

Whistleblowing Policy

REVIEW DATE:

SEPT 2026

NEXT REVIEW DATE:

SEPT 2027

1. Introduction & Purpose of Policy

Whistle blowing is the reporting, by those working for or on behalf of the MAT, of suspected wrongdoing on the part of SFET employees, Members, Local Governing Bodies, Trustees and volunteers. Such wrongdoing might include fraud, malpractice, breach of health and safety law or some other illegal act.

South Farnham Educational Trust is committed to achieving the highest possible standards of honesty, openness and accountability and relies on its employees to help maintain these standards. In pursuit of these aims, the Trust encourages all individuals to raise concerns which they may have about the conduct or practices of others. This policy sets out how such concerns will be dealt with. It applies to all groups listed in Paragraph 1 above. Other individuals performing work on behalf of the Academy, such as agency workers and contractors can also use the whistleblowing policy.

This policy aims to give members of staff and others working on behalf of the Academy the confidence to raise serious concerns using the routes provided, and to reassure staff of the protection they are afforded when they have made a disclosure in good faith. It will be fairly and consistently applied in accordance with the Academy's commitment to equal opportunities.

This procedure is for disclosures about matters other than a breach of the employee's own contract of employment. Such concerns should be raised under the grievance procedure that deals with breaches of contract.

2. Legislation

The Public Interest Disclosure Act 1998 (by way of amendment to the Employment Rights Act 1996) is designed to provide protection to workers who raise genuine concerns about specified matters. These are known as "qualifying disclosures". The specified matters are:

- Conduct which is a criminal offence;
- Breach of any other legal obligation;
- Disclosures related to miscarriages of justice;
- Health and safety risks, including risks to the public or pupils as well as other staff;
- Damage to the environment; or
- Deliberate concealment of any of the above.

This list is exhaustive and defined by the Public Interests Disclosure Act 1998.

A worker who makes a qualifying disclosure has the right not to be dismissed, subjected to any other detriment or victimised because he/she has made the disclosure. The Trust will take a zero tolerance approach to any act of harassment or victimisation resulting from a member of staff raising a concern in good faith. A member of staff making an allegation within the scope of this policy will be supported by the Trust when raising a concern, providing that he/she:

- Believes the concern to be true
- Is not acting maliciously or making false allegations

- Is not seeking any personal gain.

3. Raising a Concern

As a first step, a member of staff should normally raise concerns with his/her immediate line manager, the Headteacher or the Academy's Designated Safeguarding Lead (DSL) where this is appropriate to the nature of the concern. If the allegations involve the Headteacher in any way, the whistleblower should raise the matter with the Chair of the Local Governing Body, Chair of the Trust or with the CEO. If any of **these** individuals are in any way involved in the whistleblowing or the whistleblower feels uncomfortable with this then an independent external organisation should be contacted [please see section 7].

Concerns may be raised verbally or in writing, but the earlier the concern is expressed the easier it is to take any required action. Where a concern is raised verbally, the person hearing it must ensure that a written statement of it is made to assist with any subsequent investigation. The staff member will be asked to complete a staff concern form unless the whistleblower has requested anonymity (see appendix 1) – including any low-level concerns. The concerns raised will be treated in confidence, whilst recognising that the individual raising the concerns may need to come forward as a witness at a later date.

The whistle blower may invite a recognised trade union representative or a work colleague to be present during any meetings or interviews held in connection with the concerns raised.

We recognise that some staff may wish to raise concerns anonymously. If you wish to do so, you can:

- Send a written concern to the Chair of the Trust Board
- Use our confidential reporting email: clerk@sfet.org.uk
- Contact Protect's independent advice line on 020 3117 2520

Please note that while we will investigate anonymous concerns, it may be more difficult to:

- Obtain all relevant information
- Keep you updated on progress
- Provide you with the outcome
- Protect you from any potential detriment if your identity becomes known through other means

We therefore encourage you to provide your identity in confidence, with the assurance that it will be protected unless we are required by law to disclose it.

4. Investigating Concerns

The investigator will aim to complete the investigation within 28 working days of the concern being raised. If the investigation is likely to take longer than this, the whistleblower will be informed of:

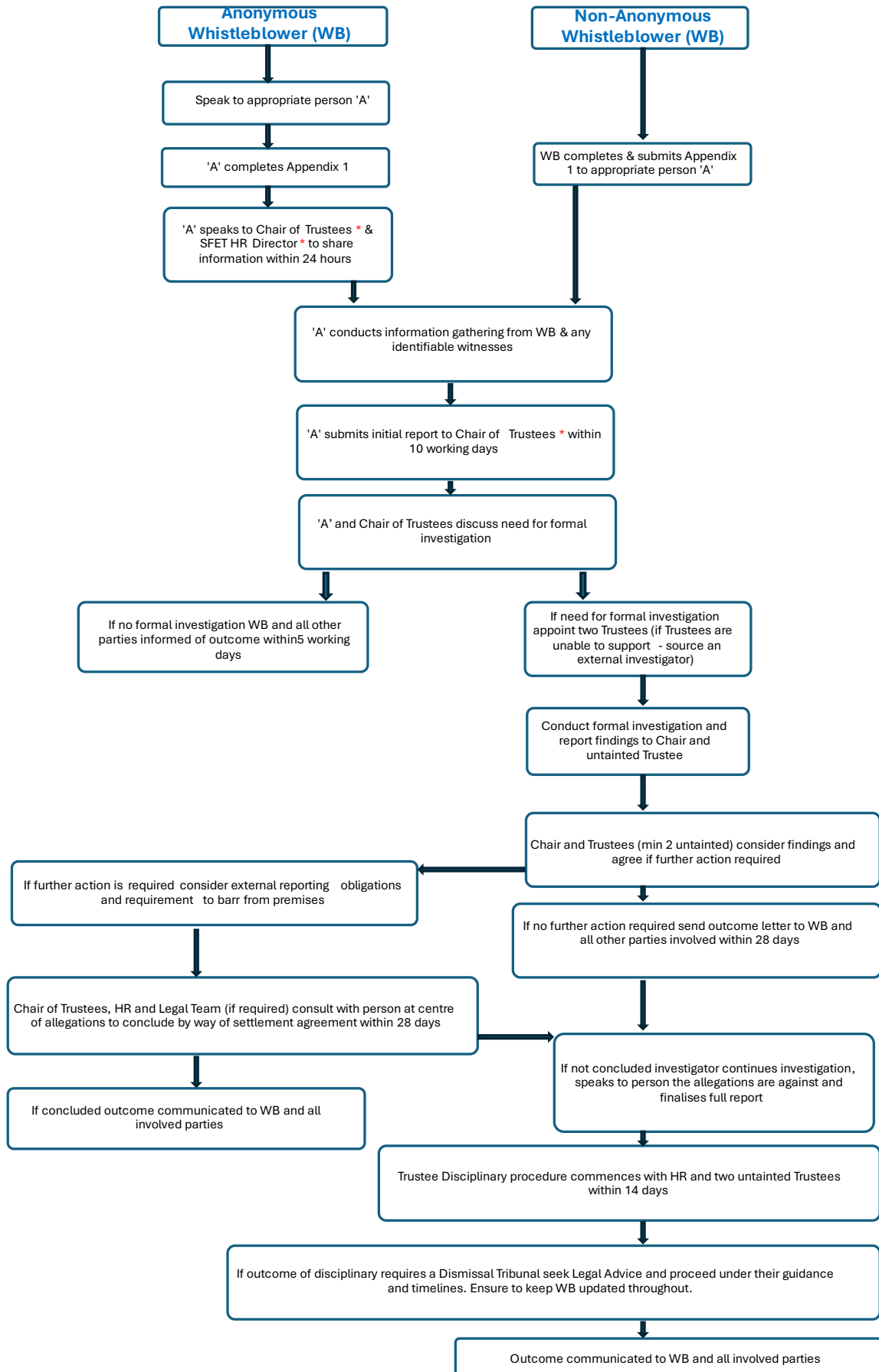
- The reasons for the delay
- The revised timeframe
- When they can expect the next update

The whistleblower will receive progress updates at least every 14 working days during the investigation. In complex cases, investigations may take longer, but we will always aim to conclude them as quickly as possible whilst ensuring thoroughness.

The maximum timeframe for completing an investigation will normally be three months, unless there are exceptional circumstances (such as police involvement or external regulatory investigations). In such cases, the whistleblower will be kept informed throughout.

Please see the whistleblowing investigation process on the following page depending on if the whistleblower is anonymous or not anonymous.

Investigating Concerns Process



* If the Whistleblowing is in regard to the Chair of Trustees /HR Director please see Section 7.

5. Support for Whistleblowers

We recognise that raising a concern can be difficult and potentially stressful. The trust will provide appropriate support to any member of staff who raises a genuine concern, including:

- Regular contact and updates from the investigating officer
- Access to the trust's Employee Assistance Programme [or specific support service]
- The right to be accompanied by a trade union representative or work colleague at any meetings
- Reasonable adjustments to working arrangements, if needed during the investigation
- Ongoing monitoring of wellbeing following the conclusion of the investigation

If staff need to give evidence as part of the investigation, or any subsequent proceedings, we will:

- Discuss with them how this will be managed
- Provide appropriate support and preparation
- Consider any concerns they have about confidentiality or safety

The line manager (if not involved in the concern) or another appropriate senior leader will be assigned to provide pastoral support throughout the process.

6. Malicious or Vexatious Complaints

If a whistleblower makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, an allegation is made frivolously, maliciously or for personal gain, disciplinary action is likely to be taken in accordance with the Trust's disciplinary procedure.

7. Contacting External Organisations

The Trust encourages whistleblowers to make use of the internal procedure before considering referring concerns outside the Trust. If the whistleblower feels that it is right to take the matter outside the Trust, contact can be made with a recognised trade union, local Citizens Advice Bureau, relevant voluntary or independent organisation or legal advisor. The Public Interest Disclosure Act also sets out a number of bodies to which protected disclosures can be made, including HM Revenue & Customs, the Financial Services Authority, the Health and Safety Executive and the Serious Fraud Office. A whistleblower should be aware that going directly to the press may limit their protection under the Public Interest Disclosure Act and they could therefore be subject to disciplinary action as a result. A whistleblower considering such a course of action is strongly advised to seek prior advice from their trade union or an independent organisation such as Public Concern at Work (www.protect-advice.org.uk)

If any of these individuals are in any way involved in the whistleblowing or the whistle blower feels uncomfortable with this then an independent external organisation should be contacted such as:

- Protect (formerly Public Concern at Work): 020 3117 2520 or whistle@protect-advice.org.uk (www.protect-advice.org.uk)

- NSPCC Whistleblowing Advice Line: 0800 028 0285 or help@nspcc.org.uk
- Ofsted Whistleblowing Hotline: 0300 123 3155 or whistleblowing@ofsted.gov.uk

8. Monitoring & Reporting

The Chair of the Trust Board has overall responsibility for overseeing the operation of this policy and for ensuring that appropriate records are maintained of genuine concerns raised and the outcomes. The Chair will report as necessary to the Board and to other outside agencies.

The trust will maintain secure records of all whistleblowing concerns raised, including:

- The nature of the concern
- How it was investigated
- The outcome and any action taken
- Any support provided to the whistleblower

These records will be:

- Stored securely in accordance with our data protection policy
- Accessible only to the Chair of the Trust Board, CEO, and those directly involved in managing the concern
- Retained for 7 years from the conclusion of the investigation, or longer if required by legal or regulatory requirements
- Reviewed regularly to identify any patterns or systemic issues

Records will be anonymised where possible for reporting purposes, whilst maintaining sufficient detail to ensure accountability and learning.

8. Data Protection

When an individual makes a disclosure, the trust will process any personal data collected in accordance with its data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

9. Status of Policy and Review

The content and operation of this policy is reviewed annually.

10. Communication and Training

This policy will be communicated to all staff through:

- Induction for all new staff
- Staff handbook
- Annual safeguarding training

- The trust's website
- Regular reminders in staff briefings

All staff will receive training on whistleblowing, including:

- What constitutes a whistleblowing concern
- How to raise a concern
- The protection available to whistleblowers
- The difference between whistleblowing and other procedures (grievance, complaints, etc.)

Senior leaders and those who may receive whistleblowing concerns will receive additional training on:

- How to respond to and investigate concerns
- Maintaining confidentiality
- Supporting whistleblowers
- Record keeping requirements

Should you require any guidance or further information please contact George Kendall, SFET Governance Professional at gkendall@sfet.org.uk.

Appendix 1

SFET Whistleblowing Concern Form

Your Details	
Name of person raising the concern:	
Job title and school/location:	
Contact details (email/phone):	
Date and time form completed:	
Do you wish to remain anonymous?	Yes ☐ No ☐
Signature:	
Details of the Concern	
Name(s) of person(s) this concern is about:	
Their role(s) and location(s):	
Date(s) and time(s) of incident(s):	
Have you raised this concern elsewhere?	Yes ☐ No ☐
If yes, please provide details:	

Please provide a detailed description of your concern below. Include:

- What happened (be as specific as possible)
- When it happened (dates and times)
- Where it happened

- Who was involved
- Whether anyone else witnessed it
- Any relevant background or context
- Why you believe this is a matter of concern
- Any evidence you have (or know about)

Please use additional sheets if necessary.

What outcome are you hoping for?

Is there anything else you think we should know?

Do you require any support or reasonable adjustments during the investigation?

For office use only:

Received by:	Date received:
Acknowledged to whistleblower:	Date:
Investigating officer assigned:	Date:
Investigation completed:	Date:
Outcome communicated to whistleblower:	Date: