Abbey Multi Academy Trust

Policies & Procedures

Whistleblowing Policy

Approved on	08 July 2026
Approved by	Abbey MAT Board of Trustees
Next review due	31 July 2027

In Partnership to
Educate, Nurture and Empower

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Whistleblowing Policy

1. Introduction

Our Trust is committed to providing high-quality services and being fully accountable to the community it serves. While we have rules, standards and procedures to support high standards of conduct and service delivery, wrongdoing or serious failures can occur. The Trust aims to identify, address and prevent such issues.

The strongest deterrent to wrongdoing is the likelihood that it will be reported, properly investigated, those responsible held to account, and the matter remedied promptly. This policy confirms that reported wrongdoing will be investigated swiftly and thoroughly, and that the Trust will consider how to prevent similar issues in future.

2. Aims

This 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, ensuring that staff know the concerns raised by whistle-blowers will be responded to properly and fairly

- Let all staff know the protection available to them if they raise a 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 – see section 8 below)

- 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

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

This policy applies to all employees, officers, governors and trustees. Other workers, including consultants, contractors, agency staff and those on work placements, are also encouraged to use it.

3. Legislation

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 the above document, as well as government guidance on whistleblowing. We have also taken into account the Public Interest Disclosure Act 1998.

This policy complies with our funding agreement and articles of association.

4. 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
- Someone's (e.g. pupils or staff) health or safety being put in danger
- Failure to comply with a legal obligation or statutory entitlement
- Breaches of financial management procedures
- Sexual harassment
- Risk or actual damage to the environment
- Attempts to cover up the above, or any other wrongdoing in the public interest

A **whistleblower** is a person who raises a genuine concern relating to the above. Concerns of this nature should be reported under this policy.

Not all concerns about the Trust, or individual schools in the Trust, count as whistleblowing. For example, personal grievances such as bullying, harassment, and discrimination do not usually count as whistleblowing. If something affects a person as an individual, or relates to an individual employment contract, this is

likely a grievance unless the wrongdoing is in the public interest. This means it must affect others, for example, the general public.

If a concern involves personal circumstances alongside wider issues, such as pupil health and safety, the individual should seek advice from the Whistleblowing Officer or another appropriate contact listed in section 6.2 to decide the most appropriate procedure.

This policy supplements, rather than replaces, existing Trust procedures and provides a route where whistleblowing may be more appropriate.

When an individual has a concern, they should first consider whether it would be better to follow our grievance or complaints procedures.

Information and advice can be obtained from the charity Protect (formerly Public Concern at Work). This charity offers free legal advice in certain circumstances to people concerned about serious malpractice at work. Protect 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

Contact details for the charity are as follows:

Whistleblowing Advice Line: 020 3117 2520

Website: https://protect-advice.org.uk/

5. Employee cooperation and safeguards

Staff are encouraged to report genuine concerns about suspected malpractice or wrongdoing as soon as possible, using the routes set out in this policy. The Trust will take such concerns seriously, respect confidentiality where requested, and will not tolerate victimisation or reprisals against anyone who raises a genuine concern. Deliberately malicious or vexatious allegations may, however, be treated as a disciplinary matter, as set out in section 8.

6. Procedure for raising a whistleblowing concern

For procedures and timescales in the event of an allegation against a member of staff or person in school, please refer to the Safeguarding/Child Protection Policy which also details the timescales of notifying the LADO within one working day of the allegation being made.

6.1 When to raise a concern

Individuals should consider the examples in section 4 when deciding whether their concern is of a whistleblowing nature. They should consider whether the incident was illegal, breached statutory or Trust procedures, put people in danger or was an attempt to cover up such activity.

Individuals may raise a concern at any time about an incident that happened in the past, is happening now, or they believe will happen in the near future.

6.2 Who to report to

School-based staff and volunteers should report their concern to their Line Manager or Headteacher in most cases. If the concern is about the Headteacher, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the CEO, unless the CEO may also be involved. In that case, the concern should be reported to the Chair of the Trust Board.

Central team staff and volunteers should report their concern to their Line Manager or the CEO in most cases. If the concern is about their Line Manager, or it is believed they may be involved in the wrongdoing in some way, the concern should be reported to the CEO. If the concern is about the CEO, or it is believed they may be involved, it should be reported to the Chair of the Trust Board.

Where an individual feels unable to report their concern through the usual route, including because the person they would normally report to may be involved, they may contact one of the Whistleblowing Officers listed below. The individual should choose the person they consider most appropriate in the circumstances.

Position/Name	*Contact Details*
CEO Helen Pratten	helen.pratten@abbeytrust.org
Chair of the Trust Board Gefrin Price	gefrin.price@abbeytrust.org

For contractors, a clause will be inserted in all standard Trust contracts, highlighting that the Whistleblowing Policy applies to all their staff working on Trust business.

It will place a requirement on these contractors to publicise the Whistleblowing Policy to all their key staff involved with their contract for the Trust.

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

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

Staff are encouraged to give their name when reporting an allegation, to help the Trust take the investigation further. However, a complainant's right to anonymity will be respected.

A proper investigation may be more difficult, or in some cases impossible, if further information cannot be obtained from the whistleblower. Anonymous or unsupported concerns will be considered, but may need to be treated with caution where there is limited information to assess their credibility.

Staff who are concerned about possible reprisals if their identity is revealed should consult with one of the contact points listed in section 6.2. Appropriate measures can be taken to protect confidentiality where possible.

7. Trust procedure for responding to a whistleblowing concern

7.1 Investigating the concern

To protect both individuals and the Trust, when a concern is received by the Line Manager, Headteacher, CEO or other appropriate person, referred to from here as the **Whistleblowing Officer**, initial enquiries will be made to decide whether the matter falls within this policy and whether further investigation is required. This may include meeting with the person who raised the concern within a reasonable time to understand the issue, gather relevant details and record the information provided.

If it becomes apparent the concern is not of a whistleblowing nature, the Whistleblowing Officer will refer or handle the concern in line with the appropriate policy or procedure; for example, child protection or discrimination issues will normally be referred for separate consideration under their respective procedures.

Some concerns may be resolved by agreed action without the need for detailed investigation. Where further investigation is required, the Whistleblowing Officer will consider what form that investigation should take and who should be involved.

The Whistleblowing Officer will write to the whistleblower within **10 working days**, excluding periods of Trust or school closure, of receiving the concern. This initial response will:

a) Acknowledge that the concern has been received

b) Explain how the Whistleblowing Officer proposes to deal with the matter

c) Give an estimate of how long it will take to provide a final response

d) Indicate whether any initial enquiries have been made

e) Indicate whether further investigations will take place, and if not, why not

f) Reiterate that whistleblowers 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 8 of this policy)

If the Whistleblowing Officer establishes that there is sufficient cause for concern to warrant further investigation, they will arrange an investigation into the matter, involving relevant Trust personnel as 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 amount of contact between the Whistleblowing Officer considering the issues and the whistleblower will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of information provided. If necessary, further information will be sought from the whistleblower.

Where any meeting is arranged, the whistleblower has the right, if they wish, to be accompanied by a trade union or professional association representative or a friend/colleague who is not involved in the area of work to which the concern relates.

The Trust will take reasonable steps to minimise any difficulties experienced as a result of raising a concern. This may include providing information about relevant procedures, considering whether wellbeing check-ins or other support are appropriate, signposting to relevant support, and taking reasonable steps to protect emotional wellbeing and professional confidence.

7.2 Outcome of the investigation

Once the investigation is complete, the Whistleblowing Officer will prepare a report detailing the findings and confirming whether any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether a referral is required to an external organisation, such as the local authority or police.

The Whistleblowing Officer 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.

Beyond the immediate actions, the CEO, trustees 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.

7.3 Remit of the Whistleblowing Officer

Whistleblowing Officers have the following remit:

- To receive and record any concerns raised under this policy
- To ensure the confidentiality of any whistleblower who requests that their concern be treated in confidence
- To investigate any whistleblowing concern and respond directly to the whistleblower, with a right of access to the CEO, Trust employees and trustees, and to all documents and records of the Trust
- To report to the CEO where the investigation identifies a serious cause for concern within that officer's responsibilities and to recommend the use of any relevant statutory powers or duties. Where the concern relates to the conduct of a governor, trustee or CEO, they should report to the Chair of the Trust Board
- To report as appropriate, either jointly with the CEO or in their own right, to the Trust Board
- To recommend, in conjunction with the CEO, appropriate action to resolve a concern

- To report termly to the CEO on the number of concerns raised under this policy. Matters that identify fraud or loss to the Trust will be reported to the Finance & Resources Committee.

8. Malicious or vexatious allegations

Individuals are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the individual who raised the concern.

If, however, an allegation is shown to be deliberately invented or malicious, the Trust will consider whether any disciplinary action is appropriate against the person making the allegation.

9. Escalating concerns beyond the Trust

The Trust encourages individuals to raise their concerns internally, in line with section 6 of this policy, but recognises that individuals may feel the need to report concerns to an external body. A list of prescribed bodies to whom concerns can be raised is included here.

Individuals are advised to seek advice before reporting a concern to an external body. The Protect advice line, linked to in section 3 of this policy, can help staff when deciding whether to raise the concern with an external party.

10. Approval

This policy will be reviewed annually.

These procedures have been agreed by the board of trustees, who will approve them whenever reviewed.

11. Links with other policies

This policy links with our policies on:

- Grievance policy
- Complaints procedure
- Safeguarding/child protection policy
- Disciplinary policy

Appendix 1 – Summary Information for Whistleblowers

Where individuals feel unable to make use of the Trust's existing procedures, concerns regarding wrongdoing/malpractice (see section 4 for examples) can be raised under this policy as detailed in section 6 - please refer to Whistleblowing Process Overview (Appendix 2)

Whistleblowers* are protected from reprisals, victimisation or harrassment for whistleblowing in good faith, and may also have statutory protection under the Public Interest Disclosure Act 1998.

NOTE: Additional information and advice can be sought from the charity Protect - please refer to section 4 of the policy for contact details and further information.

Ideally, the Whistleblower should make their complaint in writing including: background and history, names, dates, places and as much evidence and context as possible. Individuals raising a concern should also include details of any personal interest in the matter and the reason(s) why the Whistleblower is particularly concerned.

The Trust will respect the confidentiality of any whistleblowing complaint received where the Whistleblower requests this.

NOTE: it will be easier to follow up and to verify complaints if the Whistleblower is prepared to provide their name. Unsupported anonymous complaints and allegations will have to be treated with caution.

Within 10 working days the Whistleblowing Officer** writes to the Whistleblower to:

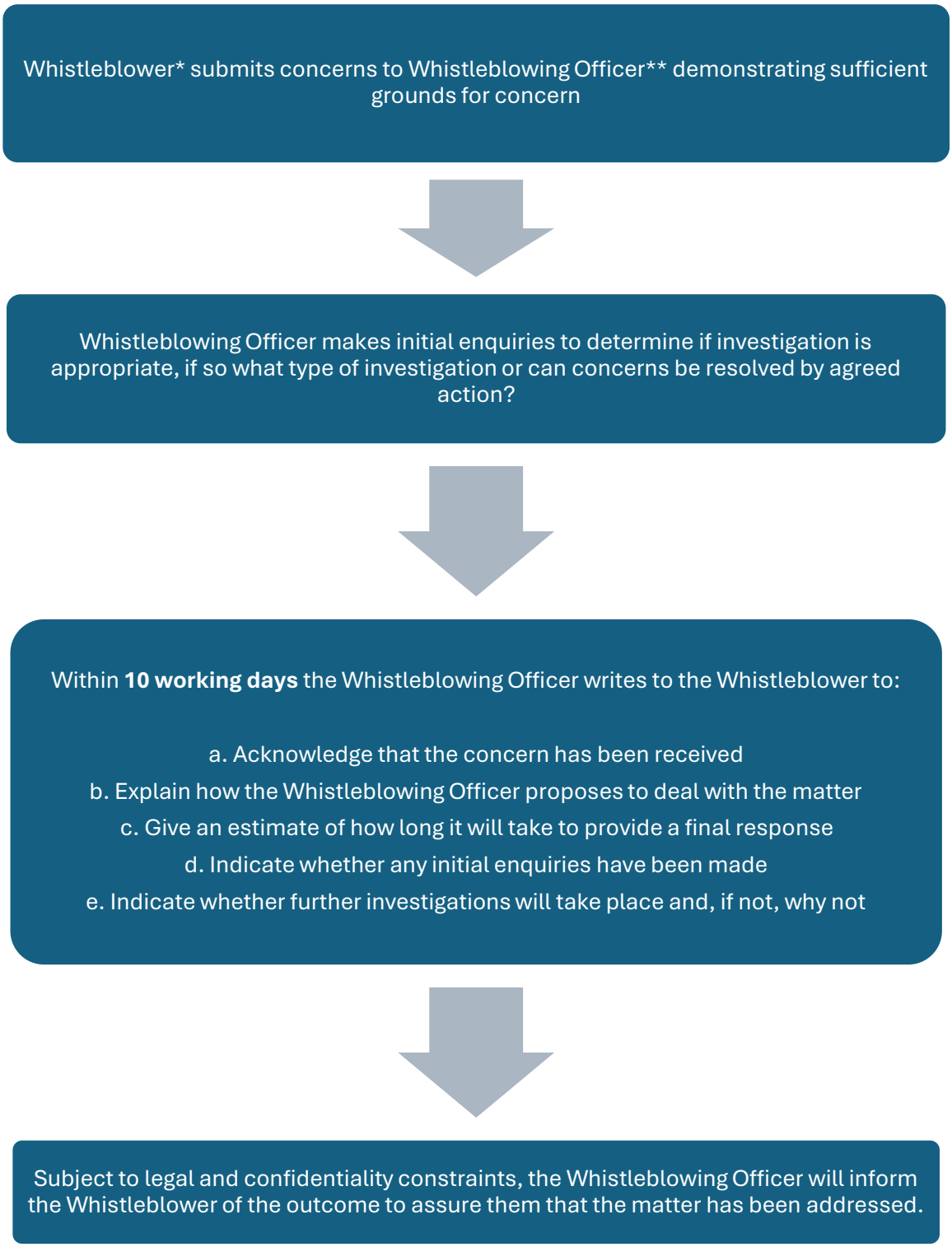
a. Acknowledge that the concern has been received
b. Explain how the Whistleblowing Officer proposes to deal with the matter
c. Give an estimate of how long it will take to provide a final response
d. Indicate whether any initial enquiries have been made
e. Indicate whether further investigations will take place and, if not, why not

The Whistleblowing Officer has the remit detailed under section 7.3 of this policy.

Subject to legal and confidentiality constraints, the Whistleblowing Officer will inform the Whistleblower of the outcome to assure them that the matter has been addressed.

* Whistleblower = complainant
** Whistleblowing Officer = Line Manager/Headteacher or one of those listed in the policy investigating concerns

Appendix 2 – Whistleblowing Process Overview



* Whistleblower = complainant
** Whistleblowing Officer = Line Manager/Headteacher or one of those listed in the policy investigating concerns