'They will soar on wings like eagles …'

Isaiah 40:31

collaborate | enrich | trust | innovate | aspire | nurture

AQUILA Diocese of Canterbury Academies Trust

Multi Academy Trust Policy

Common Trust Policy, Use as Published

Whistleblowing Policy 2025-26

Date of Review: September 2025

Date of next Review: Sept 2026

Version	Date	Author	Change Description
	09.2025	AW	No Change
1.1	11.2025	TH	Chair of Audit & Risk Committee updated

WHISTLEBLOWING POLICY

We are committed to conducting our operations with honesty and integrity, and expect all employees, local governors, Trustees, officers and suppliers to maintain high standards. 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 or to address them when they do occur.

The purpose of this policy is to make clear that employees can and should voice concerns without fear of victimisation, subsequent discrimination or disadvantage. It is intended that this policy will encourage and enable employees to raise serious concerns within the school and the Multi Academy Trust rather than overlooking a problem or 'whistleblowing' outside the organisation.

This policy is effective from 1st October 2015 as approved by Aquila the Diocese of Canterbury Multi Academies Trust Ltd (hereafter referred to as the MAT). It is updated annually and is included within the Staff Handbook as well as being published as a stand alone policy.

The aims of this policy are:

- To encourage Employees, Local Governors, Trustees, Officers and suppliers to act upon their concerns and report any matter where they 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;
- To provide Employees, Local Governors, Trustees, Officers and suppliers with guidance as to how to raise those concerns;
- To reassure Employees, Local Governors, Trustees, Officers and suppliers that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- To ensure that employees about whom concerns are raised are treated fairly and supported appropriately

This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and **Public Concern at Work** (the independent whistleblowing charity) and the revisions to the law introduced by the Enterprise and Regulatory Reform Act 2013 from 25 June 2013.

The ESFA's Academy Trust Handbook contains the following provisions:

Having a procedure
2.43 The academy trust must have procedures for whistleblowing, to protect staff who report individuals they believe are doing something wrong or illegal.
2.44 The trustees must agree the whistleblowing procedure and publish it on the trust's website.
2.45 The trust should appoint at least one trustee and one member of staff who other staff can contact to report concerns.
Informing staff
2.46 The trust must ensure all staff are aware of the whistleblowing process, and how concerns will be managed.
2.47 Staff should know what protection is available to them if they report someone, what areas of malpractice or wrongdoing are covered in the trust's whistleblowing procedure, and who they can approach to report a concern.
2.48 The trust must ensure all concerns raised with them by whistleblowers are responded to properly and fairly.

The following persons hold the following roles:

- ***Accounting Officer: Annie Wiles***
- ***Chief Finance Officer: Marian Scally***
- ***Chair of Audit & Risk Committee: Bev Tillman***
- ***Senior Independent Trustee: Elaine Rose***

SCOPE

This policy applies to all individuals working at all levels including senior managers, officers, Trustees, employees, consultants, contractors, trainees, local governors, part-time and fixed- term workers, casual and agency staff and volunteers (collectively referred to as staff in this policy).

WHAT IS WHISTLEBLOWING?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- failure to comply with any legal or professional obligation or regulatory requirements;
- bribery;
- financial fraud or mismanagement;
- negligence;
- breach of our internal policies and procedures;
- conduct likely to damage our reputation;
- unauthorised disclosure of confidential information or other activity;
- malpractice in relation to public examinations; or
- the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern relating to any of the above and they reasonably believe that disclosure is in the public interest. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy as soon as possible.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work or the way your child has been treated in school. In those cases you should use the Grievance policy, the relevant appeal process under our specific employment policies or (for parents and members of the public) the Complaints policy.

If you have any concerns relating to child protection or safeguarding you must raise these under the appropriate policy immediately.

If you are uncertain whether something is within the scope of this policy, you may seek advice from Public Concern at Work (whose contact details are above) and your Trade Union.

RAISING A WHISTLEBLOWING CONCERN

We hope that in most cases you will be able to raise any concerns with your line manager or Headteacher. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases they may refer the matter to our Responsible Officer.

Concerns about school staff (except the Headteacher) should be made in the first instance, to the Headteacher, via the school office**.** Please mark them as Private and Confidential.
Concerns about the Head of School should be made to the Executive Headteacher via the school office. Please mark them as Private and Confidential.
Concerns that involve or are about the Headteacher or Executive Headteacher should be addressed to the Chair of Governors, via the school office or to the CEO. Please mark them as Private and Confidential.

Concerns about the Chair of Governors, any individual governor or the whole governing body should be addressed to the CEO. Please mark them as Private and Confidential.

Concerns about the Chief Executive Officer (CEO) or a trustee of the Trust, should be addressed to the Chair of Trustees, via the trust office. Please mark them as Private and Confidential.

Complaints about the Chair of Trustees should be addressed to the Senior Independent Trustee, via the trust office. Please mark them as Private and Confidential.

However, where the matter is more serious, or you feel that the person named above will not take your concerns seriously or you prefer not to raise it with them for any reason, you should contact our CEO or Responsible Officer. Contact details are set out at the end of this policy. You can also log a confidential concern through the staff pages on the website.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a Permitted Companion to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

If an investigation is required, a decision will be made as to whether the matter will be addressed internally, be referred to the police or an external auditor or form the subject of an independent inquiry. In cases where the welfare of the child may be at risk, it may be more appropriate to follow the procedure for 'Dealing with allegations of abuse against members of staff and volunteers'.

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 protect your identity. 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. 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 possible reprisals if their identity is revealed should come forward to our Responsible Officer and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Public Concern at Work.
If you have raised a whistleblowing concern with us you should keep the fact and content of that concern confidential so that we may investigate your allegation fairly and effectively. You may of course discuss the matter with a professional adviser or your Trade Union, with any investigator appointed by us and with those other contacts identified in this policy.

If you raise a whistleblowing concern anonymously, via email, we will endeavour to verify the email address belongs to a member of staff and will attempt to engage with you to investigate your concerns. If we can not verify your email address or you do not reply to an email from us, we may investigate your allegation. But you will not be informed of the outcomes of this investigation.

If you write an anonymous letter and we have no way of verifying it has been sent by someone connected with the school, we may not investigate the concern. Sending several anonymous letters will not increase the chances of us investigating.

EXTERNAL DISCLOSURES

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

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body. It will very rarely, if ever, be appropriate to alert the media. You should seek advice before reporting a concern to anyone external. Public Concern at Work operate a confidential helpline. Your Trade Union may also be able to advise you in these matters.

Our understanding is that the Education and Skills Funding Agency is not a prescribed person for the purposes of Section 43F of the Employment Rights Act 1996 and that the ESFA would not count as the Minister of the Crown for the purposes of Section 43E of the Employment Rights Act as no members of our Board are appointed by a Minister of the Crown under any enactment.

If the worker wishes to take the matter outside of the organisation then the following are possible contact points:

- Public Concern at Work
- Audit Commission
- A relevant Trade Union
- Citizens Advice Bureau
- Relevant Professional Bodies
- Regulatory Organisations
- Local Police

A whistleblower will only have protection for a disclosure to a prescribed person if they reasonably believe:

- disclosure is in the public interest; and
- the relevant wrongdoing falls within the description of the matter in respect of which that person is prescribed; and
- the information disclosed and allegation contained in it are substantially true.

Whistleblowing concerns usually relate to the conduct of staff, but they may sometimes relate to the actions of a third party, such as a supplier or government agency. 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. You should contact the Responsible Officer for guidance.

INVESTIGATION AND OUTCOME

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of that assessment. You may be required to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators (including staff) with relevant experience of investigations or specialist knowledge of the subject matter. An investigation may be internal or external. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously or with intent to damage our reputation or of any of our staff or with a view to personal gain, the whistleblower will be subject to our Disciplinary policy.

We encourage prompt disclosure of potential wrongdoing. If you have delayed in disclosing potential wrongdoing you will be asked to explain why you have delayed in making the disclosure.

IF YOU ARE NOT SATISFIED

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with our Responsible Officer. Contact details are set out at the end of this policy.

PROTECTION AND SUPPORT FOR WHISTLEBLOWERS & OTHER STAFF

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.

Staff 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 our Responsible Officer immediately. If the matter is not remedied you should raise it formally using our Grievance policy.

Staff 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 may sue you personally for compensation in an employment tribunal.

Teaching staff, whether the whistleblower or the subject of a whistleblowing allegation, may seek support from the Teacher Support Network's 24-hour Support Line, whose contact details are at the end of this policy.

Staff who are the subject of a whistleblowing allegation

- are entitled to be accompanied at any meetings by a Permitted Companion;
- are not entitled to know the identity of the whistleblower;
- are entitled to see and approve any final statements made by them as part of an investigation; and

- should indicate if they believe that the allegation made against them was false and it if was false whether it was made maliciously or with intent to damage the reputation of us or of any of our staff or for personal gain

RESPONSIBILITY FOR SUCCESS OF THIS POLICY

Our Board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

Our CEO and Responsible Officer have day-to-day operational responsibility for this policy, and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.

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 our Responsible Officer.

This policy will be made available to all employees through AccessPeople and local governors by way of GovernorHub and will be drawn to the attention of new employees and local governors as part of their induction.

This policy will be circulated to all suppliers and will be published on our website

CONTACTS

Internal Contacts Chair of Audit Committee ("Responsible Officer")	Telephone: 01303 905100 Email: btillman@aquilatrust.co.uk
Accounting Officer/CEO	Telephone: 01303 905100 Email: awiles@aquilatrust.co.uk
Senior Independent Trustee	erose@aquilatrust.co.uk
Protect (Independent whistleblowing charity)	Helpline: 020 3117 2520 Website: https://protect-advice.org.uk/
Teacher Support Network	Support Line: 08000 562 561 Website: teachersupport.info/

External Contacts

The District Auditor	The Police
Your Trade Union	A solicitor or legal adviser
Local Citizens Advice Bureau	The Local Government Ombudsman
Relevant professional bodies or regulatory organisations	Public Concern at Work (registered charity that provides free confidential advice)
Relevant voluntary organisation	The Health and Safety Executive