



**Southfields
Academy**

WHISTLEBLOWING POLICY AND PROCEDURE

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Definition of whistle-blowing

Whistle-blowing covers concerns made that report wrongdoing that is “in the public interest”. Examples of whistle-blowing include (but are not limited to):

- Criminal offences, such as fraud or corruption
- Pupils’ or staff health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Sexual harassment (in effect from 6 April 2026)
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment

A whistle-blower is a person who raises a genuine concern relating to the above. These concerns should be reported under this policy.

Aims and scope of this policy

This policy aims to:

- Encourage individuals affected 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
- provide avenues for you to raise serious concerns about any aspect of the Academy’s work and receive feedback on any action taken
- allow you to take the matter further if you are dissatisfied with the Board of Trustees’ response and
- reassure you that you will be protected from possible reprisals or victimisation for reasonable whistleblowing in good faith.

This policy does not form part of any employee’s contract of employment and may be amended at any time. This policy applies to all employees.

Legislation

There is a requirement to have clear whistle-blowing procedures in place. This policy has been written in line with government guidance on whistle-blowing as well as in accordance with the Public Interest Disclosure Act 1998.

When to raise a concern

Staff should consider the examples in ***Definition of whistle-blowing*** section (see above) when deciding whether their concern is of a whistle-blowing 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.

Preamble

Staff may well be the first to realise that there could be something seriously wrong within the Academy. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Academy. They may also fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

The Board of Trustees is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we encourage employees with serious concerns about any aspect of the school's work (e.g. abuse or neglect of a child) to come forward and voice those concerns via the complaints procedure. It is recognised that certain cases will have to proceed on a **confidential** basis. This document makes it clear that staff can do so without fear of reprisals. Indeed, the Whistleblowing Policy and Procedure are intended to encourage and enable staff to raise serious concerns **within** the Academy rather than overlooking a problem or blowing the whistle outside. This last point is very important. It is dealt with fully below.

These procedures are in addition to the other statutory reporting procedures and existing procedures for dealing with complaints.

This policy has been consulted on with the professional association and trade union representatives of teaching and support staff and has their support.

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

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

Confidentiality

The Board of Trustees will do its best to protect your identity when you raise a concern and do not want your name to be disclosed. It must be appreciated that the investigation process may reveal the source of the information and a statement by you may be required as part of the evidence.

Anonymous Allegations

This policy encourages you to put your name to your allegation. Concerns expressed anonymously are much less powerful, but they will be investigated thoroughly although follow-up action will in such cases be at the discretion of the Board of Trustees.

In exercising the discretion, the factors to be taken into account would include:

- the seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

Untrue Allegations

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. However, when it appears that there are clear grounds for suggesting that you may have acted frivolously, maliciously or vexatiously, the Board of Trustees will undertake a disciplinary investigation. Dependent on the outcome, disciplinary action may then follow.

How to raise a concern

If you suspect fraud, corruption or financial irregularity, you should always inform the Principal/Headteacher directly.

For any other types of concern you should normally, as a first step, raise them with your immediate manager or their superior or the Principal/Headteacher. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, if you believe the senior management is involved, you should approach the Chair of the Board of Trustees.

Concerns are better raised in writing. You are invited to set out the background and history of the concern, giving names, dates and places where possible, and the reason why you are particularly concerned about the situation. If you do not feel able to put your concern in writing, you can request a meeting with the Principal/Headteacher.

The earlier you express the concern, the easier it is to take action.

Although you are not expected to prove the truth of an allegation, you will need to demonstrate to the person contacted that there are sufficient grounds for your concern.

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

You may invite your trade union or professional association to assist you to raise a matter and may wish to seek their advice prior to initiating this procedure.

How the Academy will respond

The Academy will respond to your concerns. Do not forget that testing out your concerns is not the same as either accepting or rejecting them.

The action taken by the Academy will depend on the nature of the concern. The matters raised may:

- be investigated internally
- be referred to the Police
- be referred to the external Auditor

In order to protect individuals and the Board of Trustees, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle which the Academy will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for example, child protection or discrimination issues) will normally be referred for consideration under those procedures.

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

Within ten working days of a concern being received, the Board of Trustees will write to you:

- acknowledging that the concern has been received;
- indicating how it proposes to deal with the matter;
- giving an estimate of how long it will take to provide a final response;
- telling you whether any initial enquiries have been made; and
- telling you whether further investigations will take place, and if not, why not.

The amount of contact between the member of staff considering the issue and you, will depend on the nature of the matter raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from you.

When any meeting is arranged off site if you so wish, you have the right, if you so wish, to be accompanied by a trade union or professional association representative or a friend who is not involved in the area of work to which the concern relates.

The Board of Trustees will take steps to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, you will be advised about the procedure.

Outcome of the investigation

The Board of Trustees accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, you will receive information about the outcome of any investigation.

Beyond the immediate actions, the Principal, Headteacher, trustees and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing. While we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

If a staff member is not satisfied with the way in which their concern has been handled, they can raise their concerns with one of the contact points listed in ***How to raise a concern section*** within this document.

How the matter can be taken further, if necessary

This policy is intended to provide you with a clear route to raise concerns **within** the Academy and for the concerns to be dealt with and settled appropriately.

Please raise a concern internally in the first instance. Complaints made to other bodies, individuals or the media may actually hamper a speedy, full and professional investigation of the concern that you have expressed.

Information which is provided to you on a confidential basis must be treated as such and this may only be overridden where there is a clear public interest in disclosing it and you act in good faith and reasonably. You would need to ensure that you could justify your disclosure because it would be a serious betrayal of trust to use confidential information for any personal advantage, or for malicious or other improper reasons.

Record Keeping

The Chair of the Board of Trustees has overall responsibility for the maintenance and operation of this policy. The Chair will maintain a confidential record of concerns raised and the outcomes (so as not to endanger your confidentiality) and will report as necessary to the Board of Trustees.

Checklist of DO'S and DON'TS

Lastly, some of the key points from the procedure on whistleblowing are summarised below:-

DO

(a) Make an immediate note of your concerns

Note all relevant details such as what was said in telephone or other conversations, the date, time and the names of any parties involved.

(b) Convey your suspicions to someone with the appropriate authority and experience.

- *Usually, to your immediate line manager or their supervisor for other matters (but see paragraph 5.2 above for more details).*

(c) Deal with the matter promptly, if you feel your concerns are warranted.

In a case of suspected fraud, it is important to remember that any delay may cause the Board of Trustees to suffer further financial loss.

DON'T

(a) Do nothing

(b) Be afraid of raising your concerns.

- *You will not suffer any recrimination from the Board of Trustees as a result of raising in good faith a serious concern.*
- *The Board of Trustees will treat any matter you raise sensitively and confidentially.*

(c) Approach or accuse any individuals directly.

(d) Try to investigate the matter yourself.

There are special rules surrounding the gathering of evidence for use in disciplinary or court proceedings. Any attempt to gather evidence or other information by someone who is unfamiliar with these rules may destroy the case.

(e) Convey your suspicions to anyone except those with the proper authority and as set out in this policy and procedure.

Advice and Guidance

Further advice and guidance on how a matter may be pursued under this policy can be obtained from the HR department.