

Whistleblowing Policy

Policy Code:	HR23
Policy Start Date:	September 2025
Policy Review Date:	September 2027

Please read this policy in conjunction with the policies listed below:

- F3 Anti-Fraud, Corruption & Bribery Policy
- HR6 Data Protection Policy
- HR6A Data Breach Policy
- HR3 Grievance Policy
- HR12 Staff Disciplinary Policy
- HR24 Allegations of Abuse Made Against Adults Policy
- HR36 Complaints Policy
- HR41 Staff Anti-Bullying and Harassment Policy
- HR42 Low-Level Complaints
- SW5 Safeguarding and Child Protection Policy
- SW17 Safeguarding Adults

1 Policy Statement

- 1.1 The Priory Federation of Academies Trust (the Trust) seeks to run all aspects of school business and activity with full regard for high standards of conduct and integrity. 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 in order to prevent such situations occurring and to address them when they do occur.
- 1.2 References to the Trust or Academy within this policy specifically include all primary, secondary and special academies within the Trust, as well as the Early Years setting at the Priory Witham Academy, Priory Apprenticeships and Lincolnshire SCITT.
- 1.3 This policy covers all members of staff, consultants, contractors, volunteers, casual workers and agency workers.
- 1.4 This policy does not form part of any member of staff's contract of employment and it may be amended at any time.
- 1.5 This policy takes account of the Whistleblowing Arrangements Code of Practice in collaboration with the British Standards Institute and Public Concern at Work.

2 Roles, Responsibilities and Implementation

- 2.1 The Pay, Performance and HR Committee has overall responsibility for the effective operation of this policy, for ensuring compliance with the relevant statutory framework and for reviewing the effectiveness of actions taken in response to concerns raised under this policy. This committee delegates day-to-day responsibility for operating the policy and ensuring its maintenance and review to the Head of Human Resources.
- 2.2 Leaders and Managers have a specific responsibility to ensure the fair application of this policy and all members of staff are responsible for supporting colleagues and ensuring its success.

3 Aims

- 3.1 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.
- 3.2 To provide staff with guidance as to how to raise those concerns.
- 3.3 To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

4 What is whistleblowing?

4.1 **Whistleblowing** is the disclosure of information that relates to suspected wrongdoing or dangers at work. The law provides protection for workers who raise legitimate concerns about specified matters or 'qualifying disclosures'. A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that there are wrongdoing or dangers at work.

This may include:

- criminal activity;
- Sexual harassment;
- failure to comply with any legal or professional obligation or regulatory requirements;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment
- bribery;
- financial fraud or mismanagement;
- negligence;
- breach of the Trust's internal policies and procedures, including HR29 Code of Conduct;
- conduct likely to damage the Trust's reputation;
- unauthorised disclosure of confidential information;
- unethical behaviour;
- inappropriate use of school assets or funds; and/or
- the deliberate concealment of any of the above matters.

This list is not exhaustive.

4.2 A **whistleblower** is a person who raises a genuine concern relating to any of the above. If a member of staff has any genuine concerns related to suspected wrongdoing or danger affecting any of the Trust's activities (a **whistleblowing concern**), they should report it under this policy.

4.3 This policy should not be used for complaints relating to a member of staff's own personal circumstances, such as the way they have been treated at work. In such cases, they should use the Trust's HR3 Grievance Policy or HR36 Complaints Policy.

4.4 If a member of staff is uncertain whether something is within the scope of this policy, they should seek advice from the Head of Human Resources (whose contact details are set out in Section 11).

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- 4.5 If a member of staff's concern is in relation to safeguarding and the welfare of the Trust's pupils, they should consider whether the matter is better raised under SW5 Safeguarding & Child Protection Policy (or SW17 Safeguarding Adults Policy) and in accordance with the arrangements for reporting such concerns, although the principles set out in this policy may still apply.

5 Raising a Whistleblowing Concern

- 5.1 Members of staff should be able to discuss any concerns about wrongdoings or dangers at work as part of the normal professional interaction between them and their line manager and, in many cases, these will be dealt with to mutual satisfaction. Alternatively, a member of staff may wish to raise any concerns with their line manager more formally, either in person or in writing. The line manager may be able to agree a way of resolving the concern quickly and effectively. In some cases, they may refer the matter to the Head of Human Resources. For full contact details, please see Section 11.
- 5.2 However, where the matter is more serious, or the member of staff feels that their line manager has not addressed their concern, or they prefer not to raise it with them for any reason, they should contact the Head of Human Resources.
- 5.3 In instances where a concern involves the Head of Human Resources, or a member of the HR department, the member of staff should contact the Clerk to the Trust (whose contact details are set out in Section 11). The Clerk to the Trust will make arrangements for an assessment (paragraph 8.1) and, if necessary, investigation (paragraph 8.2) of the concern by a Trustee.
- 5.4 In instances where a concern involves a member of the Trust's senior executive team, the member of staff should contact the Clerk to the Trust (whose contact details are set out in Section 11). The Clerk to the Trust will make arrangements for an assessment (paragraph 8.1) and, if necessary, investigation (paragraph 8.2) of the concern by a Trustee.
- 5.5 The Trust representative will arrange a meeting with the member of staff as soon as possible to discuss their concern, ideally within 10 working days of receipt of the concern being raised. The member of staff may bring a colleague to any meetings under this policy. The companion must respect the confidentiality of the disclosure and any subsequent investigation.
- 5.6 The Trust representative will take down a written summary of the concern and provide the member of staff with a copy after the meeting. The Trust will also aim to provide an indication of how it proposes to deal with the matter.

6 Confidentiality

- 6.1 The Trust hopes that staff will feel able to voice whistleblowing concerns openly under this policy. However, if a member of staff wants to raise a concern

confidentially, the Trust will make every effort to conceal their identity. If it is necessary for anyone investigating the concern to know the member of staff's identity, the Trust will discuss this with the member of staff first.

6.2 The Trust does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if it cannot obtain further information. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should approach the Head of Human Resources and appropriate measures can then be taken to preserve confidentiality. If the member of staff is in any doubt, advice is available from Protect, the independent whistleblowing charity, which offers a confidential helpline. Their contact details can be found in Section 11.

6.3 Where the Trust receives an anonymous complaint, it will investigate the complaint as far as is reasonable, taking into account:

- the seriousness of the issue raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from other sources.

6.4 As part of the application of this policy, the Trust may collect, process and store personal data in accordance with HR6 Data Protection Policy. We will comply with the requirements of the Data Protection Act (2018) and UK-GDPR and any implementing laws, regulations and secondary legislation, as amended or updated from time to time in the collecting, holding and sharing of information in relation to our workforce. Records will be kept in line with HR33 Records Management Policy.

7 External disclosures

7.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases a member of staff should not find it necessary to alert anyone externally.

7.2 The law recognises that in some circumstances it may be appropriate for a member of staff to report their concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage staff to seek advice before reporting a concern to anyone external. Protect holds a list of prescribed regulators for reporting certain types of concern. Their contact details can be found in Section 11. Alternatively, the list is available from the [Department for Business, Energy & Industrial Strategy](#).

7.3 Whistleblowing concerns usually relate to the conduct of Trust staff, but they may sometimes relate to the actions of a third party, such as a contractor, supplier or service provider. In some circumstances the law will protect staff if they raise a concern with the third party directly where they reasonably believe

it relates mainly to their actions or something that is legally their responsibility. However, staff are encouraged to report such concerns internally first. Staff should contact their line manager or one of the other individuals set out in paragraph 5.2 for guidance.

8 Investigation and Outcome

- 8.1 Once a member of staff has raised a concern, the Trust will carry out an initial assessment to determine the scope of any investigation. The Trust will inform the member of staff of the outcome of the assessment. The member of staff may be required to attend additional meetings in order to provide further information.
- 8.2 In some cases, the Trust may appoint an investigator or team of investigators, including staff with relevant experience of investigations or specialist knowledge of the subject matter. The Trust may, in some circumstances, appoint an external person or body to investigate the concern. The investigator(s) will collate findings on the matter and may make recommendations for change to enable the Trust to minimise the risk of future wrongdoing.
- 8.3 The Trust will aim to keep the member of staff informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the Trust giving specific details of the investigation or any disciplinary action taken as a result. The member of staff should treat any information about the investigation as confidential.
- 8.4 If the Trust concludes that a whistleblower has made false accusations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action in line with HR12 Staff Disciplinary Policy.

9 After an Investigation

- 9.1 While the Trust cannot guarantee the outcome a member of staff may be seeking, it will deal with concerns fairly and in an appropriate way. By using this policy, members of staff can help the Trust to achieve this.
- 9.2 If a member of staff has genuine concerns about how the Trust has handled their whistleblowing disclosure, they can write to the Clerk to the Trust. The Clerk may investigate whether this policy's procedures have been followed in the case in question and notify the member of staff of their findings accordingly. The Clerk may ask for another assessment (paragraph 8.1) to take place but does not have the power to re-investigate the original complaint/disclosure.
- 9.3 Should the whistleblower remain dissatisfied with the handling of their disclosure, they also have the freedom to report their concern directly to the Chair of the Trust or the Trust's Audit Committee. The Chair of the Trust

has the power to review the case paperwork and issue a final ruling or recommendation, as appropriate.

- 9.4 In some cases, following investigation the Trust may carry out a lessons learnt exercise to support with ongoing practices and any outcomes identified as part of the investigation.

10 Protection and Support for Whistleblowers

- 10.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. The Trust aims to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 10.2 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 a member of staff believes that they have suffered any such treatment, they should inform the Head of Human Resources immediately. If the matter is not remedied, they should raise it formally using the Trust's HR3 Grievance Policy or HR36 Complaints Policy.
- 10.3 In instances where an allegation of such treatment involves the Head of Human Resources, or a member of the HR department, the member of staff should raise it with the Clerk to the Trustees.
- 10.4 Members of staff must not threaten or retaliate against whistleblowers in any way. Any member of staff involved in such conduct may be subject to disciplinary action in line with HR12 Staff Disciplinary Policy.
- 10.5 Support is available to whistleblowers who raise concerns under this policy through Education Support.

11 Contacts

Head of Human Resources	Hannah Eves 01522 871370 heves@prioryacademies.co.uk
Clerk to the Trust	Martin Mammatt 01522 871370 mmammatt@prioryacademies.co.uk
Trustee responsible for Whistleblowing	Kate Beardmore 01522 871370
Protect (Independent whistleblowing charity)	Helpline: 0203 117 2520 Website: www.protect-advice.org.uk

NSPCC Whistleblowing Advice Line	0800 028 0285
Education Support	08000 562 561

12 Training

- 12.1 The Trust provide appropriate training to all staff in relation to whistleblowing through various sources, these include annual safeguarding updates and the Trusts Equality, Diversity and Inclusion training.

13 Policy Change

- 13.1 This policy may only be amended or withdrawn by The Priory Federation of Academies Trust.



The Priory Federation of Academies Trust

Whistleblowing Policy

This Policy has been approved by the Pay, Performance and HR Committee:

Signed..... Name..... Date:

Trustee

Signed..... Name..... Date:

Chief Executive Officer

Signed..... Name..... Date:

Designated Member of Staff

Please note that a signed copy of this agreement is available via Human Resources.