



**ALL SAINTS**  
Multi Academy Trust

# Whistleblowing Policy

Review Period	Two Yearly
Person Responsible for Policy	Director of People
Governing Committee	Finance & Staffing
Date of Trustees Approval	13.11.24
Date for Review	Nov 2026

## 1 Introduction

- 1.1 The Trust is committed to the highest possible standards of openness, probity and accountability. In line with this commitment the Trust expects all members of the Trust

community who have serious concerns about any aspect of the Trust's work to come forward and voice those concerns.

- 1.2 A person who raises a concern is protected by the Public Interest Disclosure Act 1998 which is incorporated into the Employment Rights Act 1996 as long as they have reasonable belief that the complaint is made in the public interest. This legislation protects workers from victimisation, discrimination or disadvantage when they voice legitimate concerns and their actions are not unlawful or contravene other forms of legislation.

## **2 Purpose**

- 2.1 The purpose of this policy and procedure is to ensure that individuals know how to raise a concern, feel confident in raising concerns and where concerns are raised, reassures them that the concern will be dealt with in confidence and they will be protected from victimisation, discrimination or disadvantage.
- 2.2 This policy and procedure does not cover matters which are covered by other existing procedures e.g. Grievance Procedure, Disciplinary Procedure, Dignity at Work Procedure, Complaints Procedure, Code of Conduct etc. This policy does not form part of your contract of employment and we reserve the right to amend or withdraw.

## **3 Scope**

- 3.1 This policy and procedure applies to:
- all employees who are employed by the Trust;
  - all members of the Trust Board and Local Academy Councils;
  - other individuals involved in providing services to the Trust including contractors, subcontractors, suppliers, volunteers; and
  - partner organisations.
- 3.2 This Policy and Procedure covers serious concerns such as;
- Conduct which is an offence or a breach of law
  - Failure to comply with a legal obligation
  - Child protection issues
  - Disclosure related to miscarriages of justice
  - Health and safety risks (including risks to the public as well as others of the Trust community) if reported and not acted upon
  - Damage to the environment
  - Unauthorised use of public funds
  - Possible fraud or corruption
  - Sexual, physical or other abuse of others
  - Other unethical conduct
  - Any attempt to prevent disclosure of the above

## **4 Principles**

- 4.1 No Individual will be subject to victimisation or other detriment by reporting concerns which they believe to be true.

- 4.2 Any concerns reported will be taken seriously and investigated.
- 4.3 Individuals are encouraged to raise concerns as soon as possible.
- 4.4 Disclosures made under this procedure will be treated seriously and sensitively, and where appropriate and possible, confidentially. Requests for anonymity, where made, will be considered, but there may be circumstances where anonymity cannot be granted, for example in relation to prosecutions or disciplinary investigations where the individual may be required to provide witness evidence.
- 4.5 Any person who is the subject of a whistleblowing allegation has legal rights which may be exercised and are independent of the Trust.
- 4.6 Any person raising a concern must have a reasonable belief that it is in the public interest, that there are reasonable grounds for the concern and will be expected to co-operate with any investigation.

Examples of public interest concerns are included at paragraph 3.2.

- 4.7 All employees have a duty of confidentiality to the Trust. Where employees make external disclosures of information to the press or other media, disciplinary action may be taken.
- 4.8 Employees may take legal action independent of the Trust. This includes the person who is the subject of the complaint, the complainant and the Trust.
- 4.9 It is not necessary for you to prove wrongdoing. However to be protected by whistleblowing laws against detrimental treatment or dismissal, you must reasonably believe that wrongdoing related to section 3.2 is being, has been, or is likely to be committed and that your disclosure is in the public interest.

## **WHISTLEBLOWING PROCEDURE**

### **5 Raising a concern**

- 5.1 If you have a genuine concern relating to any type of wrongdoing covered under this policy you should raise it with your Line Manager.
- 5.2 If the employee feels that the concerns involve the Line Manager they should speak to the Headteacher/Principal or Chief Executive Officer. If the concerns involve the Chief Executive Officer, Headteacher/Principal or a Governor, other than the Chair of the Local Academy Council, they should raise the concerns with the Chair of the Local Academy Council. If the concern involves the Chair of the Local Academy Council they should raise this with the Chair of the Trust Board. Any concerns regarding the Chair of the Trust board should be raised with the Vice-Chair of the Trust Board.
- 5.5 You can raise your concern orally or in writing, individuals should provide as much information as possible including:
- Details of the suspected wrongdoing.
  - The reason why they are particularly concerned about the situation
  - The names of any colleagues/employees who are considered to be either directly involved or who can help with further information
  - Any other background information, for example lists of documents, etc.

- What action (if any) you are seeking.
- 5.6 Concerns should, ideally, be raised in writing using our form {Form to raise a whistleblowing concern}.
- 5.7 All anonymous concerns will be treated seriously, however without contact details it may be difficult to clarify information, gain additional information or carry out an investigation.
- 5.8 In some cases it may be necessary to ask you to attend a meeting to clarify the nature of your concern. This will be arranged as soon as possible.

## **6 How the Trust will respond**

- 6.1 The action taken by the Trust will depend on the nature of the concern raised and will normally be investigated internally by the Trust. However, in appropriate cases the concerns may be referred to the local authority, a regulatory body or the Police in criminal matters.
- 6.2 In order to protect the whistle blower, those accused and the Trust, initial enquiries will be made by an appropriate member of senior management. The relevant manager will write to you confirming the outcome at this stage.
- 6.3 Concerns which fall within the scope of other procedures will normally be referred for consideration under those procedures.
- 6.4 The overriding principle which the Trust will have in mind is the public interest.
- 6.5 Concerns may be resolved by agreed action without the need for an investigation. If urgent action is required, this will be taken before any investigation is conducted.
- 6.6 The level of investigation and time this will take will vary depending on the nature of the suspected wrongdoing.
- 6.7 If an investigation is to be undertaken an appropriate investigating officer will be appointed, which may be the person who received the concern. Where the individual has provided contact details, an investigation interview should be undertaken unless not required by the whistleblower. The investigating officer will meet with the individual to gather as much information as possible. Where the complainant is an employee, they will be entitled to representation by a trade union representative or colleague. The investigating officer will inform the individual what steps will be taken and potential timescales for the investigation to be completed. If the matter does not fall under the whistleblowing policy, they will be informed how the matter will be taken forward.
- 6.8 The investigating officer may interview other relevant persons
- 6.9 Employees who are the subject of a whistleblowing concern which is being investigated, will be contacted by the Investigating Officer. A formal investigation will be carried out and the employee has a right to representation by a trade union representative or colleague. This is to ensure that the investigation is fair and open. The details of any concerns raised which are discovered to be untrue will not be kept on the employee's file.

- 6.10 Once the investigation is completed the investigating officer will consider all the evidence and make a recommendation to the Chair of the Local Academy Council and CEO, or in the case of Trust central staff to the CEO.
- 6.11 The Trust accepts that those raising concerns need to be assured that the matter has been properly addressed, therefore subject to legal constraints and confidentiality relating to other staff, information will be provided on the outcome of any investigation, to the whistle blower, as long as contact details have been provided.
- 6.12 Subject to legal constraints and confidentiality, information will be provided to the subject of the whistleblowing concern, on the outcome of any investigation and any recommendation, which may include implementation of other internal procedures.
- 6.13 A report of all whistleblowing complaints and outline of the outcomes of any investigations should be provided to the Trust Board.
- 6.14 The Trust hopes that all cases will be dealt with satisfactorily. If an individual feels that it is right to take the matter further they may refer to the table provided at the end of this section, which provides details of a number of relevant organisations.
- 6.15 Depending on the recommendations other internal processes and/or procedures may be implemented. The information gathered during the whistle blowing investigation can be used to support any other investigation under other procedures.

## **7 What to do if a concern is raised with you**

- 7.1 If you receive a concern under this procedure you need to act quickly and with the utmost discretion. All concerns must be evaluated objectively, reviewing the facts as they appear. If appropriate an investigating officer will be appointed.
- 7.2 In deciding how to progress the concern you should consider the following:
- The quality of the information provided and whether all relevant information has been provided or is available
  - Whether there is any corroborating evidence available, such as supporting documentation or testimony of another individual
  - Whether there are obvious motives that may have led to an accusation such as poor working relationships or the possibility of personal gain. There is also the possibility that a concern raised for the wrong reasons may also be true
  - An assessment of the seriousness of the concerns and the potential risks if they are correct or if they are not investigated
- 7.3 Where an allegation involves a member of staff the Investigating Officer/receiver of the complaint should liaise with the HR Department for advice and assistance with any investigations. Where an allegation involves the Trust HR the Investigating Officer should contact the Chief Executive Officer.
- 7.4 Depending on the seriousness of the concern and the amount of evidence available, management may wish to consider suspension of an employee in order that an investigation can be carried out unhindered or without further loss to Trust.

## **8 Making a disclosure outside the Trust**

- 8.1 The Trust would encourage an individual to raise a concern internally in order to deal with the matter and remove or reduce any risk. However, if an individual has raised a concern internally and feels that this has not been dealt with satisfactorily or feels that the concern needs to be raised directly with an external body, such as a regulator, you are advised to seek advice before reporting a concern externally. The independent whistleblowing charity, Protect, operates a confidential helpline to provide confidential advice, free of charge to anyone concerned about wrongdoing at work; telephone 020 3117 2520 or email <https://protect-advice.org.uk/>
- 8.2 The following list provides details of external organisations that you may wish to contact. Alternatively, you may wish to refer to the list of prescribed people and bodies contained within the document 'Blowing the Whistle to a prescribed Person' which can be found at the following web address: -

[Blowing the whistle to a prescribed person: list of prescribed persons and bodies \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

The Information Commissioner	The Office of the Information Commissioner Wycliffe House, Water Lane Wilmslow, Cheshire SK9 5AF 0303 123 1113 <a href="mailto:casework@ico.gsi.gov.uk">casework@ico.gsi.gov.uk</a>
DJH Mitten Clarke(External Auditor of the Trust)	Festival Way Festival Park Stoke on Trent Staffordshire ST1 5SQ
Merseyside Police	Merseyside Police HQ Cazneau Street Liverpool L3 3AN
The Environment Agency	National Customer Contact Centre PO Box 544 Rotherham S60 1BY 03708 506 506 <a href="mailto:enquiries@environment-agency.gov.uk">enquiries@environment-agency.gov.uk</a>

Health and Safety Executive	Redgrave Court Merton Road Bootle L20 7HS 0845 300 9923
HM Customs and Excise	Stephenson House 7-10 The Grove Gravesend DA12 1DR 0845 300 0622
Protect	Protect The Green House 244-254 Cambridge Heath Road London E2 9DA
Liverpool Archdiocese	LACE Croxteth Drive Sefton Park Liverpool L17 1AA 0151 522 1000
Diocese of Liverpool	St James' House 20 St James' Road Liverpool L1 7BY 0151 709 9722

## 9 Malicious Allegations

- 9.1 If an employee raises a concern in good faith which they believe is in the public interest, but is not confirmed by the investigation, then no action will be taken against them.
- 9.2 If an employee raises a concern that is not in the public interest, which, after investigation, turns out to be untrue, then the matter may be considered under the Trusts Disciplinary Procedure and disciplinary action may be taken.

## 10 Appeal

10.1 If you are not satisfied with how your concern has been dealt with, you should appeal to the Chief Executive Officer.

You can raise your appeal orally, or in writing. It is important you set out clearly the grounds for your appeal, i.e. the basis on which you consider that your original concern has not been satisfactorily dealt with.

10.2 In some cases it may be necessary to ask you to attend a meeting to clarify the nature of your appeal. This will be arranged as soon as possible.

10.3 The relevant manager will consider your grounds for appeal and review the manner in which your original whistleblowing concern was handled.

10.4 You will be informed in writing of the outcome of your appeal as quickly as possible.

## 11. Confidentiality and anonymity

11.1 We want you to feel comfortable raising a whistleblowing concern openly and actively encourage you to do so. Where you raise a whistleblowing concern openly, we will maintain your confidentiality as far as possible. If we need to identify your identity to anyone we will inform you beforehand.

11.2 We encourage anonymous reporting over remaining silent. Although we investigate any concern that is reported anonymously as best we can, anonymous reports are likely to be more difficult for us to investigate and we will not be able to provide you with feedback.

## 12 Our Commitment to you

12.1 You have the right to not to be subjected to any detrimental treatment including being unfairly penalised, disciplined or dismissed because you have raised a whistleblowing concern.

12.2 If you raise a whistleblowing concern in accordance with this policy, we will ensure that you are treated with respect and provided with adequate support and protection.

12.3 If you are told not to raise or pursue a whistleblowing concern, or you believe that you have been subjected to detrimental treatment because you have raised a whistleblowing concern, you should report the matter to the Director of People. In the alternative you can raise it under our Grievance procedure if it applies to you. Any such behaviour will not be tolerated and will be treated as a disciplinary offence.



### Appendix 1: Form to raise a whistleblowing complaint

This form is intended for use by any individual working in the Trust including contractors, workers and volunteers who wish to raise a concern about wrongdoing.

This form should be used to report wrongdoing within the Trust that you believe is in the public interest.

If your concern relates to a personal complaint that is not in the public interest for example an allegation of bullying, you should raise this under the grievance procedure. If you are unsure about whether your concerns are best dealt with under whistleblowing please speak to the HR department for further advice.

This form should be completed and sent to your Line Manager marked confidential. If your concern relates to your line manager, or for any reason you do not wish to approach your line manager please send to HR at [HR@Allsaintsmat.org](mailto:HR@Allsaintsmat.org) marked confidential.

Once you have submitted your form, we will invoke the procedure set out in the whistleblowing policy. We will respect your wish for confidentiality as far as this is possible.

#### Formal whistleblowing concern

Name:	
Job title:	
Department/ Organisation	

**Summary of concerns:**

<p>Please set out your concern with as much detail as possible, including date, time, location, the identity of those involved in the wrongdoing and details of any witnesses. You may attach additional sheets if required.</p>			
<p><b>Nature of your concern:</b></p> <p>Please specify if your concern is about a potential criminal offence; failure to comply with a legal obligation; miscarriage of justice; risk to health and safety; damage to the environment or an attempt to cover up any of these.</p>			
<p><b>Outcome requested:</b></p> <p>Please set out how you would like to see the issue dealt with, and why and how you believe that this will resolve the issue.</p>			
<p><b>Declaration:</b></p> <p>I can confirm that the above statements are true to the best of my knowledge, information and belief. In understand that, if I knowingly make any false allegations, this may result in disciplinary action being taken against me by the organisation.</p>			
Form completed by:			
Signature:			
<p><b>For completion by the Trust:</b></p>			
Date received		Name and job of recipient:	