Enabling all to flourish
rooted in God's love

Trust

Whistleblowing Policy

Policy type	**Trust Policy: Tier 1**
Reviewed	**Annually**
Author/Responsible Officer	**Head of People**
Board to be ratified	**Finance, People and Operations Committee**
Approved by	**Trust Board**
Date of ratification	**March 2026**
Date of next review	**September 2027**

This policy is a mandatory policy for all DSA Multi Academy Trust Academies and must be implemented without any amendments

The Diocese of St Albans Multi Academy Trust is a company limited by guarantee.
Registered in England No 10449374 Registered Office: **Manshead CE Academy, Dunstable Rd, Caddington, Luton, LU1 4BB**

OUR POLICY STATEMENT

'Enabling all to flourish rooted in God's love'

JOHN 10:10

Our Trust's mission is to ensure that all pupils are enabled to flourish; academically, socially, spiritually, physically and mentally, rooted in God's Love. This belief is central to our vision and our work in service of our communities, pupils, staff and families and is rooted in our Christian Foundation. Our policies are underpinned by our Trust and Schools Christian Visions, serving a range of different contexts and school communities.

Our commitment to mutual flourishing within the school community is recognised within our policies and procedures and ensures that we are governed by principles that are guided by the central belief of prospering, thriving and growing for all. Our polices are based on the belief that equitable treatment for all pupils, staff and the wider community is essential for ensuring holistic flourishing for all. Each policy is developed collaboratively and draws upon and is informed by the National Church of England Vision and the Diocesan Board of Education Vision. Our polices are adapted to recognise the individuality of each school and its community.

Our policies provide clear expectations for all Trust colleagues and ensures a consistency of approach across our schools and that we are living out our Trust values of Hope, Nurture, Equality, Respect and Collaboration.

Each policy forms part of our Trust Governance and ensures that we are held to the highest standards as we carry out our duties.

Contents

1.	Introduction	4
2.	Aims and scope of this policy	4
3.	Safeguards	5
4.	Confidentiality	5
5.	Anonymous Allegations	5
6.	How to raise a concern internally	6
7.	How to raise a concern externally	6
8.	How the Trust will respond	7
9.	Interim Relief	8
10.	Whistleblower support	8
11.	Untrue and vexatious allegations	8
12.	Monitoring and Review	8

1. Introduction

1.1 The Trust is committed to the highest possible standards of openness, probity and accountability. This policy provides a means for anyone associated with the Trust who has serious concerns about any aspects of practice to come forward and voice those concerns, irrespective of seniority or status without fear of reprisal. Furthermore, to enable those who wish to raise serious concerns to be able to do so in a way that will not be seen as being disloyal to their colleagues or to the Trust.

1.2 This policy makes it clear that 'whistleblowers' can raise concerns that are in the public interest without fear of victimisation, or subsequent discrimination or disadvantage. The aim is to encourage and enable workers to raise serious concerns within the Trust rather than overlooking the problem or reporting the matter externally. This policy ensures that the Trust complies with its duty under the Public Interest Disclosure Act 1998.

2. Aims and scope of this policy

2.1 The Whistleblowing Policy should be used to raise serious concerns that fall outside the scope of other procedures, or where workers may lack the confidence or be too fearful to use these procedures.

2.2 This policy should not be used for conduct which can be dealt with through the Trust's normal procedures, for example grievances or complaints. Wherever possible, issues such as these should be resolved through the usual management channels by discussion and open dialogue.

2.3 This policy is in addition to the Trust's complaints procedures and other specifically laid down statutory reporting procedures such as referrals to the Disclosure and Barring Service or Teacher Regulation Agency.

2.4 For the purpose of this policy, the term 'worker' will include all workers of the Trust. It also applies to volunteers, supply or agency staff and contractors working for the Trust or on the premises.

2.5 This policy aims to:

- encourage workers to feel confident in coming forward with serious allegations
- provide a means for workers to make serious allegations and receive feedback on any action taken
- ensure confidentiality if required
- reassure workers that they will be protected from possible reprisals or victimisation
- reassure workers that they will suffer no detriment or disadvantage from making allegations as long as they do so in the public interest, genuinely believing their allegations to be valid.

2.6 Examples of serious concerns that may be reported under the whistleblowing policy may include:

- fraudulent or improper use of the academy's/trust's money or assets
- breach of health and safety policy or practice including dangerous practices at work
- breach of child protection policy/legislation
- criminal activity

- alleged miscarriage of justice
- unethical conduct
- abuse of authority
- failure to comply with legal obligations or regulatory requirements
- maladministration, misconduct or malpractice
- damage to the environment
- bribery
- sexual harassment of workers or failure to take reasonable steps to prevent it
- breach of equality and discrimination legislation
- modern slavery
- concealment of any of the above

These are examples; the list is not exhaustive.

2.7 Should workers wish to seek other independent advice in relation to whistleblowing, advice can be sought from their trade union representative or the whistleblowing charity 'Protect' (https://protect-advice.org.uk/) provides further advice and information.

2.8 This policy does not form part of any worker's contract of employment, and it may be amended at any time.

3. Safeguards

3.1 The Trust recognises that the decision to raise a serious concern can be a difficult one to make. However, workers who raise serious concerns that are in the public interest will have nothing to fear because they are doing their duty to the employer and those for whom you are providing a service.

3.2 The Trust will not tolerate any harassment or victimisation (including informal pressure) and will take appropriate action to protect a worker who raises a concern in good faith. Workers that raise concerns about sexual harassment will be protected.

3.3 Any investigation into allegations of potential malpractice will not influence or be influenced by any employment procedures (e.g. disciplinary) that may already affect the worker, if they are a worker

4. Confidentiality

4.1 All concerns will be treated in confidence, and every effort will be made not to reveal a worker's identity if they so wish. However, if the matter is subsequently dealt with through the Trust procedures, e.g. the disciplinary procedure, the worker may need to come forward as a witness if the matter is to be dealt with effectively.

5. Anonymous Allegations

5.1 This procedure encourages people to put their name to an allegation whenever possible.

5.2 Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Trust.

5.3 In exercising this discretion, the factors to be taken into account include:

- the seriousness of the issues raised;
- the credibility of the allegation;
- the likelihood of confirming the allegation from attributable sources and information

6. How to raise a concern internally

6.1 As a first step**,** the worker should normally raise concerns with their immediate line manager. This, however, may depend on the seriousness and sensitivity of the issues involved and who is suspected of any malpractice. If the worker believes their line manager is involved, they should approach the Headteacher or Head of People.

6.2 Should a worker feels unable to approach the Headteacher or Head of People, or if it is about the Headteacher or Head of People, they should contact the CEO of the Trust or Chair of Trustees/Board.

6.3 The dedicated email address of Whistleblowing@stalbansdmat.co.uk can also be used and the concern would be passed to the appropriate person to manage.

6.3 Concerns may be raised verbally or in writing. Whether a written or verbal report is made, it is important that the following information is provided:

- the name of the worker making the allegation and a contact point. As referred to above it will be more difficult for the Trust to pursue issues if concerns have been expressed anonymously.
- the background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation)
- the particular reason for the allegation and concern

7. How to raise a concern externally

7.1 Should a worker be unsatisfied with action taken by the Trust, they may feel it is right to raise the matter externally, in which case there are the following contact points:

- The Education & Skills Funding Agency
- The Department for Education
- The police
- A relevant voluntary organisation

7.2 Other external organisations include:

- 'Protect' 0203 117 2520 or https://protect-advice.org.uk/
- Keeping Children Safe in Education (KCSIE) and the NSPCC whistleblowing helpline 0800 028 0285 or help@nspcc.org.uk
- Recognised Trade Union
- Local Authority
- Diocese
- External Auditor
- Solicitor.

7.3 The manager should stress to the worker that if they choose to take a concern outside the school, it is the worker's responsibility to ensure that confidential information is not disclosed, i.e., confidential information, in whatever format, is not handed over to a third party.

7.4 Concerns about safeguarding practices can be raised externally using the NSPCC whistleblowing helpline. Workers can call 0800 028 0285 or email help@nspcc.org.uk.

7.5 If a worker does decide to raise the matter externally, they should ensure that they do not disclose confidential information or that disclosure would be privileged. Whistleblowers are encouraged to approach the Charity, "Public Concern at Work" before reporting a concern to any external bodies or individuals.

8. How the Trust will respond

8.1 The Trust will respond to all allegations made under this procedure. Any manager receiving a complaint under this procedure must contact the Headteacher/CEO of the Trust to inform them of this and to seek advice on the appropriate steps.

8.2 Initial enquires may be made to assess whether further investigation is appropriate and if so, by whom and what form it should take. Concerns or allegations that fall within the scope of specific areas, for example child protection or discrimination will normally be referred for consideration under the appropriate procedure; advice may be sought from the Head of People. Where appropriate, the matters of concern may have to be referred to the police and external auditors.

8.3 Within ten working days of an allegation being made, the Trust will write to the worker who raised the concern (unless they have requested not to be contacted or to be contacted in a different way, other than by letter/email), acknowledging that the allegation has been received and advising the worker of the next steps.

8.4 Where an investigation is the appropriate course of action, the Trust will appoint a suitable investigator at the earliest available opportunity. Subject to the seriousness and nature of the disclosure, this may be an appropriate member of Trust staff, governor, Trustee or an external party.

8.5 Once the Trust has appointed an investigator, they will be required to contact the worker at the earliest available opportunity, and in any event, no later than ten working days from the date of their appointment.

8.6 Where the allegation has been made internally and anonymously, the Trust will be unable to communicate what action has been taken.

8.7 If any disciplinary action is required, HR advise will be sought.

8.8 The amount of contact necessary between the investigating officer and the worker raising the concern will depend upon the nature of the matters raised, the potential difficulties involved and the clarity of the information provided.

8.9 Where any meetings are arranged with the worker, the worker has the right to be accompanied by a trade union representative or work colleague.

8.10 The Trust will take steps to minimise any difficulties which the worker may experience as a result of raising a concern, for example if the worker is required to provide evidence in a criminal or disciplinary proceeding, the Trust will arrange for support to be given about such proceedings.

8.11 The Trust accepts that workers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, those making allegations will be informed of the outcome of any investigation as appropriate.

9. Interim Relief

9.1 Workers who believe they have suffered detriment for whistleblowing may be able to seek interim relief through an employment tribunal, and during this period the Trust will not take retaliatory action during any such proceedings.

10. Whistleblower support

10.1 Support during the process may be accessed via:

- The Trusts employee assistance programme
- Trade union representation

11. Untrue and vexatious allegations

11.1 If a worker makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, a worker makes an allegation maliciously, frivolously or for personal gain, disciplinary action may be taken.

12. Monitoring and Review

12.1 The Headteacher/CEO will be responsible for monitoring the implementation and effectiveness of this policy/procedure. The policy/procedure will be reviewed by the Trust Board as necessary.