

Whistleblowing Policy



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Introduction

In this policy 'Whistleblowing' means the reporting by employees of suspected misconduct, illegal acts or failure to act within an Academy or across the Waterton Academy Trust (the 'Trust'). For the purposes of this policy, a whistleblowing disclosure is one where the person raising the concern reasonably believes that the disclosure is in the public interest and tends to show wrongdoing, malpractice, risk or a failure to act.

Employees are often the first to realise that there may be something seriously wrong within an organisation. 'Whistleblowing' is viewed by the Trust as a positive act that can make a valuable contribution to the Trust's efficiency and long-term success. It is not disloyal to colleagues or the Trust to speak up.

The Trust is committed to maintaining an open and transparent culture in which colleagues feel able to speak up and raise concerns at the earliest opportunity. Concerns raised under this policy will be treated seriously, handled fairly and responded to appropriately.

Roles and Responsibilities

Board of Trustees

The Trust Board is responsible for approving this policy and ensuring that the Trust has an effective whistleblowing procedure in place. The Board will ensure that the procedure is published on the Trust website and that all staff are made aware of the process for raising concerns, how concerns will be managed, the protections available to whistleblowers and who they may contact.

The Trust Board will appoint at least one named Trustee and one named member of staff to whom whistleblowing concerns may be reported. These contacts will be publicised to staff and included in the Contact Information section of this policy.

The Trust Board, through the Audit and Risk Committee where appropriate, will receive anonymised reports on whistleblowing concerns, themes and learning in order to support effective oversight, risk management and continuous improvement.

Chief Executive Officer

The CEO is responsible for ensuring that this policy is implemented consistently across the Trust and that staff are made aware of the whistleblowing procedure through induction, staff communications, annual updates, the staff handbook or intranet, and relevant training.

The CEO is responsible for ensuring that appropriate arrangements are in place for concerns to be investigated independently and fairly, including where concerns relate to senior leaders or where there may be an actual or perceived conflict of interest.

Academy Standards Committee (ASC)

Academy Standards Committees may be made aware of matters raised under this policy where this is appropriate and consistent with the Trust's Scheme of Delegation, confidentiality requirements and any related safeguarding, employment or investigation process.

ASC members must not investigate, determine outcomes, take operational action, or be involved in any matter under this policy where they are implicated in the concern, have an actual or perceived conflict of interest, or where their involvement may reasonably call the independence or fairness of the process into question. In such circumstances, the matter should be referred to the CEO, DCEO, HR, the Chair of Trustees, the named whistleblowing Trustee or another appropriate person who is independent of the concern.

The Executive Headteacher (EHT)/ Headteacher (HT)

EHTs and HTs are responsible for ensuring that all employees within their academy are aware of the Whistleblowing Policy, know how to access it, and understand the routes available to raise concerns. They must ensure that whistleblowing routes are visible and accessible to staff and that staff understand how this policy links to the Trust's safeguarding, child protection, allegations against staff and low-level concerns procedures. EHTs and HTs are also responsible for supporting ASCs, the CEO and other appropriate Trust leaders with any matters brought to the attention of the Academy and/or Trust under this policy that may require investigation, safeguarding action, referral to another procedure and/or disciplinary action.

Employees

Employees should report all concerns about suspected wrongdoing within the workplace, excluding concerns relating solely to their own contract of employment, which come to their attention during their employment. Employees should raise concerns where they have a reasonable belief that the concern is accurate, is in the public interest, and should be subject to further scrutiny.

Employees are encouraged to raise concerns as early as possible. Concerns may be raised openly, confidentially or anonymously, although concerns raised anonymously may be more difficult for the Trust to investigate fully or for the Trust to provide feedback.

Employees should not investigate matters themselves before raising a concern. They should provide as much information as possible to enable the Trust to consider the concern appropriately. Where possible, employees should put their name to any whistleblowing disclosure made and participate in any investigation following a whistleblowing disclosure made by them.

Human Resources (HR)

HR will provide advice and guidance to senior leaders and employees regarding the application of this policy. HR will provide support to any investigation and/or

disciplinary action that may be instigated because of a concern brought to the attention of an Academy or the Trust under this policy.

HR will maintain a confidential central record of whistleblowing concerns raised under this policy and will support consistency in the handling of concerns. HR will also support anonymised reporting to the CEO, Audit and Risk Committee and/or Trust Board, as appropriate.

Aims

The aim of this policy is to encourage employees and others who have serious concerns about any aspect of the Trust's work to come forward and voice those concerns.

This policy is intended to support concerns raised internally within the Trust and, where appropriate, concerns raised externally to a prescribed person, regulator or other appropriate body.

The Trust is committed to becoming an outstanding educator and achieving the highest possible ethical standards in its communities and in all its practices. To help achieve these standards, the Trust encourages a culture of openness, transparency and professional challenge, where employees feel able to speak up about genuine concerns.

If an employee is considering raising a concern, they should read this policy first. It explains:

- the type of issues that can be raised;
- how the person raising a concern will be protected from victimisation and harassment;
- how to raise a concern, and what the Trust will do; and
- who the Trust's named whistleblowing contacts are, including the named Trustee and named member of staff.

If an employee is unsure whether to use this policy or they wish to seek independent advice at any stage, they may contact the independent charity 'Protect' by visiting their website at <https://protect-advice.org.uk/contact-protect-advice-line/> Their advisers can give free confidential advice on how to raise a concern about serious malpractice at work.

This policy is designed to ensure that employees can raise their concerns about wrongdoing or malpractice within the Trust without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

It is also intended to encourage and enable employees to raise serious concerns within the Trust rather than ignoring a problem or 'blowing the whistle' outside.

This policy aims to:

- encourage employees to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice;
- highlight that failure to report a concern relating to the wellbeing of children could be seen as a failing in professional duty for some employees and be a breach of legislation or professional standards resulting in possible disciplinary action;
- provide avenues for employees to raise concerns and receive feedback on any action taken;
- ensure that employees receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied; and
- reassure employees that they will be protected from reprisals, victimisation, harassment or detriment where they raise a concern that they reasonably believe is in the public interest and tends to show wrongdoing, malpractice, risk or a failure to act.

Scope of this Policy

This policy is intended to enable those who become aware of wrongdoing within the Trust affecting a pupil, employee or some other person, to report their concerns at the earliest opportunity so that they can be properly investigated.

Some concerns may need to be considered under another Trust policy or procedure, either instead of or alongside this policy. This may include the Trust's Child Protection and Safeguarding Policy, Low-Level Concerns arrangements, Code of Conduct for Employees Policy, Complaints Policy, Grievance Policy, Disciplinary Policy, Counter Fraud, Irregularity and Cybercrime Policy, Data Protection Policy or Health and Safety procedures.

Where a concern relates to the safety or welfare of a child, the Trust's safeguarding procedures must be followed immediately. A concern should not be delayed because the person raising it is unsure which policy applies.

This policy is not intended to replace existing procedures. For example:

- if a concern relates solely to an employee's own employment, treatment at work or contractual position, it should usually be raised under the Trust's Grievance Policy;
- if a concern relates to safeguarding or child protection, the Trust's Child Protection and Safeguarding Policy and associated procedures must be followed;
- if a concern relates to an allegation against a member of staff, volunteer, supply worker, contractor or other adult working in or on behalf of the Trust, the Trust's safeguarding procedures for managing allegations against staff must be followed;
- if a concern relates to conduct that does not meet the harm threshold but may still be inconsistent with the Code of Conduct for Employees Policy, the Trust's Low-Level Concerns arrangements should be followed;

- if a concern relates to a data breach or information security incident, the Trust's Data Protection Policy should be followed.

Who can raise a concern under this policy

This policy applies to all:

- employees of Waterton Academy Trust;
- employees of contractors working for the Trust, for example agency staff, builders and drivers;
- employees of suppliers;
- Members, Trustees and ASC Governors;
- voluntary workers working with the Trust;
- casual workers, trainees and apprentices;
- consultants and others providing services to the Trust;
- visitors and others working in or with the Trust, where relevant; and
- any other person working under the supervision or direction of the Trust.

Where this policy refers to statutory whistleblowing protection, this applies to workers and employees as defined in law. Other individuals covered by this policy will be supported by the Trust, but their statutory protections may differ.

What should be reported

Any serious concerns that arise about the curriculum, conduct, governance, safeguarding practice, financial management or operations of the Trust, or about anyone acting on behalf of the Trust, should be reported at the earliest opportunity where they:

- make you feel uncomfortable in terms of known standards;
- are not in keeping with the Trust's policies and procedures;
- fall below established standards of practice; or
- may amount to improper behaviour, wrongdoing, malpractice, risk or a failure to act.

Concerns may relate to something that has happened, is happening, or is likely to happen. The person raising the concern does not need to prove the matter, but should have a reasonable belief that the information disclosed tends to show wrongdoing, malpractice, risk or a failure to act.

These might relate to:

- conduct which is an offence or a breach of the law, including where a criminal offence has been committed or there has been a failure to comply with a legal obligation;
- disclosures related to miscarriages of justice;
- racial, sexual, disability or other discrimination;
- health and safety risks affecting pupils, employees or the public;

- damage to the environment, or intention to damage the environment;
- unauthorised use of public or Trust funds, assets or resources;
- possible fraud, financial irregularity, bribery or corruption;
- safeguarding failures, unsafe practice or a failure to follow statutory safeguarding guidance;
- a failure to respond appropriately to child protection concerns, allegations against adults or low-level concerns;
- serious breaches of Trust policies or statutory duties;
- conflicts of interest, abuse of position or failure to declare relevant interests;
- cyber security, data protection or information governance concerns which create significant risk;
- other unethical conduct; or
- deliberate concealment of information relating to any of the above.

This list is not exhaustive.

Safeguarding and low-level concerns

The safety and welfare of children is paramount. Where a concern relates to child protection, safeguarding, unsafe practice, or a failure to follow safeguarding procedures, staff must act without delay and follow the Trust's Child Protection and Safeguarding Policy and associated procedures.

Concerns about the conduct of an adult working in or on behalf of the Trust, including employees, supply staff, volunteers, contractors and governors, must be referred in accordance with the Trust's safeguarding, allegations management and low-level concerns procedures, as applicable.

This policy should be read alongside, and does not replace, the Trust's Child Protection and Safeguarding Policy, Code of Conduct for Employees Policy, and Low-Level Concerns Procedure within the Child Protection and Safeguarding Policy. Where there is any immediate risk to a child, the Trust's safeguarding procedures must be followed without delay.

Where a member of staff feels unable to raise a child protection concern internally, or feels that their genuine safeguarding concern is not being addressed, they may contact the NSPCC Whistleblowing Advice Line on 0800 028 0285 or by emailing help@nspcc.org.uk

Prescribed persons and other external routes

The Trust encourages concerns to be raised internally where appropriate so that they can be considered and addressed as quickly as possible. However, the Trust recognises that there may be circumstances where a person reasonably considers it appropriate to raise a concern externally.

A prescribed person is an individual or organisation to whom a worker may make a whistleblowing disclosure outside their employer while still potentially retaining legal protection, provided the relevant legal tests are met. The prescribed person should be appropriate to the subject matter of the concern.

Relevant external bodies may include, depending on the nature of the concern:

- the Department for Education;
- Ofsted;
- the Health and Safety Executive;
- the external auditor;
- the police;
- the Local Authority Designated Officer or children's social care for safeguarding matters;
- the NSPCC Whistleblowing Advice Line for child protection concerns;
- any other prescribed person or body relevant to the matter being raised.

The current list of prescribed persons and bodies is maintained by GOV.UK. Staff are encouraged to seek advice from Protect, their trade union, professional association or a legal adviser if they are unsure whether or how to make an external disclosure.

Protecting the Whistleblower

Legal rights

This policy has been written to reflect the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998, the Enterprise and Regulatory Reform Act 2013 and subsequent legislation. These provisions protect workers who make qualifying disclosures from dismissal or detriment where the relevant legal tests are met, including that the worker reasonably believes the disclosure is in the public interest and tends to show relevant wrongdoing.

The Trust will not dismiss any worker or subject them to detriment, harassment or victimisation because they have made an appropriate lawful disclosure in accordance with the Act.

Rarely, a case may arise where the employee raising the concern has also participated in the action causing concern. In such circumstances, it is in the employee's interests to raise the matter as soon as possible. The Trust cannot guarantee that no action will be taken in relation to the employee's own conduct, but the fact that they came forward, raised the concern and cooperated with any investigation may be taken into account.

The Trust will not use confidentiality clauses, settlement agreements, non-disclosure agreements or any other contractual terms to prevent a worker from making a protected disclosure.

Harassment or victimisation

The Trust is committed to good practice and high standards and to being supportive of all employees.

The Trust recognises that the decision to report a concern can be a difficult one to make. If an employee honestly and reasonably believes what they are saying is true, they should have nothing to fear because they will be doing their duty to their employer, colleagues and those for whom they are providing a service.

The Trust will not tolerate harassment, victimisation, detrimental treatment or informal pressure because a person has raised, supported or participated in a whistleblowing concern. Any such conduct may be treated as a serious disciplinary matter and dealt with under the Trust's Disciplinary Policy.

Support to employees

Throughout this process:

- employees will be given full support from their designated line manager within the Academy Senior Leadership Team, Trust Central Team or other designated leader;
- concerns will be taken seriously; and
- the Trust will do all it can to help employees throughout the investigation.

Employees may seek support from a trade union representative, professional association representative, work colleague, Protect or, where the concern relates to child protection, the NSPCC Whistleblowing Advice Line.

If appropriate, the Trust will consider temporary re-deployment or adjustment to duties as may be required for the period of the investigation to aid the conclusion of an objective investigation being carried out or to support the employee making the disclosure.

Confidentiality

Employees should feel able to raise whistleblowing concerns openly under this policy. However, where an employee asks for their identity to be kept confidential, the Trust will make every reasonable effort to protect their identity.

Confidentiality will be maintained as far as reasonably practicable, but it cannot be guaranteed in all circumstances. Disclosure of the whistleblower's identity may be required by law, safeguarding duties, police or regulatory referral, the need to conduct a fair investigation, or the requirements of natural justice.

Where it becomes necessary to disclose the identity of the whistleblower, the Trust will discuss this with them in advance wherever reasonably practicable.

Employees should be aware that a proper investigation may be more difficult or impossible if they wish to remain anonymous or if further information cannot be obtained from them.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should raise this with the EHT/HT, CEO, HR, named whistleblowing staff contact, named Trustee, Chair of Trustees or other appropriate senior leader. The Trust will consider appropriate steps to protect confidentiality and support the whistleblower.

Anonymous allegations

This policy encourages employees to put their name to the allegation(s) whenever possible. If the employee does not tell the Trust who they are it will be much more difficult for the Trust to protect the employee's position or to give feedback. This policy is not ideally suited to concerns raised anonymously.

Anonymous concerns will still be considered by the Trust. The Trust will assess whether the concern can be investigated, taking into account the seriousness of the issue, the information provided, the potential risk to children, staff, public funds or the Trust, and the likelihood of being able to verify the concern from other sources.

Malicious actions

The Trust may take appropriate action against any employee who is:

- found to be victimising another person for using this policy or deterring any person from reporting genuine concerns under it; and
- knowingly making false, malicious or vexatious allegations, or making allegations for personal gain where there are no reasonable grounds for believing the information supplied is accurate.

Such employees could be subject to disciplinary action under the Trust's disciplinary policy, which may result in dismissal.

No disciplinary action will be taken against a person simply because a concern raised in accordance with this policy is not upheld, provided the concern was raised with a reasonable belief that it was in the public interest and tended to show wrongdoing.

Raising A Concern

Who should concerns be raised with

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. Employees should normally raise concerns with their immediate line manager in the first instance and/or the HR Department.

Concerns may also be raised with the EHT/HT, the CEO, the DCEO, the named whistleblowing staff contact, the named whistleblowing Trustee, the Chair of Trustees, or another appropriate senior leader or governance contact where the usual reporting route is unsuitable.

If the concern is about the EHT or HT, the concern should be raised with the CEO, DCEO, HR, named whistleblowing Trustee or Chair of Trustees, as appropriate.

If the concern is about the CEO or Accounting Officer, the concern should be raised with the Chair of Trustees or named whistleblowing Trustee.

If the concern is about the Chair of Trustees, the concern should be raised with the Vice Chair of Trustees, named whistleblowing Trustee, Members, or an appropriate external body.

If the concern is about the CFO, HR, a Trustee, Members, the ASC collectively, or any person who would normally receive the concern, the matter should be raised with an alternative senior or governance contact who is not implicated in the concern.

No person who is implicated in a whistleblowing concern, or who has an actual or perceived conflict of interest, should make decisions about how that concern is handled, investigate the concern, or receive confidential details about the concern unless this is necessary and appropriate.

If unsure who to contact, employees may seek free confidential advice from Protect, the whistleblowing charity, or from their trade union, professional association or legal adviser.

The Trust's named whistleblowing contacts are listed in the Contact information section of this policy.

How to raise a concern

Concerns can be raised by telephone, in person or in writing. The earlier concerns are expressed, the easier it is to act.

When raising a concern, employees should provide as much information as possible, including:

- the nature of the concern;
- why they believe the concern to be true;
- the background and history of the concern, including relevant dates;
- the names of any individuals involved;
- any witnesses;
- relevant locations;
- any documents or evidence available;
- whether the concern has already been raised and with whom;
- whether there is any immediate risk to children, staff, public funds, assets, data or the Trust.

Employees are not expected to prove the truth of their concern. However, they should be able to demonstrate that there are reasonable grounds for the concern

and that they reasonably believe the disclosure is in the public interest and tends to show wrongdoing, malpractice, risk or a failure to act.

Employees may wish to consider discussing their concern with a colleague first and they may find it easier to raise the matter if there are two or more who have had the same experience or concerns.

Employees may invite their trade union, professional association representative or a work colleague to be present for support during any meetings or interviews in connection with the concerns raised.

What the Trust will do

The Trust will respond to concerns as quickly as possible. Do not forget that testing concerns is not the same as either accepting or rejecting them.

The overriding principle for the Trust will be the public interest. To be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

Where an investigation is required, the Trust will appoint an appropriate investigator with sufficient independence, seniority and expertise. In complex or serious cases, written terms of reference may be prepared. The investigator must not be implicated in the concern and must not have an actual or perceived conflict of interest.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases however, such as allegations of harm or risk to others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

Where appropriate, the matters raised may:

- be investigated internally by an appropriate senior leader or Trust officer;
- be referred to HR for consideration under the Disciplinary or Grievance Policy;
- be referred through safeguarding procedures, including to the DSL, Local Authority Designated Officer, children's social care and/or police where appropriate;
- be referred to the police, Action Fraud or another law enforcement body;
- be referred to the Department for Education;
- be referred to Ofsted;
- be referred to the Health and Safety Executive;
- be referred to internal or external audit;
- be referred to an external investigator, legal adviser or other specialist;
- form the subject of an independent inquiry.

Where the concern indicates an immediate safeguarding, health and safety, financial, data security or other serious risk, the Trust may take urgent action before providing the written acknowledgement.

Within ten working days of a concern being raised, the person investigating the concern will write to the employee raising the concern:

- acknowledging that the concern has been received;
- indicating how the Trust proposes to deal with the matter including any actions taken up to that point;
- supplying information on staff support mechanisms and the name of a “contact officer” who they can liaise with if concerns or issues arise as a consequence of them making a disclosure;
- an estimate of how long it will take to provide a final response and why it will take this long; and
- confirming whether further investigations will take place and if not, why not.

The amount of contact between the employee and the designated senior leader considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of information. It is likely that employees will be interviewed to ensure that their disclosure is fully understood.

Any meeting can be arranged away from the workplace, if that is preferable of the employee, and a union or professional association representative or a work colleague may accompany the employee to provide support.

The Trust will do what it can to minimise any difficulties that employees may experience as a result of raising a concern. For instance, if employees are asked to give evidence in criminal or disciplinary proceedings, the Trust will arrange for appropriate advice and support.

Employees need to be assured that disclosures have been properly addressed. Unless there are any legal reasons why this cannot be done, employees will be kept informed of the progress and outcome of any investigation. Feedback may be limited where this is necessary to protect confidentiality, data protection rights, safeguarding processes, employment rights, legal privilege, or police, regulatory or disciplinary proceedings.

How the matter can be taken further

This policy is intended to provide all employees of the Trust with an avenue within the Trust to raise concerns. Whilst the Trust cannot guarantee that every employee will receive their desired outcome, the employee’s concern will be dealt with fairly and appropriately and it is hoped that the outcome will be satisfactory.

However, if the employee is not happy and feels that they need to take the matter further, they can use the following contacts:

- Trade Union or professional association;

- Protect;
- Solicitor or independent legal adviser;
- Health and Safety Executive;
- Police or Action Fraud;
- NSPCC Whistleblowing Advice Line for child protection concerns;
- Ofsted;
- Department for Education;
- DfE allegations mailbox for suspected fraud or financial irregularity;
- the external auditor, where relevant;
- any other prescribed person or body appropriate to the subject matter of the concern.

Staff are encouraged to seek advice before making wider external disclosures, as legal protection may depend on the person or body to whom the disclosure is made and the circumstances of the disclosure. This policy does not prevent staff from making a protected disclosure, seeking legal advice, contacting a prescribed person, or making a referral to an appropriate safeguarding, regulatory or law enforcement body.

Staff should take care not to disclose confidential information more widely than is necessary and are encouraged to seek advice before making external disclosures.

This policy does not prevent employees from taking their own legal advice.

Recording and Monitoring

HR will maintain a confidential Trust register of all whistleblowing concerns brought to its attention under this policy. Leaders allocated to consider or investigate a concern must ensure that HR is provided with sufficient information to maintain an accurate central record.

The register will record, as appropriate:

- the date the concern was raised;
- the broad category of concern;
- the academy, team or service area involved;
- the person or role to whom the concern was reported;
- the action taken;
- whether the matter was referred internally or externally;
- the outcome, where known;
- the timescale for response and resolution;
- any lessons learned or improvements identified.

An anonymised report will be provided at least annually to the Audit and Risk Committee and Trust Board, and sooner where a concern is serious or indicates significant risk. Reports will include the number and type of concerns raised, response times, outcomes where known, themes, lessons learned and any

recommended changes to policies, procedures, training, controls, safeguarding practice, internal scrutiny or the Trust risk register.

Data Protection

The Trust processes personal information/data collected in the application of this Whistleblowing Policy in accordance with its legal obligations under the UK GDPR and the Data Protection Act 2018, as set out in the Trust's Data Protection Policy.

Information/data specifically obtained to address issues raised under this Whistleblowing Policy is held securely and accessed by, and disclosed to, individuals only for the purposes of addressing these issues. Inappropriate access or disclosure of an employee's personal information/data constitutes a data breach and should be reported in accordance with the Trust's Data Protection Policy immediately. It may also constitute a matter which will be considered in accordance with the Trust's Disciplinary Policy.

Records relating to whistleblowing concerns will be retained securely and only for as long as necessary in accordance with the Trust's data retention schedule, legal obligations and any relevant safeguarding, employment, audit, regulatory or litigation requirements.

Contact Information

Contacts		
Name/Department	Email / Website	Telephone
Human Resources	hr@watertonacademytrust.org	01924 240767
Named Whistleblowing Staff Contact	Head of Governance governance@watertonacademytrust.org	N/A
Named Whistleblowing Trustee	TBD	TBD
Chair of Trustees	governance@watertonacademytrust.org	N/A
Protect	https://protect-advice.org.uk/	020 3117 2520
NSPCC Whistleblowing Advice Line	help@nspcc.org.uk	0800 028 0285
Ofsted	https://contact.ofsted.gov.uk/online-complaints-schools	0300 123 3155
Department for Education	http://www.gov.uk/contact-dfe	0370 000 2288
DfE Fraud or Financial Irregularity Reporting	allegations.mailbox@education.gov.uk	N/A

GOV.UK prescribed persons list	GOV.UK: Prescribed people and bodies	N/A
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Conclusion

The Trust will endeavour to uphold the aims of this policy and wishes to create a culture that is open and transparent and committed to ensuring employees and others who have serious concerns about any aspect of the Trust's work are able to come forward and voice those concerns without fear.

The Trust would rather concerns are raised at an early stage, even if they later prove to be mistaken, than left unreported.

Review

The Trust will review this policy annually and at any other time where changes to legislation, statutory guidance, the Academy Trust Handbook, Keeping Children Safe in Education, DfE guidance or recommended codes of practice indicate that amendments may be required.

Document Detail			
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