# WHISTLEBLOWING POLICY

| Approved by: Trust Board | |
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| **Chair of the Trust Board** | Jackie Arnold |
| **Signed:** | J Arnold |
| **Date:** | 1st July 2026 |
| **Chief Executive Officer** | Simon Laheney |
| **Signed:** | S.P. Laheney |
| **Date:** | 1st July 2026 |

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|---|---|
| **Policy Owner:** | Chief Operating Officer |
| **Implementation Date** | Summer 2026 |
| **Review Date:** | Summer 2027 |

## REVIEW SHEET

**The information in the table below details earlier versions of this document with a brief description of each review and how to distinguish amendments made since the previous version date (if any).**

| Version Number | Version Description | Date of Revision |
|---|---|---|
| 1 | Original – Adopted Key Model | Summer 2024 |
| 2 | No changes (minor name change) | Summer 2025 |
| 3 | Changes include:<br>○ Addition of “sexual harassment” as an example of whistleblowing<br>○ Broadened who can utilize the policy<br>○ Added section on anonymity<br>○ Added section on mixed complaints<br>○ Added response timelines<br>○ Added wellbeing support | Summer 2026 |

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## 1. 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
- 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)
- 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 and trustees. Other workers, including consultants, contractors, agency staff and those on work placements, are also encouraged to use it.

## 2. Legislation

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 also take into account the Public Interest Disclosure Act 1998.

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

## 3. Definition of whistle-blowing

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

- Criminal offences, such as fraud, bribery or corruption
- Pupils' or staff health and safety being put in danger and safeguarding
- Failure to comply with a legal obligation or statutory requirement. Non-compliance with DfE, ATH and other requirements.
- Sexual harassment (in effect from 6 April 2026)
- Breaches of financial management procedures
- 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. This policy can apply to others who are not employed by the trust, including trustees, governors, volunteers, visitors and suppliers

Not all concerns about the trust, or individual schools in the trust, count as whistle-blowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistle-blowing. 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 their line manager to decide the most appropriate reporting procedure.

When staff have a concern they should consider whether it would be better to follow our staff grievance or complaints procedures.

Protect (formerly Public Concern at Work) has:

- Further guidance on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure
- A free and confidential advice line

# 4. Procedure for staff to raise a whistle-blowing concern

## 4.1 When to raise a concern

Staff should consider the examples in section 3 when deciding whether their concern is of a whistle-blowing nature. Consider whether the incident(s) was illegal, breached statutory or trust procedures, put people in danger or was an attempt to cover any such activity up.

## 4.2 Who to report to

School-based staff should report their concern to the headteacher. If the concern is about the headteacher or CEO, 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 the Trust Board.

Central team staff should report their concern to the Chief Operating Officer (COO). If the concern is about the COO, or it is believed they may be involved in the wrongdoing in some way, the central team staff should report the concern to the chair of the Trust Board.

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

Contact details:

| Name | Role | Email Address |
|---|---|---|
| Simon Laheney | CEO | slaheney@furnesseducationtrust.co.uk |
| Amy Warner | Chief Operating Officer | awarner@furnesseducationtrust.co.uk |
| Jackie Arnold | Chair of Trust Board | jarnold@furnesseducationtrust.co.uk |

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 impossible if further information cannot be obtained from the staff member. This will also make it more difficult to establish whether any allegations are credible.

Staff who are concerned about possible reprisals if their identity is revealed should consult with the HR Manager or 1 of the contact points listed above, and appropriate measures can be taken to protect confidentiality where possible.

# 5. Trust procedure for responding to a whistle-blowing concern

## 5.1 Investigating the concern

When a concern is received by the headteacher – 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 or professional association representative
- Get as much detail as possible about the concern at this meeting,and record the information. If it becomes apparent the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure
- 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, local academy committee chair and/or chair of trustees, 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
- Within 5 working days– excluding periods of trust/school closure – of a concern being referred to the CEO /chair of trustees, they will write to the complainant to:
    - Acknowledge that the concern has been received
    - Indicate how the matter is to be dealt with
    - Give an estimate of how long it will take to provide a final response, informing the complainant as to whether any initial enquiries have been made
    - Tell the staff member whether further investigations will take place and if not, why not

Throughout any investigation, the trust will provide wellbeing check-ins for both the complainant and the subject(s) of a concern. Where appropriate, support and signposting to manage expectations, protect emotional wellbeing and maintain professional confidence will be offered.

## 5.2 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.

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.

If a staff member is not satisfied with the way in which their concern has been handled, they can raise their concerns with 1 of the contact points listed in section 4.3.

## 6. Malicious or vexatious allegations

Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made with the reasonable belief that the disclosure is in the public interest and meets the definition of whistle-blowing as listed in section 3 but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff 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.

## 7. Escalating concerns beyond the trust

The trust encourages staff to raise their concerns internally, in line with section 4 of this policy, but recognises that staff may feel the need to report concerns to an external body. A list of prescribed bodies to whom staff can raise concerns with is included here.

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

## 8. Approval

This policy will be reviewed every year.

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

## 9. Links with other policies

This policy links with our policies on:

- Staff grievance policy
- Complaints procedure
- Child protection policy
- Disciplinary policy