Confidential Reporting /Whistleblowing Policy 2026-2028

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Trust website		School website	
1	Statutory publication	A	Statutory publication
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**Policy level			
1	Trust wide	Single policy relevant to everyone and consistently applied across all schools and departments, with no variation. e.g. Complaints procedure	Statutory policies approved by the Board of Trustees (or designated Trustee Committee). Non-statutory policies approved by the CEO with exception of Executive Pay.
2	Trust core values	This policy defines the Trust core values in the form of a Trust statement to be incorporated fully into all other policies on this subject, that in addition contain relevant information, procedures and or processes contextualised to that school. e.g. Safeguarding, Behaviour	Statements in statutory policies approved by the Board of Trustees (or designated Trustee Committee). Statements in non-statutory polices approved by the CEO. Policy approved by Local School Board.
3	School/department	These policies/procedures are defined independently by schools as appropriate. E.g. Anti-bullying	Approved by Local School Board.

Changes in this version
Addition of point 1.4

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1.0 Introduction

1.1 The Trust is committed to conducting its business with honesty and integrity and expects all employees to maintain high standards in accordance with their contractual obligations and the Trust's policies and procedures.

1.2 As a Trust we are a pathfinder organisation and subscribe to the Ethical Leadership principles of selflessness, integrity, objectivity, accountability, openness, honesty and leadership. Leaders should show leadership through the personal characteristics or virtues of trust, wisdom, kindness, justice, service, courage and optimism.

1.3 However, the Trust recognises that there may be occasions when behaviours or practices are unacceptable, and this policy enables employees to disclose their concerns of serious wrongdoing without fear of reprisal. This policy sets out the way in which individuals may raise any concerns that they have confidentially, and a transparent method of how these concerns will be dealt with. This process is commonly referred to as "whistleblowing".

1.4 Employees are expected to ensure that any reports made under this policy are, to the best of their knowledge, truthful and accurate. Raising concerns maliciously, or for personal gain, undermines the integrity of this policy and will be addressed through the appropriate internal procedures.

2.0 Scope

2.1 This policy supersedes all existing policies previously in operation and is not contractual. The Employer (The Alliance Schools Trust) is identified as 'the Trust' within this Policy.

2.2 For avoidance of doubt and to ensure clarity the term 'employee' will be used throughout this policy when referring to all individuals working for the Trust.

2.3 References to the Headteacher is a generic term that encompasses the roles of Headteacher, Head of School, Executive Headteacher and Education Director. Shared Services staff may refer to their Line Manager.

2.4 Where the School is referred to, academy may apply.

2.5 This policy does not form part of an employee's contract of employment. The Trust reserves the right to amend its content at any time including variations for timescales to action.

2.6 This policy incorporates the provisions that are required from the Public Interest Disclosure Act 1998 (including updates effective from June 2025) to enable employees to disclose their concerns in accordance with the Act's provisions and to protect employees making disclosures about certain matters.

2.7 The policy and procedure set out in this document aims to:

- 2.7.1 encourage and enable employees to feel confident in disclosing serious concerns internally and to question and act upon concerns about unacceptable behaviour or practice within the Trust
- 2.7.2 establish a fair and thorough investigative procedure
- 2.7.3 establish a procedure for employees to disclose concerns and to receive a response
- 2.7.4 provide employees with an awareness of how to pursue concerns if they are not satisfied with the response
- 2.7.5 reassure employees that they will be protected from possible reprisals or victimisation, if they have a reasonable belief that they have made any a qualifying disclosure in good faith and in the public interest.

3.0 Principles

3.1 This policy and procedure cannot be used to raise concerns relating to employment matters where more appropriate procedures are available and where there is no public interest element.

3.2 Any matter raised under this policy will be investigated and the outcome of the investigation reported back to the employee who raised the issue.

3.3 An employee who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because he/she has made a disclosure.

3.4 Victimisation of a worker for raising a qualified disclosure will be a disciplinary offence.

3.5 If misconduct is discovered as a result of any investigation under this procedure, the Trust's Disciplinary Policy and Procedure will be used in addition to any appropriate external measures.

3.6 If told not to raise or pursue any concern, even by a person in authority such as a manager, employees should not agree to remain silent. They should report the matter to the Headteacher of the School in which they are employed. If the matter is in relation to the Headteacher, the employee should report to the Chair of the Local School Board. If the matter is in relation to the CEO of the Trust, the employee should report to the Chair of Trustees.

4.0 Definition

4.1 Whistleblowing is the disclosing of a concern within the workplace that has come to the attention of an employee during the course of their work about a danger, a risk, malpractice or wrongdoing which affects others and is in the public interest.

4.2 The law provides protection for employees who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by an employee who has a reasonable belief that:

4.2.1 a criminal offence

4.2.2 a miscarriage of justice

4.2.3 an act creating risk to health and safety

4.2.4 an act causing damage to the environment

4.2.5 a breach of any other legal obligation

4.2.6 concealment of any of the above

is being, has been, or is likely to be, committed. It is not necessary to have proof that such an act is being, has been, or is likely to be, committed – a reasonable belief is sufficient.

5.0 Safeguards

5.1 The Trust recognises that the decision to report concern can be a difficult one to make, not least because of the fear of reprisals from those who may be guilty of malpractice or from the Trust as a whole.

5.2 The Trust will not tolerate any harassment or victimisation (including informal pressures). The Trust will take appropriate action in order to protect a person who raises protected disclosure.

6.0 Confidentiality

6.1 All concerns will be treated in confidence, and every effort will be made not to reveal the identity if that is the wish of the individual. However, it must be appreciated that any investigation process may reveal the source of the information and that the individual may need to come forward as a witness and provide a statement, as part of the evidence or to pursue the complaint.

7.0 Disclosing a Whistleblowing Concern

7.1 The employee should disclose their concern to their Leadership Line Manager or the Headteacher of the School for whom they work, either orally or in writing, as soon as possible. If the concern is put in writing the employee should include:

- 7.1.1 the background, history and detail of their concern
- 7.1.2 names, dates and places where possible
- 7.1.3 the reason why they are concerned about the situation.

7.2 If the employee believes that a member of the Leadership Team is involved in the matter of concern, they should disclose their concern directly to the Headteacher of the School.

7.3 Where the Headteacher is implicated by the concern and the employee feels unable to disclose the concern within the school within which they work, they should contact the Chair of the Local School Board.

7.4 If the employee does not feel they are able to contact the Chair of the Local School Board, they can write to CEO of the Trust.

7.5 Although an individual is not expected to prove the truth of an allegation that is made, it will be necessary to demonstrate to the person contacted that there are reasonable grounds for concern.

7.6 Staff may invite their trade union representative or work colleague to be present during any meetings or interviews in connection with the concerns they have raised.

7.7 Non-employees should raise a concern in the first instance with their contact within the School, usually the person to whom they report.

7.8 Advice and guidance on how specific matters of concern may be pursued can be obtained internally from the Headteacher or Human Resources.

8.0 How the Trust will Respond

8.1 The action taken by the Trust will depend on the nature of the concern. Where appropriate, the matters raised may:

- 8.1.1 be investigated by management, internal audit, or through the disciplinary process
- 8.1.2 appoint an independent person to investigate the concern
- 8.1.3 be referred to the external auditor
- 8.1.4 be referred to the police
- 8.1.5 report the concern to the DfE
- 8.1.6 any combination of the above.

8.2 The person who receives the concern will make initial enquiries seeking to establish the facts of the matter and assess whether the concern meets the definition of whistleblowing and therefore should be formally investigated. Concerns or allegations, which fall within the

scope of specific procedures (for example, child protection or discrimination issues), will normally be referred for consideration under those procedures.

8.3 It should be noted that some concerns may be resolved by agreed action without the need for investigation. Equally, some issues may be investigated without the need for initial enquiries. If urgent action were required, this would be taken before any investigation is conducted.

8.4 Where an investigation is required the Headteacher, Chair of the Local School Board or the CEO, **will appoint an Investigating Officer.** Within **ten working days** of a qualifying disclosure being raised, the Investigating Officer will write to the employee (if they have disclosed their identity).

8.4.1 acknowledging that the concern has been received

8.4.2 indicating how it proposes to deal with this matter

8.4.3 giving an estimate of how long it will take to provide a final response

8.4.4 informing the person whether any initial enquiries have been made

8.4.5 supplying the person with information on staff support mechanisms

8.4.6 telling the person whether further investigations will take place and, if not, why not.

8.5 The Investigating Officer will then carry out a thorough investigation in order to obtain all the relevant facts and will not make any assumptions. This will involve taking a comprehensive record of any meetings that occur and obtaining relevant documentary evidence.

8.6 As part of the investigation further information may be sought from the employee disclosing the concern. Where any meeting is arranged, the employee has the right, if they so wish, to be accompanied by a union or professional association representative or a work colleague who is not involved in the area of work to which the concern relates.

8.6.1 The Investigating Officer will give careful consideration to the time and location of the meeting and how these arrangements are communicated to the employee.

8.6.2 The employee and their companion must respect the need to maintain confidentiality.

8.7 At the conclusion of the investigation the Investigating Officer will provide a report containing the findings and make recommendations to the Headteacher, Chair of the Local School Board or the CEO as appropriate for consideration and implementation.

8.8 The Investigating Officer will then confirm in writing to the employee who disclosed the concern information about the outcome of the investigation unless this is not possible for legal reasons.

8.9 If referred to the Police, an internal investigation may be delayed pending the outcome of the Police Investigation.

8.10 The Trust will take appropriate steps to minimise any difficulties, which a member of staff may experience as a result of raising a qualifying disclosure.

8.11 The Trust accepts that an individual who raises a qualifying disclosure needs to be assured that the matter has been properly addressed. Thus, subject to legal constraints, the person raising the qualifying disclosure will receive as much information as possible as the investigation progresses.

9.0 Taking the Disclosure further

9.1 If the employee is not satisfied with how their concern has been investigated or with the outcome, or feel it is right to take matters outside the Trust, they are permitted to disclose

their concerns externally. The Trust would rather an employee disclose a concern with the prescribed external body/appropriate regulator than not disclose it at all.

9.2 Employees are recommended to contact the external bodies below for advice before taking the matter further or referring external in the first instance:

9.2.1 their trade union

9.2.2 the independent charity Public Concern at Work

9.2.3 the Citizens Advice Bureau.

9.3 Employees can disclose concerns externally with a prescribed person or body, the list of these can be found at http://www.gov.uk. Employees can only disclose to a prescribed person/body provided that:

9.3.1 they make a disclosure with the reasonable belief that it is in the public interest

9.3.2 they reasonably believe that the information disclosed, and the concern contained is substantially true

9.3.3 they do not make the disclosure for personal gain.

9.4 It is important that disclosures are not made directly to the media but are directed internally or externally through this policy and procedure. Failure to do so may result in the exposure of confidential information which could lead to the employee making the disclosure being subject to disciplinary action.

9.5 This policy is intended to provide individuals with an avenue to raise qualifying disclosures within the Trust. However, if an individual is dissatisfied with the Trust's response, she or he can raise the matter with the designated Auditor:

MHA
201 Silbury Blvd, Milton Keynes, MK9 1LZ
01908 662255

9.6 In taking a matter of concern outside the Trust, staff should ensure that, so far as possible, it is raised without confidential information being divulged and would, other than in exceptional circumstances, be expected to have exhausted ~~the~~ all internal routes available first.

10.0 Protection for Whistle-blowers

10.1 If an employee makes a disclosure and they have a reasonable belief that the concerns is real, the employee will not suffer any detriment, even if after investigation it is concluded that the concern is unfounded.

10.2 If an employee believes that they are suffering a detriment for having disclosed a concern they should report this immediately either verbally or in writing to the Chair of the Board of Trustees. The Chair of the Board of Trustees will appoint an appropriate person to investigate this allegation.

11.0 Confidentiality

11.1 The Trust recognises employees may want to disclose a concern in confidence. If confidentiality is requested, all reasonable efforts will be made to avoid revealing the employee's identity, unless disclosure is a requirement of law.

11.2 It may not be possible to keep an employee's identity confidential whilst carrying out an investigation and they may need to be identified as a witness at an appropriate time. If it becomes necessary to reveal the employee's identity the Investigating Officer will inform the employee in writing prior to completing the investigation report. The employee will also be informed of the reasons why it is necessary to identify them.

12.0 Anonymous Allegations

12.1 Employees are encouraged to put their name to their disclosure. Concerns expressed anonymously are less powerful and more difficult to investigate. However, they may be considered at the discretion of the Chair of the Local School Board. In exercising this discretion, the factors to be taken into account will include:

12.1.1 The seriousness of the concerns disclosed

12.1.2 The credibility of the concerns

12.1.3 The evidence base

12.1.4 The difficulty of the investigation

12.1.5 The likelihood of confirming the concerns from other named sources.

12.2 Anonymous allegations, if taken forward, will be investigated by following the steps outlined in the above procedure.

13.0 Untrue and Malicious Allegations

13.1 If an employee makes a disclosure in the reasonable belief that it is in the public interest (in good faith), but the concern has not proven by the investigation, no action will be taken against the employee.

13.2 However, if there are clear grounds that the employee may have made a malicious or vexatious disclosure, this will be taken seriously, and appropriate action may be taken against the employee.

13.3 If the Investigating Officer believes that the disclosure is malicious or vexatious, they will include this in their report and the Headteacher, Chair of the Local School Board/Trustees or the CEO will determine what, if any, appropriate action is to be taken.