One Community Trust

WHISTLEBLOWING POLICY

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CHANGE RECORD FORM

Version	Date of change	Date of release	Changed by	Reason for change
1	21/11/19	21/11/19	TR	New OCT policy based on WBC policy
2	13/10/21	13/10/21	TR	Replaced WBC policy with bespoke OCT policy
3	30/09/2022	12/10/2022	TR	Annual review – no change
4	07/12/2023	06/02/2024	TR	Annual review – no change
5	30/6/25	07/07/25	TR	Annual review – no change
6	15/05/26	21/05/26	TWI	Update of legislation re: sexual harassment

1. Aims

This policy aims to:

- Encourage affected individuals to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated and that their confidentiality will be respected
- Let all staff in the Trust know how to raise concerns about potential wrongdoing in or by the Trust
- Set clear procedures for how the Trust will respond to such concerns
- Let all staff know the protection available to them if they raise a whistleblowing concern
- Assure staff that they will not be victimised for raising a legitimate concern through the steps set out in the policy even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue)

This policy does not form part of any employee's contract of employment and may be amended at any time. The policy applies to all employees or other workers who provide services to the Trust in any capacity including self-employed consultants or contractors who provide services on a personal basis and agency workers.

2. Legislation

This policy has been written in line with the Academies Handbook and government guidance on whistleblowing. We also take into account the Public Interest Disclosure Act 1998.

This policy complies with our funding agreement and articles of association.

3. Definition of whistleblowing

Whistleblowing is the act of disclosing information about wrongdoing in the workplace. The wrongdoing disclosure must be in the public interest. This means it must affect others. Examples of whistleblowing include (but aren't limited to):

- Criminal offences, such as fraud or corruption
- Pupils' or staffs' health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment

A whistleblower is a person who raises a genuine concern relating to the above.

Not all concerns about the Trust count as whistleblowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistleblowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely to be a grievance.

When staff have a concern they should consider whether it would be better to follow this policy or our staff grievance or complaints procedures.

Protect (formerly Public Concern at Work) has further guidance on the difference between a whistleblowing concern and a grievance that staff may find useful as well as a free and confidential advice line.

4. Procedure for staff to raise a whistleblowing concern

4.1 When to raise a concern

Staff should consider the examples in section 3 when deciding whether their concern is of a whistleblowing nature. Consider whether the incident(s) was illegal, breached statutory or Trust procedures, put people in danger or was an attempt to cover any such activity up.

4.2 Who to report to

Staff should report their concern to their Headteacher or the CEO of the Trust for central function staff. If the concern is about the Headteacher, the staff member should report their concern to the CEO of the Trust. If the concern is about the CEO of the Trust, the member of staff should report their concern to the Chair of the Trust Board.

4.3 How to raise the concern

Concerns should be made in writing wherever possible. They should include names of those committing the wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter.

5. Trust procedure for responding to a whistleblowing concern

5.1 Investigating the concern

When a concern is received by the Headteacher, CEO or Chair of the Trust Board - referred to from here as the 'recipient' - they will:

- Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative
- Get as much detail as possible about the concern at this meeting, and record the information. If it becomes apparent the concern is not of a whistleblowing nature, the recipient should handle the concern in line with the appropriate policy/procedure
- Reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken (see section 6 of this policy)
- Establish whether there is sufficient cause for concern to warrant further investigation. If there is:
    - The recipient should then arrange a further investigation into the matter, involving the CEO and/or Chair of the Trust Board if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In other cases, they may need to report the matter to the police
    - The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps

5.2 Outcome of the investigation

Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether or not a referral is required to an external organisation, such as the local authority or police.

They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.

Beyond the immediate actions, the Headteacher, CEO, Trustees and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

Whilst we cannot guarantee the outcome sought, we will always deal with concerns fairly and in an appropriate manner.

6. Sexual Harassment as a Protected Disclosure

From 4 April 2026, disclosures relating to sexual harassment are formally recognised as a qualifying disclosure under this Whistleblowing Policy.

Employees, workers, contractors, and any other individuals covered by this policy may raise concerns about incidents or suspected incidents of sexual harassment through the whistleblowing channels set out in this document.

A disclosure relating to sexual harassment will be treated as a protected disclosure where it meets the statutory criteria, including: –

- The individual reasonably believes the information shows sexual harassment has occurred, is occurring, or is likely to occur.
- The disclosure is made in the public interest.

Reports of sexual harassment raised under this policy will be handled with the same protections afforded to all whistleblowers, including: –

- Protection from detriment or retaliation.
- Confidential handling of information wherever possible.
- A fair, timely, and thorough investigation.

This whistleblowing route operates in addition to, and not in place of, the organisation's existing Dignity at Work, Anti-Harassment, or Grievance procedures. Individuals may choose whichever route they feel is most appropriate.

7. Malicious or vexatious allegations

Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern.

If, however, an allegation is shown to be deliberately invented or malicious, the Trust will consider whether disciplinary action is appropriate against the person making the allegation.

8. Escalating concerns beyond the Trust

The Trust encourages staff to raise their concerns internally, in line with section 4 of this policy, but recognises that staff may feel the need to report concerns to an external body. A list of prescribed bodies to whom staff can raise concerns with is included here.

The Protect advice line, linked to in section 3 of this policy, can also help staff when deciding whether to raise the concern to an external party.