

SOUTH LINCOLNSHIRE ACADEMIES TRUST (SLAT)



WHISTLEBLOWING POLICY

Aspire - Challenge – Achieve

Owner	Approval	By Whom	Review
Deputy Chief Executive Officer (Personnel)	September 2026	Chief Executive Officer	Annually

PUBLIC INTEREST DISCLOSURES**“WHISTLEBLOWING” POLICY**

Workers who make a qualifying disclosure in the public interest may be protected from dismissal or detriment under the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998. Protection depends on the circumstances and the legal tests being met.

1. Introduction

- 1.1. The whistleblowing policy must be read and applied in conjunction with the South Lincolnshire Academies Trust Staffing Policy Statement.
- 1.2. This policy explains how South Lincolnshire Academies Trust, referred to as the Trust, will receive and respond to concerns about suspected wrongdoing or dangers connected with work.
- 1.3. This policy applies to employees and workers, including agency workers, casual workers, trainees and individuals supplied through an intermediary. Consultants, contractors, volunteers, trustees and governors are also encouraged to use the reporting routes in this policy, although statutory whistleblowing protection may not apply to every category in the same way.
- 1.4. Safeguarding concerns, including allegations or concerns about adults working with children, must be reported immediately under the Trust Safeguarding and Child Protection Policy and current Keeping Children Safe in Education requirements. The low level concerns procedure must be used where applicable.
- 1.5. This policy does not form part of any contract of employment and may be amended following appropriate consultation and approval.
- 1.6. The requirement for academy trusts to have a whistleblowing procedure is set out in the current Academy Trust Handbook. The procedure must be approved by the trustees and made available to all staff.

2. Background

- 2.1. Employees and workers may be the first to become aware of wrongdoing. The Trust wants people to speak up promptly and without fear of reprisal.
- 2.2. The Trust is committed to high standards of integrity, probity, openness and accountability and to the Seven Principles of Public Life.
- 2.3. No person should suffer dismissal, disciplinary action, loss of work, threats, harassment, victimisation or another detriment because they have raised a qualifying concern in accordance with the law. Any suspected retaliation should be reported immediately.

3. Aims and Scope

- 3.1. This policy aims to:

- provide clear internal routes for raising concerns
- ensure concerns are considered promptly, fairly and consistently

- explain confidentiality and anonymous reporting
- protect those who raise legitimate concerns from retaliation
- provide feedback where this can lawfully and appropriately be given
- explain routes for escalation inside and outside the Trust

3.2. Whistleblowing is the disclosure of information which, in the reasonable belief of the person raising it, tends to show relevant wrongdoing and is made in the public interest.

A concern may relate to:

- a criminal offence
- a failure to comply with a legal obligation
- a miscarriage of justice
- danger to the health and safety of any individual
- damage to the environment
- the deliberate concealment of information about any of the matters above
- fraud, bribery, corruption, financial irregularity or serious mismanagement
- public examination malpractice
- serious safeguarding failure or an attempt to conceal it

A breach of policy, negligence, reputational concern or disclosure of confidential information will fall within this policy only where the circumstances amount to, or reasonably indicate, relevant wrongdoing or a sufficiently serious public interest concern.

3.3. A person raising a concern is not expected to prove the allegation or investigate it personally. The person should provide the information reasonably available and explain why the concern is held.

3.4. Personal complaints about an individual's own employment, including treatment at work, pay or contractual matters, should normally be raised under the Grievance, DPay or other relevant procedure. A matter may include both personal and public interest elements. The Trust will decide the most appropriate procedure and explain this to the person raising the concern.

4. Safeguards

4.1. Protection from detriment

4.1.1. The Trust will not tolerate harassment, victimisation or retaliation against a person who raises a legitimate concern.

4.1.2. Managers must not attempt to identify an anonymous whistleblower, obstruct a disclosure, instruct someone to remain silent, or subject a person to detriment for raising or supporting a concern.

4.1.3. Raising a concern does not automatically halt an unrelated disciplinary, capability, absence, redundancy or other process. The Trust will ensure that such processes are not used as retaliation.

4.2. Confidentiality

The Trust will respect a request for confidentiality and will restrict knowledge of the whistleblower's identity as far as reasonably possible. Absolute confidentiality cannot be guaranteed where disclosure is required by law, for safeguarding, for natural justice or for a fair investigation. The Trust will discuss this before disclosure where it is lawful and reasonably practicable to do so.

4.3. Anonymous concerns

Anonymous concerns will be considered. The ability to investigate may be limited if further information cannot be obtained. Relevant factors include seriousness, credibility, available evidence, safeguarding or legal risk and the prospect of verification from other sources.

4.4. Concerns not upheld and malicious allegations

No action will be taken against a person merely because a concern raised in the public interest is not upheld or the person is mistaken. Knowingly false or malicious allegations may be considered under the relevant conduct procedure. A finding of malice must be supported by evidence and must not be based simply on the outcome of the investigation.

4.5. The person raising the concern will be told when the Trust considers its response complete, subject to confidentiality and legal restrictions. Concerns may be escalated internally or externally in accordance with this policy and the law.

4.6. Support

4.6.1. Appropriate support will be considered for the person raising the concern and for any person who is the subject of an allegation. Support does not affect the independence of the investigation or any subsequent formal process.

5. Raising a Concern

5.1. A concern may be raised with the immediate line manager, the Headteacher, the Deputy Chief Executive Officer, or the Chief Executive Officer, the nominated staff contact for whistleblowing, or the nominated Trustee for whistleblowing. The person raising the concern may choose the route considered most appropriate to the seriousness and sensitivity of the matter.

5.2. The Trust will publish and keep updated the name and contact details of the nominated staff contact and nominated Trustee contact on the staff accessible copy of this policy and on the Trust website where appropriate.

5.3. A concern about the Chief Executive Officer must be raised with the Chair of Trustees. A concern about the Chair of Trustees should be raised with the Vice Chair or another nominated Trustee. A concern involving the Trust Board as a whole may be raised with an appropriate prescribed person or regulator after advice has been obtained.

5.4. A person is not required to raise a concern with someone who may be involved in the matter and may bypass the normal management route.

5.5. Concerns may be raised in writing, by telephone or at a meeting. The person should make clear that the concern is being raised under the Whistleblowing Policy and provide, where possible, the background, dates, people involved, locations, available evidence and reasons for concern.

5.6. The person raising the concern does not need to prove the allegation or meet an evidential threshold before it can be reported.

5.7. A recognised trade union may advise or raise a concern on a member's behalf.

5.8. At meetings under this procedure, the person may be accompanied by a workplace colleague or trade union representative. The companion must respect confidentiality. Any request for another form of support will be considered reasonably.

6. Safeguarding Concerns

6.1. Any immediate risk to a child must be reported without delay to the Designated Safeguarding Lead or a deputy in accordance with the Trust Safeguarding and Child Protection Policy. If there is an immediate danger, emergency services must be contacted.

6.2. Allegations or concerns about an adult working with children must follow the current safeguarding policy and Keeping Children Safe in Education, including referral to the Local Authority Designated Officer where the relevant threshold is met. Concerns about the Headteacher must be reported to the Chair of Governors and the Chief Executive Officer. Concerns about the Chief Executive Officer must be reported to the Chair of Trustees. Concerns about safeguarding practice within the Trust may also be raised through the NSPCC whistleblowing advice line.

6.3. The whistleblowing route does not replace immediate safeguarding reporting. Both procedures may operate where appropriate.

7. Responding to a Concern

7.1. The recipient must record the concern promptly, preserve relevant information, assess any immediate safeguarding, safety, fraud or evidence risks, and notify an appropriate senior decision maker without alerting any person who may be implicated.

7.2. The Trust will acknowledge the concern in writing within 10 working days where contact details are available. The acknowledgement will explain the proposed next steps, the contact arrangements and, where possible, when a further update will be given.

7.3.1. An initial assessment will decide whether the matter falls within this policy, requires urgent action, should be considered under another procedure, or should be referred to an external authority. The assessment must not seek to decide the truth of the allegation prematurely.

7.3.2. If the concern is given orally, the recipient will prepare a written summary and offer the person raising it the opportunity to check the factual accuracy. Refusal or inability to sign a note will not prevent the concern being considered.

7.3.3. Records will be stored securely, access will be restricted and personal data will be handled in accordance with the Trust Data Protection Policy and applicable law.

7.4. Investigation and referral

7.4.1. The decision maker will appoint an investigator who is suitably skilled and sufficiently independent. Any actual or perceived conflict of interest must be declared and managed.

7.4.2. Depending on the concern, action may include internal investigation, independent investigation, referral to the police, external auditor, local authority, safeguarding partners, examination regulator, funding body or another prescribed person or regulator.

7.4.3. The scope, evidence, interviews, findings and decisions will be recorded. The civil standard of proof may be used for internal factual findings unless another applicable procedure requires otherwise.

7.4.4. The person who is the subject of an allegation will be treated fairly and given an appropriate opportunity to respond, unless doing so would create a safeguarding risk, prejudice a criminal or regulatory investigation, risk destruction of evidence or otherwise be unlawful.

7.5. Outcome and feedback

7.5.1. The person raising the concern will receive appropriate updates and will be told when the Trust's response is complete. The Trust will provide as much information about the outcome as it can, but may be unable to disclose personal data, confidential investigation material, legal advice or details of disciplinary action.

7.5.2. If the person is dissatisfied, the concern may be escalated to the Chief Executive Officer, Chair of Trustees or nominated Trustee, provided that person has not already determined the matter. The review will consider whether the procedure was followed, relevant evidence was considered and the response was reasonable. It will not necessarily reinvestigate the whole matter.

8. Raising Concerns Outside the Trust

The law permits disclosures to certain external bodies in specified circumstances. The legal conditions vary according to the recipient and circumstances. Anyone considering an external disclosure is encouraged to obtain independent advice.

Protect, the independent whistleblowing charity: 020 3117 2520 and protect-advice.org.uk. Contact details should be checked at each annual review.

A relevant prescribed person or body listed by GOV.UK, where the concern falls within that body's remit.

Other possible contacts may include a recognised trade union, professional body, external auditor, the police for suspected criminal conduct, or a solicitor.

Concerns about wrongdoing or malpractice in an academy trust may be raised with the Department for Education in accordance with the Department's published routes. Safeguarding concerns may be raised through the NSPCC whistleblowing advice line on 0800 028 0285 or help@nspcc.org.uk.

.2. A person making an external disclosure should not disclose more confidential or personal information than is reasonably necessary and should obtain advice where unsure. Nothing in this policy prevents a protected disclosure, a report to a regulator or law enforcement body, or another disclosure required or protected by law.

9. Monitoring, Reporting and Review

9.1. The Trust Board will appoint one Trustee and one staff member as named whistleblowing contacts and will ensure that their contact details are readily accessible to staff.

9.2. The Trust will maintain a confidential central record of concerns, actions, outcomes, timescales and any learning, with access limited to those who require it.

9.3. The Trust Board or an appropriate committee will receive at least an annual anonymised report on the operation of this policy, including themes, timeliness, outcomes and actions. Reporting must not identify whistleblowers or individuals involved unless lawful and necessary.

9.4. The policy will be reviewed annually and sooner following a significant legal, regulatory or organisational change or learning from a case. The review will check the current Academy Trust Handbook, Keeping Children Safe in Education, GOV.UK prescribed persons list and external contact details.

9.5. The policy will be made freely available to all staff and published on the Trust website.

10. Key Contacts to Complete Before Approval

Nominated staff whistleblowing contact: Jemma Curson CEO

Nominated Trustee whistleblowing contact: Duncan Pickering

Chair of Trustees: John Stokes

Vice Chair of Trustees: Duncan Pickering

Trust safeguarding contacts and Local Authority Designated Officer details: see the current Trust Safeguarding and Child Protection Policy.

References

- Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998
- Academy Trust Handbook 2025, effective from 1 September 2025
- Academy Trust Handbook 2026, effective from 1 October 2026
- Keeping Children Safe in Education, current statutory guidance
- GOV.UK: Whistleblowing for employees and prescribed persons guidance
- Protect: independent whistleblowing advice
- Trust Safeguarding and Child Protection Policy, Grievance Procedure, Disciplinary Policy, Data Protection Policy and Fraud Response arrangements