



## Whistleblowing Policy

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## Contents

1	Introduction	3
2	Scope and purpose	3
3	What is whistleblowing?	3
4	Raising a whistleblowing concern	4
5	Confidentiality and data protection	5
6	External disclosures	5
7	Investigation and outcome	6
8	If you are not satisfied	6
9	Protection and support for whistleblowers	6
10	Review of policy	7
11	Contacts	7

## 1 **Introduction**

- 1.1 The Trust is committed to the highest possible standards of honesty and integrity, and we expect all staff to maintain these standards in accordance with the Staff Code of Conduct. 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.
- 1.2 This policy has been formally adopted by the Trust Board.
- 1.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.

## 2 **Scope and purpose**

- 2.1 The aims of this policy are:
  - 2.1.1 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.
  - 2.1.2 To provide staff with guidance on how to raise concerns.
  - 2.1.3 To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 2.2 This policy applies to all of the Trust's employees, trustees, governors, consultants, contractors, casual and agency staff and volunteers (collectively referred to as staff in this policy).

## 3 **What is whistleblowing?**

- 3.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. The law provides protection for workers who raise legitimate concerns about specified matters or "qualifying disclosures". A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that there are wrongdoing or dangers at work. This may include:
  - 3.1.1 criminal activity;
  - 3.1.2 miscarriages of justice;
  - 3.1.3 danger to health and safety;

- 3.1.4 damage to the environment;
  - 3.1.5 failure to comply with any legal or professional obligation or regulatory requirements;
  - 3.1.6 bribery;
  - 3.1.7 financial fraud or mismanagement;
  - 3.1.8 negligence;
  - 3.1.9 breach of our internal policies and procedures including our Staff Code of Conduct;
  - 3.1.10 conduct likely to damage our reputation or financial wellbeing;
  - 3.1.11 unauthorised disclosure of confidential information;
  - 3.1.12 unethical behaviour;
  - 3.1.13 the deliberate concealment of any of the above matters.
- 3.2 A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.
- 3.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure or the Bullying & Harassment Policy.
- 3.4 If you are uncertain whether something is within the scope of this policy, you should seek advice from a member of the Trust's leadership team.
- 3.5 **Safeguarding and child protection**

**3.5 Safeguarding and the Welfare of Pupils:** If a concern relates to safeguarding or the welfare of pupils, it should typically be raised under the school's **Child Protection and Safeguarding Policy** via the Designated Safeguarding Lead (DSL). However, this Whistleblowing Policy **must** be used if:

3.5.1 The whistleblower believes the DSL or Headteacher has failed to act on a reported safeguarding concern or a 'low-level concern' regarding an adult.

3.5.2 The concern relates to a systemic failure in the school's safeguarding culture or oversight.

3.5.3 The whistleblower fears reprisal from senior leadership for raising a safeguarding-related matter. All such disclosures will be handled in accordance with the statutory requirements of **KCSIE 2025/26**.

**3.6 Digital Conduct:** Whistleblowing protection extends to the reporting of unethical behavior, harassment, or data breaches occurring on **unofficial or private messaging platforms** (e.g., WhatsApp, Telegram, or private social media groups) where the conduct relates to Trust business, pupils, or professional reputation.

#### 4 **Raising a whistleblowing concern**

4.1 We hope that you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree on a way of resolving your concern quickly and effectively.

4.2 However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, or they are the subject of the complaint, then you can raise the matter with:

4.2.1 Head of School.

4.2.2 Hub Leader / Executive Headteacher

4.2.3 The CEO

4.2.4 The Chair of Trustees

4.2.5 **If the concern is about senior leaders or governance, or there is a conflict of interest**

If your concern relates to any of the individuals listed in paragraph 4.2, or you reasonably believe there is a conflict of interest, you may report the concern to an alternative contact so that it can be handled independently. For example:

a. concerns about the CEO may be raised with the Chair of Trustees, or if the Chair is unavailable or implicated, with the Vice Chair of Trustees or another nominated trustee

b. concerns about the Chair of Trustees may be raised with the Vice Chair of Trustees or another nominated trustee

c. concerns about a trustee or governor may be raised with the Chair of Trustees, the Vice Chair, or the chair of the relevant board committee responsible for oversight of whistleblowing

d. concerns about a Head of School or Hub Leader may be raised with the CEO or the Chair of Trustees.

We will take steps to ensure that no person who is the subject of the concern is involved in decisions about assessment, investigation, findings, or outcomes.

- 4.3 Contact details are set out at the end of this policy.
- 4.4 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- 4.5 We will take down a written summary of your concern and provide you with a copy after the meeting. This will normally include: what happened, where and when it happened, who is involved, what evidence may exist (for example documents, emails, CCTV, logs), whether anyone is at immediate risk, and what steps you have already taken. You do not need to prove your concern, but providing as much detail as possible will help us assess the concern promptly and fairly.

We will also aim to give you an initial indication of how we propose to deal with the matter and what the next steps are.

## 5 **Confidentiality and data protection**

- 5.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity anonymous. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.
- 5.2 We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the other contact points listed in paragraph 4.2 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 given at the end of this policy.
- 5.3 Where we receive anonymous complaints, we will investigate the complaints as far as is reasonable taking into account:
  - 5.3.1 the seriousness of the issue raised;
  - 5.3.2 the credibility of the concern; and

5.3.3 the likelihood of confirming the allegation from other sources.

**5.4 Data Protection Compliance:** The Trust processes all personal data collected during the whistleblowing process in strict accordance with current UK Data Protection Legislation, including the **Data Protection Act 2018** and the **Data Protection (Use and Access) Act 2025**.

5.4.1 Information will be held securely and only shared with those strictly necessary for the investigation.

5.4.2 Records of whistleblowing concerns, investigations, and outcomes are maintained in line with our **Data Retention Schedule** and **Employee Privacy Notice**.

5.4.3 Any unauthorized disclosure of confidential information by staff involved in an investigation may itself be treated as a disciplinary matter or a separate whistleblowing event.

## 6 External disclosures

6.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

6.2 The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying wrongdoing. In most cases you should not find it necessary to report externally. The law recognises that in some circumstances it may be appropriate to report concerns to an external body, for example a regulator or other prescribed person. External disclosure can carry legal and professional risk, so we strongly encourage you to seek confidential advice before reporting outside the Trust. Protect, the independent whistleblowing charity, can provide advice and holds information on prescribed persons. The UK Government also publishes a list of prescribed people and bodies for whistleblowing.

6.3 Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a contractor, supplier or service provider. In some circumstances the law will protect you if you raise a concern with the third party directly where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the other individuals set out in paragraph 4.2 for guidance.

## **7 Investigation and outcome**

- 7.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation and the most appropriate route for handling it. We will normally acknowledge receipt within two working days and aim to complete the initial assessment within ten working days. We will inform you of the outcome of our assessment and, where an investigation is opened, we will aim to provide periodic updates on progress and expected timescales. You may be required to attend additional meetings in order to provide further information. Timescales may vary depending on the nature, complexity, and urgency of the matter, including any safeguarding or regulatory reporting requirements.
- 7.2 The investigator(s) will collate findings and may make recommendations for action, including changes needed to reduce the risk of future wrongdoing. Findings and recommendations will be provided to the appropriate decision maker for action, ensuring that no individual who is the subject of the concern is responsible for determining the outcome. Where appropriate, an anonymised summary of the concern, findings, and actions will be reported to the Trust Board, or to the board committee responsible for oversight of whistleblowing, so that themes, lessons learned, and control improvements are reviewed at Trust level.
- 7.3 We will aim to keep you informed of the progress of the investigation, its likely timescale and outcome. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 7.4 If we conclude that a whistleblower has made false allegations maliciously, the whistleblower could be subject to disciplinary action.

## **8 If you are not satisfied**

- 8.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.
- 8.2 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 in paragraph 4.2. Alternatively, you may contact the Chair of Governors or our external auditors. Contact details are set out at the end of this policy.

## 9 Protection and support for whistleblowers

- 9.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 9.2 Staff must not suffer any detrimental treatment as a result of raising a genuine concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform one of the contact people in paragraph 4.2 immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.
- 9.3 Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

## 10 Review of policy

This policy is reviewed every two years by the Trust. We will monitor the application and outcomes of this policy to ensure it is working effectively.

## 11 Contacts

Whistleblowing Officer	Sean Powers spowers@stbarnabasmat.com
Chair of Trustees & Link Trustee for Whistleblowing	Steven Bulmer sbulmer@stbarnabasmat.com
Trust's external auditors	Griffin Accountancy Exeter Office 01392 241 228 office@griffinaccountancy.co.uk
Local authority designated officer	<a href="mailto:lado@cornwall.gov.uk">lado@cornwall.gov.uk</a>
Protect (independent whistleblowing charity)	Helpline: (020) 3117 2520 E-mail: <a href="mailto:whistle@protect-advice.org.uk">whistle@protect-advice.org.uk</a> Website: <a href="http://www.protect-advice.org.uk">www.protect-advice.org.uk</a>

The NSPCC whistleblowing helpline	Helpline: 0800 028 0285 E-mail: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
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