



The Athelstan Trust

Whistleblowing Policy

Date of Review	Approved by	Date of Approval	Next Review Date	Website
Nov 2022, Nov 2025	Board	11 th December 2025	December 2028	Y

1. Honesty and integrity

The Trust is committed to conducting its business with honesty and integrity, and we expect all staff to maintain high standards in accordance with the Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring and to address them when they do occur.

2. Aims

The aims of this policy are to:

- encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, 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 this Policy, reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue).

3. 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 whistleblowing. We also take into account the Public Interest Disclosure Act 1998. This Policy complies with our funding agreement and Articles of Association.

4. Responsibilities

Board of Trustees - the Board of Trustees has overall responsibility for the effective operation of this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy. The Board are responsible for reviewing this Policy at least annually.

Whistleblowing Officer – the Company Secretary is the Whistleblowing Officer and has day-to-day operational responsibility for this policy, and you should refer any questions about this policy to them in the first instance.

All Staff - All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Whistleblowing Officer who will involve the Board where appropriate.



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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):

- a. Criminal offences such as fraud or corruption
- b. Student or staff health and safety being put in danger
- c. Failure to comply with any legal obligation or regulatory requirements
- d. Miscarriages of justice
- e. Breaches of financial management procedures
- f. Bribery
- g. Breach of our internal policies and procedures, including our code of conduct
- h. Conduct likely to damage our reputation or financial wellbeing
- i. Unauthorised disclosure of confidential information
- j. Negligence
- k. Attempts to cover up the above, or any other wrongdoing in the public interest
- l. Damage to the environment.

A whistleblower is a person who raises a genuine concern relating to any of the above. This policy covers all employees, officers, governors, trustees, consultants, contractors, self-employed contractors, volunteers, work placement students / interns, casual workers and agency workers. This policy does not form part of any employee's contract of employment and may be amended at any time. If you have any genuine concern related to suspected wrongdoing or danger affecting any of our activities and such disclosure is in the public interest (a **whistleblowing concern**) you should report it under this policy.

Not all concerns about 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 to be a grievance.

When staff have a concern, they should consider whether it would be better to follow the Trust's grievance or complaints procedure.

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](#)

Advice is also available from [the NSPCC Whistleblowing advice line](#) and the [Government Modern Slavery helpline](#).

If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Officer.

6. Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage staff to make disclosures anonymously, although we will make every effort to investigate anonymous disclosures. You should be aware that proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about reprisals if their identity is revealed should come forward to the Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Protect, as per the details given above.



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7. Raising a concern – guidance for staff

School-based staff should report their concern to the Headteacher. 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 Whistleblowing Officer (see section 4 of this Policy).

Central team staff should report their concern to the CEO. If the concern is about the CEO, or it is believed they may be involved in the wrongdoing in some way, the central team staff should report the concern to the Whistleblowing Officer (see section 4 of this Policy).

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.

8. Responding to a whistleblowing concern – Trust process

8.1 Investigation of the concern

When a concern is received by the Headteacher / CEO / Designated Trustee– 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, Chair of Governors 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

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 / regulator, such as the local authority, HSE, Environment Agency, Information Commissioner 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 deal with concerns fairly and in an appropriate way.



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9. Malicious or Vexatious allegations

Staff 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 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.

10. Escalating Concerns beyond the Trust

The trust encourages staff to raise their concerns internally, in line with section 7 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 can be found on the Government website: [Whistleblowing: list of prescribed people and bodies - GOV.UK](#)

The Protect advice line, linked to in section 5 of this policy, can also help staff when deciding whether to raise the concern to an external party.

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline (details above).

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a parent, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first, in line with this policy.

11. Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer or the Headteacher immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

12. Approval

This policy will be reviewed annually by the Board of Trustees.

13. Links with other policies

This policy links with our policies on:

- Grievance policy
- Complaints policy
- Disciplinary Procedure
- Child protection and safeguarding policy