to an individual's own employment the Academy's Grievance Policy must be used. However, if the concern relates to something which is against the Academy's policies, falls below standards of practice or amounts to improper conduct then the procedures in this policy must be used.

We as an Academy community have a commitment to promote equality. Therefore, an equality impact assessment has been undertaken and we believe this policy is in line with the Equality Act 2010.

The requirement to have clear whistle-blowing procedures in place is set out in the [Academy Trust Handbook](#).

This policy has been written in line with the above document, as well as [government guidance on whistle-blowing](#). We have also taken into account the [Public Interest Disclosure Act 1998](#).

Aims

Encourage Academy personnel to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated, and that their confidentiality will be respected

Let all staff in the Academy know how to raise concerns about potential wrongdoing in or by the Academy
Set clear procedures for how the Academy will respond to such concerns, ensuring that staff know that concerns raised by whistle-blowers will be responded to properly and fairly

Let all staff know the protection available to them if they raise whistle-blowing concern

Assure staff that they will not be victimised for raising a legitimate concern through the steps set out in the policy, even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue)

Ensure staff know that they are protected by law and that a non-disclosure agreement, confidentiality clause or 'gagging clause' in a settlement agreement or employment contract cannot stop them from making a protected disclosure in the public interest

Definitions of Whistleblowing

Whistle-blowing covers concerns made that report wrongdoing that is “in the public interest”. Examples of whistleblowing include (but are not limited to):

- Criminal offences, such as fraud or corruption
- Pupils’ or staff health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Sexual harassment (in effect from 6 April 2026)
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment
-

A whistle-blower is a person who raises a genuine concern relating to the above. These concerns should be reported under this policy.

Not all concerns will count as whistleblowing. For example, personal staff grievances such as bullying or 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 (e.g. pupil health and safety), the staff member must consult with the principal to decide the most appropriate reporting procedure.

When staff are concerned, they should consider whether it would be better to follow our staff grievance or complaints procedures.

Responsibility for the Policy and Procedure

When a concern has been raised the following procedure will be followed:

This procedure is not designed to replace or be used as an alternative to the grievance procedure, which should be used where an employee is only aggrieved about his/her own situation.

Employees who are worried about wrong doing at work do not necessarily have a personal grievance.

Employees must reasonably believe and must have reasonable grounds for believing the information to be accurate.

No employee who uses this procedure who reasonably believes will be penalised for doing so. The Academy will not tolerate harassment and/or victimisation of any employee raising concerns.

An employee who is not sure whether the conduct he/she is concerned about does constitute illegal or improper conduct or is unsure about how to proceed can contact any of the names listed below for advice.

Financial regulations require any employee who suspects fraud, corruption or other financial irregularity to ensure this is reported to the Chief Internal Auditor for possible investigation. Normally, you must first report any suspicion of such irregularity to the Principal, who will in turn report it to the Chair of Finance Committee. In most cases, this will be done through your line management structure

Examples of Illegal and/or Improper Conduct

- fraudulent or improper use of the Academy's money or assets
- abuse of pupils or of other employees
- dangerous practices at work
- corruptly receiving any gift or advantage
- allowing private interests and those of the Academy to conflict

Role of the Governing Body

The Governing Body has:

- delegated powers and responsibilities to the Principal to ensure all Academy personnel and visitors to the Academy are aware of and comply with this policy;
- responsibility for ensuring that the Academy complies with all equalities legislation;
- nominated a designated Equalities governor to ensure that appropriate action will be taken to deal with all prejudice related incidents or incidents which are a breach of this policy;
- responsibility for ensuring funding is in place to support this policy;
- responsibility for ensuring this policy and all policies are maintained and updated regularly;
- responsibility for ensuring all policies are made available to parents;
- responsibility for the effective implementation, monitoring and evaluation of this policy

Role of the Principal

The Principal will:

- ensure all Academy personnel and volunteers are aware of and comply with this policy;
- provide leadership and vision in respect of equality;
- provide guidance, support and training to all staff;
- monitor the effectiveness of this policy;

Support for Academy Personnel

The Governing Body will provide support for both:

- the member of staff who has raised the concern;
- the member of staff against whom allegations have been made

During the investigation the Governing Body will keep both parties informed of all progress.

No action will be taken against a member of staff if, after investigation, their concern has not been confirmed.

Disciplinary action will be taken if a concern is raised frivolously, maliciously or for personal gain.

Confidentiality

All concerns raised are investigated and every effort is made to ensure confidentiality for all parties.
Raising a Concern

As a first step you should normally raise concerns with your immediate manager or Principal. However, depending on the seriousness and sensitivity of the issue it may be appropriate to raise the issue with the Chair of Governors or Trustees.

Concerns are best raised in writing. Staff are encouraged to use the following format:

- ✓ The background and history of the concern
- ✓ The reason why you are particularly concerned about the situation
- ✓ If you are not able to put your concern in writing you should meet with the appropriate person as detailed above.
- ✓ You are encouraged to put your name to your allegation. Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Governing Body in line with corporate guidelines.
- ✓ You may wish to consider discussing your concern with a colleague or trade union representative, you may wish to bring a representative along to any meetings you may have.

The Academy recognises that reporting a concern can be difficult. If you raise a concern and reasonably believe you will have nothing to fear. All concerns raised will be treated in confidence and every effort made not to reveal your identity if you so wish. However, you need to be aware that you may need to come forward as a witness. The Principal will appoint another member of the senior management team to be your welfare lead. Should your concern involve the Principal or Head of School, the Chair of Governors will make the necessary appointment.

How the Academy will respond

The Academy will respond to your concerns. Do not forget that testing out your concerns is not the same as either accepting them or rejecting them. Where appropriate the matter raised may:

- Be investigated within the Academy
- Be referred to the Chair of Governors
- Be referred to the Trustees
- Be referred to the police
- Form the subject of an independent enquiry

If the matter is dealt with within Academy, the Principal (or another member of the management team) or Governing Body will respond to the concern. Where there is a concern regarding the Principal or Head of School, the Chair of Governors will respond.

If you are not satisfied with any action taken or you feel it is right to take the matter outside the Academy the following are possible contacts points:

Your solicitor
Your trade union
Your local Citizens Advice Bureau
Relevant professional bodies or regulatory organisations
A relevant voluntary organisation
The Police
The National Audit Office

However, please be aware that you may not necessarily be informed of the outcome of your concern.

Disclosures

Academy personnel have a duty to the Academy not to disclose confidential information. However, in accordance with the provisions of the Public Interest Disclosure Act 1998 this does not prevent an employee from seeking independent advice.

Training

We ensure all Academy personnel have equal chances of training, career development and promotion.

Periodic training will be organised for all Academy personnel so that they are kept up to date with new information and guide lines concerning equal opportunities.

Equality Impact Assessment

Under the Equality Act 2010 we have a duty not to discriminate against people on the basis of their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation.

This policy has been equality impact assessed and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any pupil and it helps to promote equality at this Academy.

This document should be read in conjunction with the Academy's Complaints Procedure Policy.

Monitoring the Effectiveness of the Policy

This policy will be reviewed and updated in July 2027 or when any new guidelines and legislation are issued by any relevant bodies or where the Academy feels it is necessary.