

Leading Learners Multi Academy Trust



Whistleblowing Policy

Approved by: Trust Board

Date: 11 June 2026

Last reviewed on:

Next review due by: June 2027

1. Our commitment to speaking up

Leading Learners Multi Academy Trust is committed to safeguarding and promoting the physical, mental and emotional welfare of all members of its school communities. In doing so, the Trust is committed to fostering an open and supportive culture across all its schools and central services, where integrity, transparency and honest communication are valued at every level.

It is recognised that people working within the Trust and its school are often the first people to witness any type of wrongdoing within an organisation and, that information uncovered could prevent wrongdoing, which may damage an organisation's reputation or performance, and could even save people from harm or death.

In line with the Trust's commitment to openness and accountability, all individuals working at the Trust and its school will be encouraged to report concerns to the school, or appropriate prescribed body, if they see or suspect that something is wrong - this is known as "blowing the whistle".

The implementation of this policy will:

- Give confidence to members of staff when raising concerns about any suspected danger or wrongdoing which is inconsistent with school standards and policies.
- Provide members of school staff and the central team with appropriate pathways and avenues to raise concerns.
- Ensure that members of staff receive a response to the concerns they have raised and feedback on any action taken where appropriate.
- Offer assurance that members of staff should be able to raise genuine concerns without fear of reprisal even if they turn out to be mistaken.

This policy does not form part of any employee's contract of employment and may be amended at any time.

2. Legislation

The requirement to have clear whistle-blowing procedures in place is set out in the [Academy Trust Handbook](#). This policy has been written in line with the above document, as well as [government guidance on whistle-blowing](#). We have also taken into account the [Public Interest Disclosure Act 1998](#). This policy complies with our funding agreement and articles of association.

3. What is whistleblowing?

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 an employee who has a reasonable belief that wrongdoing or dangers at work. This may include:

- 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.

What is not covered by this policy?

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.

If a complaint involves personal circumstances alongside wider concerns (e.g. pupil health and safety), the staff member must consult with their line manager to decide the most appropriate reporting procedure.

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

Protect (formerly Public Concern at Work) has:

- [Further guidance](#) on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure
- A free and confidential [advice line](#)

Concerns raised under this Policy will be directed to the most appropriate procedure, and the recipient of the report will clearly explain when an issue is better handled through another route. While many matters can be resolved informally or through existing policies, this Policy is specifically for concerns raised in the public interest about potential wrongdoing or risk. Individuals will not be disadvantaged for raising a concern in good faith, even if it is initially made through the wrong process.

4. Who does this policy apply to?

This policy applies to all individuals working for or on behalf of the Trust, including school-based staff, central Trust staff, Trustees, Local Governors, consultants, contractors, casual and agency workers, apprentices and volunteers. For the purposes of this policy, these individuals are collectively referred to as "employees".

5. How to report a concern internally

5.1 Step One

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

In the first instance any concerns can be raised with your Headteacher or, for central Trust staff, your line manager. Volunteers, governors, trustees, contractors, consultants, agency workers and other individuals covered by this policy should normally raise concerns with their usual Trust contact or the person responsible for overseeing their work.

However, where the matter is more serious, where you feel that your concern has not been addressed appropriately, where you would prefer not to raise it with your Headteacher, line manager or usual Trust contact for any reason, or where they are the subject of the concern, you may report your concern to one of the following:

1. Director of School Improvement – **Rebecca Bridges**
2. Chief Financial Officer - **Liam Knowles**
3. Chief Executive Officer – **Yvonne Brown**
4. Chair of the Trust Board – **Sam Quigley**

If the concern relates to the CEO, the Chair of the Trust Board, or a Trustee/governance colleague, you should contact the Vice Chair of the Trust Board.

If you require contact details for any of the above individuals, please email enquiries@leadinglearnersmat.co.uk and request the relevant information.

5.2 When raising a concern, you should provide as much information as possible to help the Trust investigate the matter. This may include the names of those involved, relevant dates, locations, details of any witnesses, and any supporting evidence or documentation available to you.

The following information should be provided where known:

- the nature of the concern and why you believe it to be true;
- the background and history of the concern, including relevant dates, times and locations;
- the names of any individuals involved or who may have witnessed the matter;
- details of any evidence that supports the concern; and
- any personal interest you may have in the matter.

Employees are encouraged to give their name when reporting an allegation, to help the trust take the investigation further. However, a complainant's right to anonymity will be respected.

A proper investigation may be more difficult or impossible if further information cannot be obtained from the employee. This will also make it more difficult to establish whether any allegations are credible.

6. Protecting identity

The Trust will take all reasonable steps to protect the identity of anyone raising a concern. Confidentiality may only be overridden where required by law or where it would significantly impede a fair investigation.

7. Respecting confidentiality

All parties must maintain confidentiality during and after an investigation. Misuse or breach of confidential information may result in disciplinary action.

8. Zero tolerance for victimisation

Any attempt to deter someone from raising a concern, or any form of retaliation, will be treated as a serious disciplinary matter. This includes indirect or subtle behaviours.

9. Trust procedure for responding to a whistleblowing concern

9.1 Investigating the concern

When a concern is received by the Headteacher / CEO / Trustee /Director of School Improvement – 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 that the concern is not of a whistle-blowing 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.
- 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 Trust Board if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In others, 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

Within 5 working days– excluding periods of trust/school closure – of a concern being referred to the recipient they will write to the complainant to:

- Acknowledge that the concern has been received
- Indicate how the matter is to be dealt with
- Give an estimate of how long it will take to provide a final response, informing the complainant as to whether any initial enquiries have been made
- Tell the employee whether further investigations will take place and if not, why not

Throughout any investigation, the trust will provide wellbeing check-ins for both the complainant and the subject(s) of a concern. Where appropriate, support and signposting to manage expectations, protect emotional wellbeing and maintain professional confidence will be offered.

9.2 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 (LA) 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 CEO, 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 the employee is not happy with the way in which their complaint has been handled, they can raise this under the Trust's Complaints Procedure Policy.

10. Malicious or vexatious allegations

Employees are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made with the reasonable belief that the disclosure is in the public interest and meets the definition of whistle-blowing as listed in section 3, but the investigation finds no wrongdoing, there will be no disciplinary action against the employee who raised the concern.

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

11. Escalating concerns beyond the trust

The trust encourages employees to raise their concerns internally, in line with section 5 of this policy, but recognises they may feel the need to report concerns to an external body. A list of prescribed bodies to whom employees can raise concerns with is included [here](#).

It is advised that employees seek advice before reporting a concern to an external body. The Protect advice line, linked to in section 3 of this policy, can help when deciding whether to raise the concern to an external party.

12. Approval

This policy will be reviewed annually.

These procedures have been agreed by the board of trustees, who will approve them whenever reviewed.