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WHISTLEBLOWING POLICY AND PROCEDURE

Updated April 2026

Approved by the Principal

1. Introduction

The Academy is committed to conducting its business with honesty and integrity and expects all staff to maintain high standards in accordance with our contractual obligations and our policies and procedures from time to time in force.

This policy reflects our current practices and applies to every individual working for the Academy irrespective of their status, level or grade. It therefore includes, the Academy, Heads of Department, members of the Senior Leadership Team, directors, employees, consultants, contractors, trainees, volunteers, home-workers, part-time or fixed-term employees, casual and agency staff (collectively referred to as "you" and "Staff" in this policy) who are advised to familiarise themselves with its content.

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.

2. The Aim of this Policy

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

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It is provided for guidance to all members of staff at the Academy and we reserve the right to amend its content at any time.

This policy also supports the Academy's compliance with UK whistleblowing legislation, including protections in force from April 2026.

3. What is Whistleblowing?

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

- criminal activity;
- child protection and/or safeguarding concerns;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;

- failure to comply with any legal or professional obligation or regulatory requirements;
- financial fraud or mismanagement;
- negligence;
- breach of our internal policies and procedures including our Staff Code of Conduct;
- conduct likely to damage the Academy's reputation;
- unauthorised disclosure of confidential information;
- sexual harassment, including harassment that has occurred, is occurring or is likely to occur;
- deliberate concealment of any of the above matters.

A disclosure about sexual harassment may qualify as whistleblowing where the Staff member reasonably believes the disclosure is made in the public interest. Protection may apply regardless of when the alleged sexual harassment took place, whether in the past, present, or where it is likely to occur.

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

This policy should not be used for complaints relating to your own employment position or personal circumstances at work, such as the way you have been treated at work. In those cases, you should use our Grievance Policy and Procedure or Anti-Harassment and Bullying Policy as appropriate.

However, concerns relating to sexual harassment may fall under this Whistleblowing Policy where they raise issues of wider public interest or affect other members of Staff, even where they overlap with personal experience.

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

4. Confidentiality

We hope that our staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise a concern confidentially, we will endeavour to keep your identity secret in so far as it is possible to do so when following this policy and procedure.

Confidentiality will be handled in line with data protection obligations, particularly where disclosures involve sensitive matters such as sexual harassment.

If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you first. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of a disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered support.

Although a concern may be made anonymously, we encourage staff to put their name to their allegation whenever possible. Concerns that are expressed completely anonymously are much less powerful and proper investigation may be much more difficult or impossible. It is also much more difficult to establish whether any allegations are credible and to protect your position or to give feedback on the outcome of investigations.

We will consider anonymous concerns at our discretion, taking into account factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the contacts listed above and appropriate measures can then be taken to preserve confidentiality.

If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are:

Protect Helpline: **020 3117 2520**

(Independent whistleblowing charity)

E-mail: whistle@protect-advice.org.uk

Website: protect-advice.org.uk

5. Raising a Whistleblowing Concern

We hope that in many cases, you will be able to raise any concerns with your Line Manager or the Senior Leadership Team, speaking to them in person or putting the matter in writing if you prefer. Together, you may be able to agree a way of resolving the concern quickly and effectively.

Concerns relating to sexual harassment may also be raised under this Whistleblowing Policy, including where the alleged conduct involves a senior member of staff or where a member of Staff feels unable to raise the matter through other routes due to fear of retaliation.

Where your concern is regarding potential poor or unsafe practice or potential failures in our safeguarding regime, you should raise this initially with a member of the Senior Leadership Team.

However, where the matter is more serious, or the Line Manager or Senior Leadership Team has not addressed the concern or you would prefer not to raise it with them for any reason, then you should contact one of the following:

- the Principal
- James Salmon, the Governor with responsibility for Whistleblowing matters

It would be helpful if you can provide as a minimum the following information:

- the nature of the concern and why you believe it to be true; and
- the background and history of the concern (giving relevant dates where possible).

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague [or trade union representative] to any meetings under this policy who must respect the confidentiality of the disclosure and any subsequent investigation. We may ask you for further information about the concern raised in this meeting or at a later stage.

We will take down a written summary of the concern raised and provide you with a copy as soon as practicable after the meeting. It will also aim to give you an indication of how it proposes to deal with the matter.

6. Investigation and Outcome

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

Where a whistleblowing disclosure relates to sexual harassment, the Academy may determine that the investigation should run alongside safeguarding, disciplinary or other appropriate procedures.

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 (this may include externally appointed persons). 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. It will endeavour to complete its investigation within a reasonable timeframe. However, sometimes the need

for confidentiality may prevent us from giving specific details of the investigation or any disciplinary action or other action taken as a result. You are required to treat any information about the investigation as strictly confidential.

If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may (where they are an employee) be subject to disciplinary action under our Disciplinary Policy and Procedure.

All whistleblowing concerns and the outcomes of any investigations will be recorded and retained securely in accordance with the Academy's Data Protection Policy.

7. If you are not Satisfied

Whilst we cannot always guarantee the outcome you are seeking, we will try to deal with the concern fairly, professionally and in an appropriate way. If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts outlined above.

8. External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. We would expect that in almost all cases, raising the concern internally would be the most appropriate course of action and you should not find it necessary to alert anyone externally.

However, if for whatever reason, you feel you cannot raise your concern internally and you reasonably believe the information and any allegations are substantially true, the law recognises that in some circumstances it may be appropriate for you to report your concern to another prescribed person, such as a regulator or professional body.

Given the legal sensitivity of disclosures relating to sexual harassment, staff are strongly encouraged to seek appropriate advice before making any external disclosure.

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 externally. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed people and bodies for reporting certain types of concern (see "Further Information" below).

Where you concern is regarding our safeguarding practices, and you feel unable to raise it internally or have concerns about the way your concern is being handled by us, you can contact the NSPCC whistleblowing advice line on 0800 028 0285 – 8:00 AM to 8:00 PM, Monday to Friday or email: help@nspcc.org.uk. Alternatively, you can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.

Whistleblowing concerns usually relate to the conduct of Academy Staff, but they may sometimes relate to the actions of a third party, such as a service provider. In some circumstances, the law will protect you if you raise the matter with the third party. However, you are encouraged to report such concerns internally first. You should contact one of the other individuals set out above for guidance.

9. Protection and Support for Whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We are committed to good practice and high standards. 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.

This protection applies equally where a protected disclosure relates to sexual harassment. Any dismissal connected to a protected whistleblowing disclosure relating to sexual harassment may be treated as automatically unfair.

If you believe that you have suffered any such treatment, you should inform the Principal immediately. If the matter is not remedied to your satisfaction, you should raise it formally using our Grievance Policy and Procedure.

No member of staff must threaten or retaliate against an individual who has raised a concern in any way. We will not tolerate any such harassment or victimisation, and anyone involved in such conduct will be subject to disciplinary action.

However, to ensure the protection of all our staff, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or made in the public interest will also be liable to disciplinary action.

10. Further Information

Protect (formerly known as Public Concern at Work) is a source of further information and advice at protect-advice.org.uk. Protect provides free, confidential whistleblowing advice, and can be contacted online via its website: protect-advice.org.uk/contact-protect-advice-line or by telephone on 020 3117 2520.

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 Principal in the first instance.