



Trust Policy

Whistleblowing

September 2026

POLICY CONTROL

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1. Introduction

Extol Trust is committed to ensuring that all its activities are lawful and that the highest possible standards are observed. A number of rules, regulations and procedures exist which are intended to promote high standards and to investigate and rectify any shortcomings.

The Academy Trust Handbook states that the Trust must have appropriate procedures in place for whistleblowing, to protect staff who report individuals they believe are doing something wrong or illegal.

These procedures must include making sure all staff are aware to whom they can report their concerns, and the way in which such concerns will be managed. Employees are often the first to realise when something is wrong within a Trust but may not always voice their concerns. This might be because they fear reprisals or harassment or because they think speaking up is disloyal to colleagues.

This procedure provides a way in which concerns about malpractice or wrongdoing may be raised and investigated when other procedures are not sufficient or are inappropriate. It is intended to encourage employees to raise serious concerns and to protect them from any form of reprisal.

This policy applies to all employees of Extol Trust. This includes permanent, fixed term and temporary staff. It also covers agency personnel and staff seconded to a third party. Any concerns relating to the third party, if relevant to the individual's secondment, can also be raised under this procedure. It also covers suppliers and those providing services under a contract with Extol Trust.

Contractors working for the Trust may also use the provisions of these procedures to make the Trust aware of any concerns that the Contractor's staff may have with regard to any contractual or other arrangement with the Trust.

The Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998 and subsequent legislation, protects workers who make qualifying disclosures in accordance with the law. This is commonly known as "whistleblowing."

A disclosure may be protected where the worker reasonably believes that the information disclosed tends to show qualifying wrongdoing that has occurred, is occurring or is likely to occur, and reasonably believes that making the disclosure is in the public interest.

Qualifying wrongdoing includes a criminal offence, breach of a legal obligation, miscarriage of justice, danger to health and safety, damage to the environment, sexual harassment, or deliberate concealment of information tending to show any of these matters.

A protected worker has the right not to suffer detriment because they made a protected disclosure. Where the worker is an employee, dismissal because of a protected disclosure will be automatically unfair. These protections apply from the beginning of employment and may continue after employment has ended.

2. Aims of the Whistleblowing Policy

The policy aims to:

- *Encourage employees to feel confident in raising serious concerns and to question and act upon their concerns.*
- *Provide ways for employees to raise those concerns and get feedback on any action as a result.*
- *Ensure that employees get a response to their concerns and that they are aware of how to pursue them if they know what to do if they are not satisfied with any actions.*
- *Reassure employees that if they raise any concerns in good faith and reasonably believe them to be true, they will be protected from possible reprisals or victimisation.*

This policy does not replace the Trust's complaints procedure. There are also existing procedures in place relation to Disciplinary, Grievance and Capability etc. The Whistleblowing Policy is intended to cover concerns that fall outside the scope of these procedures e.g. malpractice or wrongdoing.

Thus, any serious concerns that the complainant may have regarding the suspicion of malpractice or wrongdoing in any aspect of the Trust provision, or the conduct of staff within the Trust, or others acting on behalf of the Trust, can and should be reported under this policy. Employees are expected to report malpractice and wrongdoing. They may be liable to disciplinary action if they knowingly and deliberately do not disclose information relating to malpractice or wrong doing in any aspect of the Trust's provision or the conduct of staff or others acting on behalf of the Trust.

3. Responsibilities

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

The Trust Whistleblowing Officer is the CEO. They 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. They will maintain a corporate register of the number and nature of the concerns raised and the outcomes (but in a form which does not endanger confidentiality) and will report as necessary to the Trust Board, where appropriate. Concerns should not be reported directly to the Trust Whistleblowing Officer. Further information on how to raise a concern can be found under Section 8.

All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

4. Existing Procedures

The Trusts grievance procedure exists for employees to raise complaints about their employment. Copies of this are available for all employees.

Concerns that relate solely to an individual's personal employment situation will normally be considered under the Grievance Procedure.

However, a concern will not be excluded from this policy merely because the person raising it has also been personally affected. It may still amount to whistleblowing where the person reasonably believes that the disclosure is in the public interest - for example, where sexual harassment may affect other workers or pupils, indicate a wider pattern or risk, or involves a failure by the Trust to meet its legal obligations.

Where a concern contains both personal and public-interest elements, the Trust may use more than one procedure. It will explain this to the person raising the concern and ensure that applicable whistleblowing protections are preserved.

Concerns that may be raised under this policy include:

- *Conduct which is an offence or breach of the law*
- *Disclosures related to miscarriages of justice*
- *Serious health and safety risks, including risks to the public as well as other employees*
- *Serious damage to the environment*

- *The unauthorised use of public funds*
- *Unethical Conduct*
- *Failure to comply with any legal or professional obligation or regulatory requirements*
- *Negligence*
- *Conduct likely to damage Extol Trust's reputation*
- *Unauthorised disclosure of confidential information*
- *Action which falls below the Trust's standards of practice or is a breach of internal policies and procedures*
- *Discrimination*
- *Abuse*
- *Sexual harassment: unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. A concern may relate to sexual harassment that has occurred, is occurring or is likely to occur, including conduct involving another worker, pupil, parent, contractor, visitor or other third party.*
- *The deliberate concealment of any of the above matters*

A disclosure about sexual harassment may qualify for whistleblowing protection where the person making it reasonably believes that disclosure is in the public interest. This may include concerns about a pattern of behaviour, risks to colleagues or pupils, failures in the Trust's systems, concealment of incidents, or conduct by a person whose position may place others at risk.

Any serious concerns that an employee may have about any aspect of conduct by employees of Extol Trust or others acting on behalf of the Trust may be reported under this policy. This policy does not replace the Trust's complaints procedure.

5. What is Malpractice or Wrongdoing?

Employees are encouraged, and expected, to report malpractice or wrongdoing and could in certain circumstances be subject to disciplinary action if they know of this and do not report it. Malpractice or wrongdoing might include any of the following. This is not a comprehensive list but gives examples of the sorts of things which could be raised, under the procedures listed in Section 3, where appropriate, or under this procedure:

- *Unlawful acts or omissions, acts which are criminal or in breach of civil law or statutory duty*
- *Failure to comply with appropriate professional or other established standards*
- *Corruption or fraud*
- *Actions which are likely to cause physical danger to any person*

- *Failure to take reasonable steps to report and rectify any situation which is likely to cause a significant avoidable cost, or loss of income, to Extol Trust or would otherwise seriously prejudice the Trust*
- *Failure to draw relevant matters to the attention of Trustees, Governors or Senior Leaders, or failure to comment appropriately on matters within an employee's responsibilities which might significantly affect an action or decision of, or on behalf of, the Trust*
- *Abuse of power, or the use of Extol Trust's powers and authority for any unauthorised or ulterior purpose*
- *Unfair discrimination in the Trust's employment or services*
- *Action against Extol Trust's Policies*
- *Action that is not in accordance with established standards of practice*
- *Action that amounts to improper conduct by an employee*
- *Other unethical conduct*

6. Safeguards against harassment or victimisation

Extol Trust recognises that the decision to report a concern can be a difficult one to make. If what the employee is saying is true, or they have a reason to believe that it is true, the employee will have nothing to fear because they will be doing their duty to the Trust and pupils of the Trust.

The Trust will not tolerate any harassment or victimisation, including informal pressure, and will take appropriate action to protect employees when concerns are raised. A person will not be penalised because a concern is mistaken or is not substantiated following investigation, provided they had a reasonable belief in the information disclosed. The Trust will not require the person to prove the allegation or investigate it themselves.

Appropriate action may be considered where, following a fair investigation, the Trust concludes that a person knowingly made a false allegation or deliberately fabricated evidence. A concern that is mistaken, unsubstantiated or influenced by mixed motives will not, by itself, justify disciplinary action.

The Trust will not subject, or permit others to subject, a person to dismissal, detriment, retaliation, harassment or victimisation because they have raised, may raise, or are believed to have raised a protected concern. Examples include threats, bullying, ostracism, reduced hours, loss of opportunities, adverse references or unwarranted disciplinary treatment.

Sexual harassment means unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Anyone who believes they have suffered retaliation should report it immediately through any of the reporting routes in this policy. Retaliation may be treated as a disciplinary matter.

Anonymous allegations are necessarily difficult to investigate and, for that reason, cannot always be given the same consideration as attributed allegations. In considering whether any action is to be taken the seriousness and credibility of the allegations will be taken into account as will the feasibility of investigating them and the reason(s) for anonymity being requested.

7. Confidentiality

It is much easier to investigate concerns when those raising them are willing for their names to be disclosed if necessary, in the investigation. However, if employees specifically ask for their names not to be disclosed then this will be respected subject only to any requirement to disclose having the force of law. This may, in some situations impede the investigation. If the only evidence of wrongdoing or malpractice is that of the complainant as an eyewitness of the complainant, then he/she will usually need to be prepared to make a statement. If the situation arises where the Trust is not able to resolve the concern without revealing the identity of the person raising the concern, a statement by the person raising the concern may be required as part of the evidence. The Trust would determine this when investigating the query.

8. How to raise a concern

If an employee suspects wrongdoing in the workplace:

- *They must not approach or accuse the individuals directly*
- *They must not try to investigate the matter themselves*
- *They must not convey their suspicions to anyone other than those with the proper authority, but they must do something*

In most circumstances the employee should raise concerns with the school's Headteacher. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of malpractice.

For example, if the employee believes that senior management is involved, the employee should approach the CEO of the Trust, or alternatively the Chair of the Trust Board, if the employee is uncomfortable approaching the CEO.

The whistle-blower can be accompanied by a trade union rep or a colleague who is not involved in the area of work which the concerns relates, at meetings subsequently held to formally discuss and investigate the disclosures made. It is helpful for the following information to be provided:

- *The background and history of the concern (giving relevant names and dates)*
 - *The reason why the employee is particularly concerned about the situation*
- The earlier the employee expresses the concerns, the easier it will be to take action.*

In order to protect individuals and Extol Trust, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures (for example child protection or capability issues) will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation.

Although the employee is not expected to prove beyond reasonable doubt the truth of an allegation, the employee should demonstrate to the person contacted that there are reasonable grounds for the concern.

Upon investigation the matter will be subject to one of the following actions:

- *Investigation by CEO*
- *Investigation by another officer of the Trust as appropriate*
- *Referral to the Police*
- *Referral to the External Auditor*
- *Referral to the Trust Audit Committee*
- *Referral for independent enquiry*
- *Referral for consideration under another procedure (disciplinary, grievance, etc.)*
- *Any combination of the above*

The decision will be based upon the information provided, and an interview with the employee raising the concern (off site if necessary) if appropriate. In respect of a written report, or a verbal report accepted by the CEO, the CEO will advise the employee in writing within 10 days of what is to happen, information will include:

- *An acknowledgement that the concern has been received*
- *An indication of how long the Trust proposes to deal with the matter*

- *Providing an estimate of how long it will take to provide a final response*
- *An indication of any initial enquires that have been made*
- *An indication of whether further investigation will take place and if not, then reasoning for this*

Where a whistle-blower is unwilling to identify themselves, the person receiving the complaint about malpractice should log the incident and consult the CEO, or seek advice from the Trust's Whistleblowing Officer to consider whether any investigation should be undertaken.

If urgent action is required, this will be taken before any investigation is conducted. The Trust will take appropriate steps to minimise any difficulties the complainant may experience as a result of raising a concern. For example, if they are required to give evidence in criminal or disciplinary proceedings the Trust will advise them about the procedure.

The Trust accepts that the complainant needs to be assured that the matter has been properly addressed. Therefore, subject to any legal restraints, the complainant will receive as much information as possible about the outcomes of any investigation.

The outcome of any investigation into a concern raised will be relayed to the Trust Whistleblowing Officer so that appropriate information can be recorded on the corporate register.

9. Links to other procedures

Unproven Allegations

If an employee makes an allegation and this is not confirmed in the investigation no action will be taken against him/her. The Trust will also try to minimise any negative effects of an allegation being investigated and not confirmed.

Deliberately False Allegations

The Trust will take disciplinary action against any employee deliberately making allegations they know to be false or unfounded, whether frivolously or maliciously. Action will also be taken against any employee inventing or otherwise falsifying facts in order to make a complaint.

Other Procedures

If a matter is raised under the Whistleblowing procedure which could more appropriately be dealt with under another procedure the CEO will consult the appropriate senior officer who would operate the other procedure and, if this is agreed, refer the matter on, advising the complainant accordingly.

10. How the matter can be taken further

This policy is intended to provide employees and other persons with an avenue to raise concerns within Extol Trust and it is hoped that they will take this option in the first instance. The Trust hopes they will be satisfied but if not, they may raise their concerns direct to the Trust Board. If the employee wishes to take the matter outside of the organisation, then following the below link, details the various bodies to do so. In addition to the below the employee could also blow the whistle to their legal advisor and local MP.

Whistleblowing: list of prescribed people and bodies

If the employee chooses to take the matter outside of the Trust, then the employee should ensure that they do not disclose confidential information. In addition, if the complainant wishes to secure the protections afforded by the Public Interest Disclosure Act, they must ensure that their disclosure is protected within the meaning of the Act and that it complies with a set of specific conditions which vary according to whom the disclosure is made. An employee should not take concerns directly to the media, in most cases this will mean the whistle-blower will lose their whistleblowing law rights.

If necessary the complainant may wish to seek advice from their Trade Union, Professional Association or the whistleblowing charity 'Protect'.

The NSPCC whistleblowing helpline is available as an alternative route for employees who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by the Trust. Employees can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

11. Review of this policy

The Trust Board through its Audit Committee will review this policy every 3 years. It may however review this policy earlier than this if the government produces new regulations, or if it receives recommendations on how this policy might be improved.

12. Policy Points of Contact

Key contact	Position	Email
Sonya Black	Headteacher - Clavering	sonya.black@claveringschool.org.uk
Christian Park	Executive Headteacher - Eldon Grove & Roseberry	christian.park@extoltrust.co.uk
Emma Robins	Headteacher - New Silksworth	emma.robins@newsilksworthacademy.co.uk
Caroline Reed	Headteacher - Rossmere	headteacher@rossmereschool.org.uk
Zoe Westley	Headteacher - Springwell	headteacher@springwellschool.co.uk
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POLICY AUTHOR



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