

Whistleblowing Policy

Date approved: September 2026
Date of next review: September 2027

Version Control Table

Version	Date	Author	Summary of Changes	Ratified
1.0	Sept 2025	JMP	Initial Trust Whistleblowing Policy.	23/09/2025
2.0	Sept 2026	JMP/HR Audit	Comprehensive update following audit: introduced dedicated Legislative Framework; aligned safeguarding with KCSIE 2026 and LADO procedures;	06/10/26

			replaced Public Concern at Work with Protect; expanded prescribed external regulatory bodies; strengthened UK GDPR/DPA 2018 provisions; clarified statutory worker scope vs non-statutory coverage; updated investigation timescales and progress update requirements; aligned record retention with Trust Records Retention Schedule; introduced annual anonymised governance reporting and Trustee oversight; established Speak Up culture, anti-retaliation, and training provisions; and corrected section numbering and terminology inconsistencies.	
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1. Introduction & Speak Up Culture

1.1 Connect Alliance Trust ("the Trust") is committed to operating with the highest standards of integrity, openness, probity, and accountability. This policy establishes a clear procedural framework enabling individuals to report genuine and legitimate concerns regarding illegal, improper, or unethical conduct in the workplace without fear of reprisal, victimisation, or detriment.

1.2 The Trust actively fosters a **"Speak Up" culture** characterised by openness, psychological safety, and constructive challenge. Staff and volunteers are encouraged to raise concerns at the earliest opportunity, trusting that they will be taken seriously, investigated discreetly, and addressed appropriately.

1.3 This policy accords with current employment law, statutory education guidance, and academy trust governance standards.

2. Legislative Framework

2.1 This policy operates within the following statutory framework and statutory guidance:

- **Employment Rights Act 1996** (Part IVA, as amended)
- **Public Interest Disclosure Act 1998 (PIDA)**
- **Enterprise and Regulatory Reform Act 2013**
- **Education Act 2002**
- **Keeping Children Safe in Education (KCSIE) 2026**
- **Equality Act 2010**
- **Data Protection Act 2018 & UK General Data Protection Regulation (UK GDPR)**

- **Academy Trust Handbook**

3. Definitions & Public Interest

3.1 Whistleblowing is the disclosure of information relating to suspected malpractice, illegal acts, or wrongdoing in the workplace.

3.2 Under Part IVA of the Employment Rights Act 1996, a **qualifying disclosure** is a disclosure of information made in the public interest by a worker who reasonably believes that one or more of the following has occurred, is occurring, or is likely to occur:

- A criminal offence;
- A failure to comply with a legal obligation;
- A miscarriage of justice;
- A danger to the health and safety of any individual;
- Damage to the environment; or
- A deliberate concealment of any of the above.

3.3 **Public Interest & Reasonable Belief:** A disclosure must normally concern a matter that impacts others (such as pupils, staff, the public, or the proper running of the Trust) rather than a purely personal grievance. The worker does not require definitive proof, provided the belief is reasonable and held in good faith.

3.4 **Relevant Person:** Refers to the Headteacher / Head of School, a member of the Executive Team / CEO, or the Chair of the Trust Board (where a disclosure concerns the Headteacher, CEO, or Central Team member).

3.5 **School :** Refers to any school within Connect Alliance Trust.

4. Scope & Statutory Protection

4.1 **Statutory Workers:** Legal protection under PIDA applies to all employees, paid workers, consultants, temporary and agency staff, and trainees.

4.2 **Non-Statutory Individuals:** While statutory protection under ERA 1996 does not automatically extend to volunteers, self-employed contractors, Governors, Trustees, or members of the public, the Trust extends the principles and reporting routes of this policy to all individuals working within or alongside our schools.

4.3 **Personal Grievances:** Concerns regarding an employee's personal employment situation, terms, or breach of contract must be raised under the Trust Grievance Policy rather than this policy.

4.4 **Capability Concerns:** Concerns purely regarding a colleague's professional capability should be managed through line management or the Trust Capability Policy.

5. How to Raise a Concern (Internal Reporting)

5.1 **Line Manager:** Employees are encouraged to raise concerns with their immediate Line Manager where possible, as many matters can be resolved swiftly at this level.

5.2 **Headteacher / Head of School:** Where the matter is more serious, or where the line manager is implicated or has failed to act, the concern should be reported directly to the

Headteacher or Head of School.

5.3 Trust Executive Team / Chair of Trustees:

- If the concern relates to the Headteacher / Head of School, it should be raised with the Chief Executive Officer (CEO) or if the concern relates to a member of the Central team this should be raised with their appropriate line manager.
- If the concern relates to the CEO, or a Trustee, it must be reported to the **Chair of the Trust Board**.
- If the concern relates to the Chair of the Trust Board, it must be reported to the **Vice Chair of the Trust Board** or the **Designated Trustee Whistleblowing Champion**.

5.4 Written Submissions: Concerns should ideally be submitted in writing, detailing:

- The background, dates, and nature of the alleged wrongdoing;
- Names of individuals involved;
- Supporting evidence or documentation; and
- Contact details (unless choosing to report anonymously).
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5.5 Oral Submissions: Where an individual is unable to submit a report in writing, they may request a meeting with a Relevant Person, who will record the concern and confirm the accuracy of the record with the individual.

6. How the Trust Will Respond

6.1 The Relevant Person will issue a written acknowledgment to the whistleblower within **10 working days** of receiving the concern.

6.2 The acknowledgment will confirm:

- How the Trust proposes to deal with the matter;
- The policy under which it will be investigated;
- Contact details of the appointed Investigating Officer;
- Confidentiality protocols and data protection arrangements;
- Expected timescales for investigation updates; and
- Support measures available (including the Employee Assistance Programme).

6.3 Where an initial evaluation indicates that a concern can be resolved through informal management action without formal investigation, written confirmation of the resolution will be provided to the whistleblower.

7. The Investigation Process

7.1 Investigator Independence & Capability: Investigations must be independent, objective, and conducted by an appropriately trained officer with no prior involvement in the matter. For allegations involving Headteachers or Central Team Executives, an independent external investigator may be appointed.

7.2 Timescales & Progress Updates: Investigations will normally be completed within **30 working days**. Where an investigation is complex and requires an extended timeframe, the

Investigating Officer will provide written progress updates to the whistleblower every 15 working days.

7.3 Right to Representation: During any investigation meetings, the whistleblower and witnesses are entitled to be accompanied by a Trade Union representative or a workplace colleague.

7.4 Urgent Action: Where an allegation indicates immediate risk to pupil safety, financial loss, or criminal activity, emergency protective action may be taken prior to full investigation completion.

8. Outcome of the Investigation & System Learning

8.1 Upon conclusion, the Investigating Officer will submit a detailed report to the Relevant Person (or Chair of Trustees), recommending appropriate action, which may include:

- Dismissal of the allegation as unfounded;
- Informal management instruction, policy revision, or staff retraining;
- Initiation of formal disciplinary procedures under the Trust Disciplinary Policy;
- Referral to external bodies (e.g., Police, LADO, TRA, ESFA).

8.2 Subject to legal and privacy constraints, the whistleblower will be informed in writing of the outcome and next steps.

8.3 Lessons Learned: Following any formal whistleblowing investigation, the Executive Leadership Team and Trust Board will review findings to identify systemic weaknesses, update risk registers, and improve operational controls.

9. Confidentiality & Data Protection

9.1 All disclosures will be handled with strict confidentiality. The identity of the whistleblower will not be disclosed without consent unless required by law or statutory safeguarding obligations.

9.2 Data Protection Compliance: Personal data collected during whistleblowing processes will be processed in accordance with the UK GDPR, Data Protection Act 2018, and the Trust Data Protection Policy. Information will be held securely and accessed only by those directly involved in investigating and resolving the concern.

10. Recording Whistleblowing Concerns & Retention

10.1 The Trust Central HR Team maintains a confidential, restricted-access central record of all whistleblowing allegations, investigation progress, and outcomes across all Trust schools.

10.2 Retention Period: Whistleblowing records are retained in strict accordance with the **Trust Records Retention Schedule** and data protection guidance (superseding fixed retention periods), after which records are securely destroyed.

11. Anonymous Concerns

11.1 The Trust encourages individuals to identify themselves when raising concerns to facilitate thorough investigation and communication.

11.2 Anonymous disclosures will be recorded and evaluated. The decision to investigate an anonymous concern rests with the Relevant Person, taking into account:

- The seriousness of the issues raised;
- The credibility of the concern; and
- The likelihood of confirming allegations through attributable sources.

11.3 Whistleblowers should note that anonymous reporting limits the ability to obtain further evidence, provide progress updates, or offer direct personal protection against detriment.

12. False and Malicious Allegations vs. Good Faith

12.1 **Good Faith Protection:** If a worker raises a concern in good faith based on a reasonable belief, but the concern is unsubstantiated following investigation, no action or detriment will be taken against them.

12.2 **Malicious Allegations:** If an investigation reveals that an employee has knowingly made false, malicious, or vexatious allegations, this will be treated as serious misconduct under the Trust Disciplinary Policy.

13. Protection Against Harassment, Victimisation & Retaliation

13.1 **Zero Tolerance:** The Trust strictly prohibits retaliation, harassment, or victimisation against any individual who raises a protected disclosure.

13.2 **Disciplinary Sanction:** Any employee or manager who subjects a whistleblower to victimisation or detriment will be subject to formal disciplinary action, which may result in dismissal for gross misconduct.

13.3 **Employee Support:** Whistleblowers and witnesses have access to Trust support services, including:

- The Trust Employee Assistance Programme (EAP);
- Occupational Health services;
- Trade Union support; and
- Designated wellbeing leads.
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14. Safeguarding Concerns, LADO & KCSIE Alignment

14.1 **Safeguarding Priority:** All staff have an absolute duty to report safeguarding or child protection concerns immediately in accordance with **Keeping Children Safe in Education (KCSIE) 2026** and the Trust Safeguarding Policy.

14.2 Reporting Safeguarding Concerns:

- Concerns regarding pupil harm or risk must be reported immediately to the school's **Designated Safeguarding Lead (DSL)**.
- Concerns or allegations against staff, contractors, or volunteers must be reported to the

Headteacher / Head of School.

- Concerns or allegations against the Headteacher must be reported to the CEO, an allegation against the CEO will be reported to the Chair of Trustees.

14.3 LADO Referrals: Where an allegation against a staff member meets the harm threshold set out in KCSIE 2026, the Headteacher or CEO will notify the **Local Authority Designated Officer (LADO)** within **1 working day** and follow statutory multi-agency guidance.

14.4 NSPCC Whistleblowing Helpline: Staff who feel unable to raise safeguarding concerns internally, or who feel a safeguarding concern has not been addressed, can contact the **NSPCC Whistleblowing Helpline** on 0800 028 0285 or via email at help@nspcc.org.uk.

15. External Disclosures & Prescribed Bodies

15.1 The Trust hopes that internal procedures will give staff the confidence to raise concerns internally. However, workers have the legal right to make a protected disclosure to an external prescribed body under PIDA 1998.

15.2 Independent Advice: For confidential, independent whistleblowing advice, workers may contact:

- **Protect** (formerly Public Concern at Work):
Website: www.protect-advice.org.uk | Helpline: 020 3117 2520
- Their Trade Union or professional association;
- An independent legal advisor.

15.3 Prescribed External Bodies:

- **Department for Education (DfE)** : www.gov.uk/dfe
- **Ofsted**: enquiries@ofsted.gov.uk | Helpline: 0300 123 3155
- **Teaching Regulation Agency (TRA)**: misconduct.teacher@education.gov.uk
- **Charity Commission**: www.gov.uk/charity-commission
- **Information Commissioner's Office (ICO)**: www.ico.org.uk | Helpline: 0303 123 1113
- **Disclosure and Barring Service (DBS)**: www.gov.uk/dbs
- **Health and Safety Executive (HSE)**: www.hse.gov.uk
- **Financial Reporting Council (FRC)**: www.frc.org.uk
- **Local Police / Local Authority Designated Officer (LADO)**

15.4 Unauthorised / Press Disclosures: Disclosing confidential workplace information to external third parties (such as the media or social media platforms) without statutory justification or legal protection under PIDA may constitute serious misconduct and lead to formal disciplinary action.

16. Governance, Trustee Oversight & Training

16.1 Trust Board Oversight: The Trust Board holds overall accountability for this policy and its effectiveness.

16.2 Annual Reporting: The CEO and Central HR Director will present an **annual anonymised whistleblowing report** to the Trust FOAR Committee. The report will detail:

- Total number and nature of whistleblowing disclosures;
- Investigation status and outcomes;
- Identified trends or systemic weaknesses; and
- Corrective actions implemented.

16.3 Whistleblowing Champion: The Trust Board has designated the **Chair FOAR Committee** as the Trustee Whistleblowing Champion with oversight of policy implementation.

16.4 Training & Awareness:

- **Induction:** All new staff receive whistleblowing policy awareness training during day-1 onboarding.
- **Line Managers:** Managers receive training on handling disclosures, maintaining confidentiality, and preventing victimisation.
- **Refresher Training:** Periodic refresher training is provided to all staff every two years.

Appendix 1 - Staff & Governance Responsibilities

All Staff & Workers

- Maintain high standards of ethical conduct and professionalism.
- Challenge and report any observed malpractice, wrongdoing, or improper conduct.
- Cooperate fully with whistleblowing investigations when required.
- Maintain strict confidentiality regarding any whistleblowing disclosures.

Headteachers, Heads of School & Line Managers

- Foster an open culture where staff feel safe to raise concerns without fear.
- Communicate this policy effectively to all staff and volunteers under their supervision.
- Take all disclosures seriously and respond promptly, discreetly, and objectively.
- Support whistleblowers and witnesses, ensuring no individual suffers victimisation or detriment.
- Escalate disclosures to the CEO, HR Director, or LADO as appropriate.

Chief Executive Officer & Executive Team

- Ensure effective implementation of whistleblowing procedures across all Trust schools.
- Oversee independent investigations into complex or executive-level disclosures.
- Ensure central recording, data protection, and retention compliance.
- Report anonymised trends and lessons learned to the Trust Board.

Trust Board & Trustees

- Approve, review, and maintain an up-to-date statutory Whistleblowing Policy.
- Receive and review annual anonymised reports on whistleblowing activity and themes.
- Designate the Chair of Trustees (or Vice Chair) as the contact point for disclosures involving Executive Leaders.
- Appoint a Trustee Whistleblowing Champion to oversee policy effectiveness and governance integrity.