



## ACT MULTI ACADEMY TRUST

### Whistleblowing Policy and Procedure

*(Trust-wide policy aligned to the People & Employment Framework and Scheme of Delegation)*

#### DOCUMENT CONTROL

| Field                          | Detail                                                                                                                                                                                 |
|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of document               | Whistleblowing Policy and Procedure                                                                                                                                                    |
| Status                         | Trust-wide employment policy                                                                                                                                                           |
| Approved by                    | Trust Board, on the recommendation of the Finance, Audit and Risk Committee                                                                                                            |
| Policy owner                   | Chief Finance and Operations Officer                                                                                                                                                   |
| Review cycle                   | Annual                                                                                                                                                                                 |
| Next review date               | September 2027, or earlier following any relevant statutory or national framework change                                                                                               |
| Applies to                     | All employees, workers, agency workers, apprentices, consultants, contractors, volunteers, trustees, governors, members and others working for or on behalf of ACT Multi Academy Trust |
| Version                        | V2.0                                                                                                                                                                                   |
| Date approved                  | 09/10/2026                                                                                                                                                                             |
| Date issued                    | Consultation Draft Issued September 2026                                                                                                                                               |
| Scheme of Delegation reference | Operates in accordance with ACT MAT Scheme of Delegation                                                                                                                               |
| Related policies               | People & Employment Framework, Appraisal Policy, Capability Procedure, Grievance Procedure                                                                                             |
| Publication                    | Available to all staff via Trust systems                                                                                                                                               |

#### VERSION CONTROL

| Version | Date   | Author | Summary of Changes                                                                                                                                                                                                                 |
|---------|--------|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2.0     | Oct 26 | CFOO   | Full review and Trust-wide rewrite. Updated to align with Keeping Children Safe in Education 2026, Academy Trust Handbook 2026, current DfE whistleblowing guidance, employment legislation and ACT Multi Academy Trust governance |

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|  |  |  | arrangements. Strengthened safeguarding, fraud reporting, confidentiality, governance oversight and external reporting provisions. |
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## 1. PURPOSE AND PRINCIPLES

### 1.1 Purpose

This policy sets out how concerns about suspected wrongdoing, danger, malpractice or a failure affecting the public interest may be raised and addressed across ACT Multi Academy Trust (the Trust). It aims to support an open, accountable and safeguarding-focused culture in which concerns can be raised promptly and without fear of detriment.

The Trust Board is committed to the highest standards of integrity, openness, probity and accountability across all Trust academies and central services. The Trust encourages individuals to speak up where they reasonably believe that wrongdoing has occurred, is occurring or is likely to occur.

This policy does not form part of any contract of employment and may be amended by the Trust following consultation where appropriate.

### 1.2 Legal and regulatory framework

This policy has been prepared with regard to the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998, current ACAS guidance on whistleblowing, Keeping Children Safe in Education 2026, the Academy Trust Handbook 2026, Department for Education guidance on blowing the whistle about an academy, UK GDPR and the Data Protection Act 2018.

Nothing in this policy prevents an individual from making a protected disclosure to an appropriate prescribed person or body, obtaining legal advice, reporting a crime to the police, or raising an immediate safeguarding concern through the appropriate statutory route.

### 1.3 Aims

- provide clear internal routes for raising concerns and alternative routes where the normal line of management is inappropriate
- ensure concerns are considered promptly, fairly, consistently and by an appropriately independent person
- protect individuals from dismissal, detriment, harassment or victimisation where they raise a qualifying concern in accordance with the law
- distinguish whistleblowing from personal grievances, complaints and safeguarding allegations procedures
- support appropriate investigation, learning, governance oversight and improvement
- enable external escalation where internal reporting is inappropriate or the individual remains dissatisfied

## 2. SCOPE AND DEFINITIONS

### 2.1 Who this policy applies to

The Trust will accept concerns under this policy from employees, workers, agency workers, apprentices, consultants, contractors, volunteers, trustees, governors, members and others working for or on behalf of the Trust. Legal protection depends on the individual's employment status and whether the statutory tests for a protected disclosure are met. The Trust will nevertheless consider genuine concerns raised by anyone within the stated scope.

Former employees and workers may also raise concerns about matters encountered during their work for the Trust.

## 2.2 What is whistleblowing?

Whistleblowing is the disclosure of information which the individual reasonably believes shows wrongdoing affecting others or the wider public interest. A concern may relate to something that has happened, is happening or is likely to happen, or to the deliberate concealment of relevant information.

Examples may include:

- a criminal offence or suspected criminal activity
- a miscarriage of justice
- a breach of a legal, professional or regulatory obligation
- danger to the health or safety of any person
- damage to the environment
- safeguarding failures, unsafe safeguarding practice or a failure to act on concerns about a child
- fraud, theft, bribery, corruption, financial irregularity, misuse of public funds or serious financial mismanagement
- a breach of the Academy Trust Handbook, funding agreement, Financial Regulations or other requirements governing public money
- public examination malpractice
- serious negligence or gross mismanagement
- an unauthorised disclosure or serious misuse of confidential or personal information
- harassment or other conduct where it meets the statutory test for a qualifying disclosure
- a serious breach of Trust policy which affects others or the public interest
- conduct likely seriously to damage the Trust's integrity, lawful operation or public accountability
- deliberate concealment of any of the above

## 2.3 Matters that are not normally whistleblowing

A complaint concerning an individual's own employment, treatment, working relationships, pay or personal circumstances will not normally be a whistleblowing disclosure unless it also engages the wider public interest. Such matters should usually be raised through the Grievance Procedure, Anti-Harassment and Bullying Policy, Pay Policy or another appropriate procedure.

The Trust will not reject a concern merely because the individual has used the wrong procedure. It will identify the appropriate route, explain this where possible and ensure that any urgent safeguarding or legal issue is acted upon without delay.

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## 3. SAFEGUARDING AND CONCERNS ABOUT ADULTS

### 3.1 Immediate safeguarding action

Safeguarding is everyone's responsibility. Any concern that a child may be at risk of harm must be acted on immediately and reported in accordance with the Trust's Child Protection and Safeguarding Policy. Normally this will be to the Designated Safeguarding Lead (DSL) or deputy. Where a child is in immediate danger, emergency services or children's social care should be contacted without delay.

A whistleblowing concern must not delay or replace an immediate safeguarding referral.

### 3.2 Safeguarding practice and organisational failure

A person should use this policy where they are concerned about unsafe safeguarding practice, a systemic failure, concealment, retaliation, or a failure by the Trust or its leaders to respond appropriately. If the person feels unable to raise the issue internally, they may contact the NSPCC Whistleblowing Advice Line or another appropriate external body.

### 3.3 Concerns or allegations about staff

A safeguarding concern or allegation about a member of staff, supply staff member, trainee, volunteer or contractor must be managed under the Trust's procedure for allegations against adults working with children and, where applicable, referred to the Local Authority Designated Officer. Conduct that does not meet the harm threshold may fall under the Low-Level Concerns Procedure. The recipient of a concern must ensure that it is routed correctly and that evidence is preserved.

If a concern relates to the Headteacher, it should be raised with the Chief Executive Officer. If it relates to the Chief Executive Officer, it should be raised with the Chair of Trustees. If it relates to the Chair of Trustees or a majority of trustees, it should be raised with the Vice-Chair or another appropriate independent trustee and external advice should be obtained.

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## 4. PROTECTION AND SUPPORT

### 4.1 No detriment or victimisation

The Trust will not tolerate dismissal, detriment, bullying, harassment, intimidation or victimisation because an individual has raised, supported or participated in the investigation of a genuine whistleblowing concern. Any such treatment should be reported immediately and may be dealt with under the Trust's disciplinary procedures.

Raising a concern will not automatically stop an unrelated management, disciplinary, capability, attendance, grievance, redundancy or other employment process. The Trust will, however, consider whether safeguards are required to ensure fairness and prevent retaliation.

### 4.2 Confidentiality

Concerns will be handled sensitively, and information will be shared only where necessary for proper consideration, investigation, safeguarding, legal compliance or procedural fairness. Where confidentiality is requested, the Trust will seek to protect the individual's identity as far as reasonably practicable. Absolute confidentiality cannot be guaranteed, particularly where disclosure is required by law, needed to protect a child or another person, or essential to a fair investigation. Where possible, the Trust will discuss this with the individual before disclosing their identity.

### 4.3 Anonymous concerns

Anonymous concerns will be considered. However, anonymity may make it more difficult to seek clarification, assess credibility, provide feedback or conduct a full investigation. In deciding how to proceed, the Trust will consider the seriousness of the concern, the information and evidence available, the credibility of the concern, safeguarding or public-interest risks and whether the concern can be corroborated from other sources.

### 4.4 Genuine, mistaken and malicious concerns

No action will be taken against an individual who raises a genuine concern with reasonable belief, even if it is not substantiated. A finding that a concern is unsubstantiated does not mean it was raised improperly. If, following appropriate investigation, the Trust concludes that an employee knowingly made a false allegation, acted maliciously or made a disclosure for personal gain without reasonable belief, the matter may be considered under the disciplinary procedure. This provision must not be used to discourage genuine concerns.

### 4.5 Support and representation

An employee or worker may be accompanied at a meeting under this policy by a recognised trade union representative or workplace colleague. The companion must respect confidentiality. The Trust will identify

appropriate support for the person raising the concern and for any person who is the subject of an investigation, while maintaining impartiality.

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## 5. HOW TO RAISE A CONCERN

### 5.1 Internal reporting routes

A concern should normally be raised with one of the following, taking account of the seriousness of the matter and who may be involved:

- the individual's line manager or a more senior manager
- the Headteacher, for a school-based matter
- the Chief Finance and Operations Officer, particularly for finance, fraud, estates, health and safety, data or operational matters
- the Chief Executive Officer
- the Chair of Trustees, where the concern relates to the Chief Executive Officer or where escalation to the Trust Board is appropriate
- the Vice-Chair or another independent trustee where the concern relates to the Chair of Trustees

The individual may bypass the normal management route where they reasonably believe that a recipient is involved, the concern would not be handled impartially, there is a risk of concealment or retaliation, or the matter is exceptionally serious.

### 5.2 Form of the disclosure

A concern may be raised verbally or in writing. Written disclosure is encouraged because it helps create a clear record, but it is not a condition of the Trust considering the matter. The individual should make clear, where possible, that they are raising a concern under this policy and provide:

- the background and nature of the concern
- relevant names, dates, locations and events
- why the matter is believed to be wrongdoing or a danger affecting the public interest
- any supporting documents or information lawfully available
- whether the matter has been raised previously and, if so, what happened
- any immediate safeguarding, health and safety, financial or evidence-preservation risk

The person raising the concern is not expected to investigate the matter or prove the allegation. They should provide information honestly and avoid confronting those involved, accessing records without authority or taking action that could compromise safety or an investigation.

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## 6. RECEIVING AND ASSESSING A CONCERN

### 6.1 Initial response

The recipient must treat the matter seriously, preserve confidentiality, make an accurate record and arrange an initial discussion as soon as reasonably practicable. If the concern is raised verbally, the recipient should prepare a written summary and offer the individual the opportunity to check it for accuracy.

The recipient must immediately identify whether urgent action is required, including safeguarding referral, protection from harm, preservation of evidence, prevention of financial loss, data breach management or referral to the police or another authority.

### 6.2 Acknowledgement

The Trust will normally acknowledge a concern in writing within ten working days. The acknowledgement should, so far as appropriate:

- confirm receipt
- identify the person responsible for initial assessment
- explain the proposed next steps and likely communication arrangements
- state whether initial enquiries have been made

- explain whether a formal investigation is expected and, if not, the reason
- explain confidentiality limits and available support
- give a contact point for any further information or report of retaliation

The ten-working-day period is a service standard rather than a condition of legal protection. Urgent action must not await the written acknowledgement.

### 6.3 Triage and conflicts of interest

The person leading the initial assessment must be sufficiently senior and independent of the matters raised. Any actual or potential conflict of interest must be declared and managed. The Trust may obtain HR, safeguarding, legal, audit or other specialist advice when deciding the appropriate route.

The initial assessment may determine that the concern should be addressed under this policy, another Trust procedure, more than one procedure in parallel, or referred externally. The individual will be informed of the route so far as confidentiality and legal restrictions permit.

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## 7. INVESTIGATION AND OUTCOME

### 7.1 Possible action

Depending on the nature and seriousness of the concern, action may include:

- management enquiries or agreed corrective action
- a formal internal investigation by an independent investigator
- referral under safeguarding, allegations, low-level concerns, grievance or disciplinary procedures
- referral to the police, Local Authority Designated Officer, children's social care, Health and Safety Executive, Information Commissioner's Office, external auditor, Department for Education or another prescribed or regulatory body
- notification to insurers or professional advisers
- an independent inquiry or commissioned review
- controls, policy, training, governance or organisational improvements

### 7.2 Fairness and confidentiality

Investigations will be proportionate, impartial and properly documented. Any person who is the subject of allegations will be treated fairly and given an appropriate opportunity to respond, subject to safeguarding, criminal, regulatory or evidence-preservation requirements. No conclusion will be reached solely because an allegation has been made.

### 7.3 Communication and outcome

The Trust will keep the person who raised the concern informed at appropriate intervals. At the end of the process, the Trust will confirm that the matter has been concluded and, where possible, provide a summary of the outcome and any general action taken. The Trust may be unable to disclose details relating to another person, disciplinary action, legal advice, safeguarding information, confidential business information or regulatory enquiries.

Where a concern is not substantiated, the individual will be told this where possible. The matter may be reopened if material new evidence becomes available.

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## 8. EXTERNAL DISCLOSURES

### 8.1 General principles

The Trust encourages internal reporting where this is appropriate because it may allow concerns to be addressed quickly. However, the law recognises circumstances in which a disclosure may properly be made externally. Different legal tests may apply depending on the recipient. Individuals are encouraged to seek

independent advice before making an external disclosure, particularly before approaching the media or posting information publicly.

Nothing in this policy requires a person to raise a concern internally first where this is unsafe, inappropriate or not required by law.

## 8.2 External contacts

| Contact                                      | Purpose / route                                                                                                                                                                                               |
|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Protect</b>                               | Independent whistleblowing advice charity. Advice line: 020 3117 2520; website: <a href="https://protect-advice.org.uk">protect-advice.org.uk</a> .                                                           |
| <b>Department for Education</b>              | Whistleblowing disclosures about an academy may be submitted through the DfE Customer Help Portal, including anonymously using the guest option.                                                              |
| <b>NSPCC Whistleblowing Advice Line</b>      | For concerns about safeguarding practice where the individual feels unable to raise the matter internally: 0800 028 0285; <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a> .                          |
| <b>Local Authority Designated Officer</b>    | For concerns or allegations about an adult working with children, in accordance with local safeguarding arrangements.                                                                                         |
| <b>Other prescribed or regulatory bodies</b> | Depending on the subject matter, this may include the Health and Safety Executive, Information Commissioner's Office, external auditor, police, relevant professional regulator or another prescribed person. |
| <b>Trade union or legal adviser</b>          | Individuals may seek advice from a recognised trade union or a legal adviser.                                                                                                                                 |

A person considering external disclosure must take care not to disclose personal, safeguarding or confidential information more widely than is lawful and necessary. This does not prevent a protected disclosure, lawful information sharing for safeguarding, reporting a crime or obtaining legal advice.

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## 9. RECORDS, DATA PROTECTION AND GOVERNANCE

### 9.1 Records and information handling

The Trust will maintain secure and proportionate records of concerns, assessments, decisions, investigations, outcomes and lessons learned. Records will be handled in accordance with UK GDPR, the Data Protection Act 2018, safeguarding requirements, the Trust's Data Protection Policy and its Records Management and Retention arrangements.

Access will be restricted to those who need the information for a legitimate purpose. Records must be factual, distinguish allegation from evidence and decision, and document the rationale for key actions. Safeguarding records must be maintained in accordance with the Trust's safeguarding arrangements.

### 9.2 Monitoring and assurance

The Chief Executive Officer and Chief Finance and Operations Officer are responsible for supporting consistent implementation across the Trust. Headteachers are responsible for ensuring that school staff understand the policy and know how to raise concerns.

The Finance, Audit and Risk Committee will receive periodic, appropriately anonymised assurance on whistleblowing activity, themes, response timeliness, control implications and lessons learned. It will not receive personal details unless necessary and lawful. The Trust Board retains overall responsibility for the policy and for the effectiveness of whistleblowing arrangements.

Serious concerns involving fraud, significant financial irregularity, safeguarding failure or governance breakdown will be escalated promptly through the Trust's governance and regulatory reporting routes, taking account of confidentiality and legal advice.

### 9.3 Awareness and review

The policy will be made accessible to staff and covered through induction, management guidance and periodic reminders. Managers who may receive concerns should understand how to respond, preserve confidentiality and escalate urgent issues.

The policy will be reviewed annually and earlier where there is a relevant change in law, statutory guidance, regulatory expectations, Trust structure or lessons from a concern or investigation.

## APPENDIX A

### Appendix A – QUICK REPORTING GUIDE

Under the Children's Wellbeing and Schools Act 2026, staff are expected to report safeguarding concerns promptly and follow the school's safeguarding procedures at all times. Early reporting enables concerns to be assessed and acted upon quickly, helping to protect children and secure timely support where needed. Staff are expected to remain vigilant and not assume that another colleague will raise the concern on their behalf.

| Situation                                             | Report to                                                                 | Immediate consideration                                                             |
|-------------------------------------------------------|---------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| Concern about wrongdoing or danger                    | Line manager, senior manager, Headteacher, CFOO or CEO                    | State that the concern is being raised under the Whistleblowing Policy.             |
| Concern about the Headteacher                         | CEO                                                                       | Consider safeguarding and LADO requirements where relevant.                         |
| Concern about the CEO                                 | Chair of Trustees                                                         | Preserve independence and seek external advice where appropriate.                   |
| Concern about the Chair of Trustees                   | Vice-Chair or another independent trustee                                 | Consider DfE, external audit or legal advice.                                       |
| Safeguarding concern about a child                    | DSL or deputy immediately                                                 | If there is immediate danger, contact emergency services or children's social care. |
| Concern about safeguarding practice or failure to act | DSL, Headteacher, CEO or Chair of Trustees; external escalation if needed | Do not delay action to protect a child.                                             |
| Allegation about an adult working with children       | Headteacher or CEO, following the allegations procedure                   | Consider LADO referral and evidence preservation.                                   |
| Fraud, bribery or misuse of public funds              | CFOO or CEO; Chair of Trustees if either is implicated                    | Protect funds and evidence; consider external auditor, police and DfE reporting.    |
| Personal employment complaint                         | Normally the Grievance Procedure or other relevant HR procedure           | Check whether the matter also affects the wider public interest.                    |

## APPENDIX B

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### Appendix B – INFORMATION TO INCLUDE WHEN RAISING A CONCERN

- Your name and contact details, unless you wish to remain anonymous
- That you are raising the matter under the Whistleblowing Policy
- What happened, is happening or is likely to happen
- Who is involved and where and when relevant events occurred
- Why you believe the concern affects others or the public interest
- Any immediate risk to a child, person, public funds, data, evidence or Trust operations
- Any supporting information lawfully available to you
- Whether you have raised the matter before and the response received
- How you would prefer to be contacted and any confidentiality concerns

## APPENDIX C

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### Appendix C – REFERENCE FRAMEWORK

| <b>Keeping Children Safe in Education 2026</b>                            | Statutory safeguarding guidance in force from 1 September 2026.                                          |
|---------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| <b>Academy Trust Handbook 2026</b>                                        | Financial governance and control framework effective from 1 October 2026.                                |
| <b>DfE: Blowing the whistle to the Department for Education</b>           | Current route for disclosures about academies, including the Customer Help Portal.                       |
| <b>ACAS: Whistleblowing at work</b>                                       | Current guidance on legal protection, qualifying disclosures, responding to concerns and policy content. |
| <b>Employment Rights Act 1996 and Public Interest Disclosure Act 1998</b> | Principal statutory framework for protected disclosures.                                                 |
| <b>UK GDPR and Data Protection Act 2018</b>                               | Framework for lawful and secure handling of personal information.                                        |