



Whistleblowing Policy

Associated Policies:	Grievance resolution policy Code of conduct for staff and volunteers Procedure for allegations against staff and volunteers Online safety and acceptable use policy Pay policy Safeguarding & child protection policy Complaints policy
Owner & reviewer:	HR Manager
Secondary reviewer:	CFOO
Date Approved:	28 July 2025
Approved by:	Board of Trustees
Date issued:	2 nd September 2025
Date of Review:	September 2028
Website Inclusion	Y
Version:	Final 1.1

CONTENTS

Contents	1
1. Policy review arrangements	2
2. Definition of roles.....	2
3. Policy statement.....	3
4. Background	3
5. Definition of whistleblowing	4
6. Safeguards.....	5
6.1 Harassment or victimisation	5
6.2 Confidentiality.....	5
6.3 Anonymous allegations.....	5

6.4 Untrue allegations	6
6.5 Unfounded allegations	6
6.6 Support	6
7. Raising a concern	6
7.1 When to raise a concern	6
7.2 Who to report to	6
7.3 How to raise the concern	7
8. Procedure for responding to a whistleblowing concern	8
8.1 Investigating the concern	8
8.2 Outcome of the investigation	8
9. Escalating concerns beyond the Trust	9

1. POLICY REVIEW ARRANGEMENTS

The Chief Executive Officer will be responsible for monitoring the implementation and effectiveness of this policy and associated procedure.

The Trust HR Manager for Northampton Primary Academy Trust will retain responsibility for review of this policy.

This policy will be reviewed every 3 years, or where required to do so in line with changes to guidance, legislation or procedure.

2. DEFINITION OF ROLES

Whistleblower: employees or other workers who provide services to the Trust in any capacity, including self-employed consultants or contractors who provide services on a personal basis, agency workers and volunteers.

Respondent: depending on the concern, this could be the Board of Trustees, the CEO, the CFOO, the Chair of Governors, the Headteacher or Line Manager.

Recipient: This could be the Headteacher, CFOO, Chair of Governors, CEO or the Chair of Trustees, depending on who the allegation is about.

3. POLICY STATEMENT

This whistleblowing policy sets out Northampton Primary Academy Trust's policy and procedure for dealing with concerns raised by employees that relate to suspected wrongdoing or dangers at work.

The policy aims to:

- encourage individuals affected 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 Trust know how to raise concerns about potential wrongdoing in or by the Trust
- set clear procedures for how the Trust will respond to such concerns
- let all staff know the protection available to them if they raise a whistleblowing 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).

Allegations of child abuse against teachers and other staff and volunteers is be dealt with in accordance with Keeping Children Safe in Education statutory guidance for schools and colleges.

4. BACKGROUND

it is important that employees 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 [Public Interest Disclosure Act 1998](#) recognises this fact and is designed to protect employees who make certain disclosures of information in 'the public interest' from detriment and/or dismissal. This policy builds on the provisions of the Act.

The requirement to have clear whistleblowing procedures in place is set out in the [Academy Trust Handbook](#). This policy has been written in line with this document, as well as [government guidance on whistleblowing](#). This policy complies with our funding agreement and articles of association.

Northampton Primary Academy Trust's Board of Trustees is committed to the highest possible standard of operation, probity and accountability. In line with that

commitment, employees, officers, consultants, contractors, volunteers, casual workers and agency workers with serious concerns are encouraged to come forward and voice those concerns. This policy document makes it clear that employees can do so without fear of reprisals; it is intended to encourage and enable employees to raise serious concerns within the school rather than overlooking a problem or alerting anyone external to the school.

This policy does not form part of any employee's contract of employment, and it may be amended at any time.

5. DEFINITION OF WHISTLEBLOWING

Whistleblowing 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
- miscarriages of justice
- pupil or staff health and safety being put in danger
- failure to comply with a legal obligation or statutory requirement
- breaches of financial management procedures
- bribery
- negligence
- breach of internal policies and procedures (where an appeal process does not apply)
- unauthorised disclosure of confidential information
- attempts to cover up the above, or any other wrongdoing in the public interest
- damage to the environment.

A whistleblower is a person who raises a genuine concern relating to the above.

Not all concerns about the Trust, or individual schools in the Trust, 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 the matter relates to salary, the salary review procedures are documented in the Pay policy.

Protect (formerly Public Concern at Work) has:

- [Further guidance](#) on the difference between a whistleblowing concern and a grievance that staff may find useful if unsure
- A free and confidential [advice line](#) 020 3117 2520

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.

6. SAFEGUARDS

6.1 HARASSMENT OR VICTIMISATION

The School/Trust 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 School/Trust will not tolerate harassment or victimisation and will take action to protect whistleblowers when they have a genuine concern.

This does not mean that if an employee who whistleblows and 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.

6.2 CONFIDENTIALITY

We hope that whistleblowers will feel able to voice whistleblowing concerns openly under this policy. The School/Trust will make every effort to protect a whistleblower'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 whistleblower to be named as the source of the information, that this will be discussed with the whistleblower before their name is disclosed.

6.3 ANONYMOUS ALLEGATIONS

Whistleblowers are encouraged to put their 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 NPAT Central

Team. 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.

6.4 UNTRUE ALLEGATIONS

If an employee makes an allegation where they have a genuine concern, 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. Other action may be considered if the whistleblower is not an employee.

6.5 UNFOUNDED ALLEGATIONS

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

6.6 SUPPORT

It is recognised that raising concerns can be difficult and stressful. Advice and support will be made available, as appropriate to both the whistleblower raising the concerns and any employee(s) subject to investigation.

7. RAISING A CONCERN

7.1 WHEN TO RAISE A CONCERN

Whistleblowers should consider the examples in Section 5 when deciding whether their concern is of a whistleblowing nature. Consider whether the incident(s) was illegal, breached statutory or School/Trust procedures, put people in danger or was an attempt to cover any such activity up.

7.2 WHO TO REPORT TO

Staff should report their concern to the Headteacher/CFOO. If the concern is about the Headteacher/CFOO or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the Chair of Governors/the CEO.

If the concern is about the Chair of Governors/the CEO, or it is believed they may be involved in the wrongdoing in some way, staff should report the concern to the Chair of Trustees.

The recipient must log the whistleblowing concern with the Trust HR Manager before taking any action. The Trust HR Manager and CFOO will consider each case to determine if an investigation is appropriate, and if so, to pass the case back to the recipient to manage the process.

The recipient must seek advice from HR before taking any action.

Where an investigation is required, the recipient must appoint a suitable investigating officer, who will conduct the investigation in accordance with the School/Trust investigation guidelines. Upon completion of the investigation, the investigating officer must summarise their findings in a report and submit the report and all available evidence to the whistleblowing recipient.

Upon receipt of the investigation report, the recipient must decide if any action / what action is appropriate.

7.3 HOW TO RAISE THE CONCERN

Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff should make it clear they are raising their concern under the Whistleblowing Policy.

Staff raising a concern should also include details of any personal interest in the matter.

The earlier an employee expresses the concern, the easier it is to take action. In normal circumstances concerns should be raised within 3 months. Consideration will be given to a longer timeframe in exceptional circumstances and where evidence is available.

Although an employee is not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for the concern.

In some instances, it may be appropriate for an employee to ask the trade union to raise a matter on the employee's behalf. A trade union representative will not be able to answer questions on the employee's behalf.

8. PROCEDURE FOR RESPONDING TO A WHISTLEBLOWING CONCERN

8.1 INVESTIGATING THE CONCERN

When a concern is received by the Headteacher/CEO/Chair of Governors/Chair of Trustees – 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 representative or workplace colleague.
- get as much detail as possible about the concern at this meeting and record the information.
- reiterate, at this meeting, that they are protected 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 (see section 6 of this policy)
- establish whether there is sufficient cause for concern to warrant further investigation. If there is:
 - the recipient should then arrange a further investigation into the matter, involving the CEO, if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In others, they may need to report the matter to the police
 - 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
- If it becomes apparent the concern is not of a whistleblowing nature, the recipient should advise the person raising the concern, this is the case, and the matter will be handled in line with the appropriate policy/procedure.

8.2 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 or not 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 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. Matters relating to an individual’s employment will remain strictly confidential.

Whistleblowing investigations can vary in duration dependant on the complexity and severity of allegations. Where there are limited allegations and the complexity of a matter is deemed simple, we will endeavour to complete investigations within 30 school days. Where moderate, within 60 school days and where broad with systemic allegations, investigations may take longer.

Beyond the immediate actions, the CEO, the CFOO, Trustees, Chair of Governors, Headteacher, and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

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

When any meeting is arranged, the employee whistleblowing has the right to be accompanied by a trade union representative or work colleague. Meetings can be conducted 'off site' if requested.

9. ESCALATING CONCERNS BEYOND THE TRUST

The aim of this policy is to provide an internal mechanism for reporting, investigation and remedying any wrongdoing in the workplace. In most cases the employee should not find it necessary to alert anyone externally. The law recognises that in some circumstances it may be appropriate for the employee to report their concerns to an external body such as a regulator.

It will very rarely, if ever, be appropriate to alert the media, especially matters which are confidential. Employees are strongly encouraged to seek advice before reporting a concern to anyone external. If an employee is not satisfied with the Trust's response, the Headteacher/CFOO should ensure that they are made aware where they may raise the matter externally.

A list of prescribed bodies to whom staff can raise concerns with is included [here](#).

The Protect advice line, linked to in Section 5 of this policy, or an employee's trade union representative, can also help staff when deciding whether to raise the concern to an external party.