Whistleblowing Policy

Person responsible for policy:	HR Director
Revised:	December 2025
Review Date:	December 2027

Introduction

1. This document explains the types of concerns that can be raised under this procedure, the legal protection for whistleblowers and how whistleblowing concerns will be handled.

2. This procedure should be followed for any whistleblowing matters raised by employees of the school, supply staff and agency workers.

3. The term 'headteacher' has been used throughout this procedure, however depending on the size and structure of the school the headteacher's role in the procedure may be delegated to other members of the senior leadership team, school business managers or line managers as appropriate. Where the headteacher is subject to these procedures, it will be managed by the Chair of the governing body.

Policy Statement

4. The River Learning Trust is committed to the highest possible standards of openness, integrity and accountability. In line with that commitment we encourage employees with serious concerns about any aspect of the Trust's work to come forward and express those concerns.

Aim of procedure

- To encourage those working in the school to report suspected wrongdoing promptly, in the knowledge that it will be taken seriously.
- To provide guidance on how to raise concerns.
- To reassure staff that they are able to raise genuine concerns made in the public interest without fear of reprisals, even if they turn out to be mistaken.

What is Whistleblowing?

5. Whistleblowing is when a worker reports certain types of wrongdoing or misconduct within an organisation.

6. The wrongdoing disclosed must be in the public interest. This means it must affect others, e.g. pupils, general public.

7. The wrongdoing must relate to or show one of the following:

- a criminal offence
- a failure to comply with a legal obligation
- a possible miscarriage of justice
- a Health & Safety risk
- damaging the environment
- misuse of public money
- corruption or unethical conduct
- abuse of pupils, students or other users
- deliberate concealment of any of these matters

- sexual harassment
- any other substantial and relevant concern.

8. The concern could be about something that happened in the past, is currently happening or likely to happen in the future.

9. Concerns or complaints that employees wish to raise formally, about their own employment, should normally be raised using RLTs Grievance Procedure, unless the employee believes the concern is in the public interest. This includes for example, concerns related to working conditions, working relations, employment rights or bullying or harassment.

Legal protection for whistleblowers

10. Whistleblowers are protected by law from being treated unfairly or losing their jobs because they 'blow the whistle'.

11. Whistleblowers must hold a reasonable belief that the concern they are raising is in the public interest.

12. The Trust will provide all reasonable protection for those who raise concerns made in the public interest.

13. The Trust will be responsible for ensuring that appropriate personal support is offered both to a worker raising a concern and to any worker against whom allegations have been made under this procedure.

14. Although an employee has certain legal obligations of confidentiality to the school, in a limited set of circumstances, whistleblowing may override these obligations. This guidance sets out the circumstances under which these disclosures may lawfully be made.

15. If an employee raises a concern in good faith but it is not subsequently confirmed by investigation, no action will be taken against them. If however, an employee raises a concern frivolously, maliciously or for personal gain, disciplinary action may be taken against them.

Procedure for raising a whistleblowing concern

Whistleblowing anonymously or confidentially

16. Concerns can be raised anonymously, but the school or person receiving the allegation may not be able to take it further if they haven’t been provided with all the information they need.

17. Whistleblowers can give their name but request confidentiality and in these circumstances, every effort will be made to protect their identity.

18. All disclosures made under this procedure will be treated sensitively, consistently and fairly.

Step 1- Deciding who to report the concern to

19. Concerns can be raised verbally or in writing.

20. You can raise your concern with your line manager. Alternatively, you can raise the matter directly with the Headteacher or the Chair of Governors.

21. If you wish to report the matter to someone outside of the school you can contact the Trust's Chief Executive or Chair of Trustees in the first instance as listed in Annex 1

22. If you are a member of the Trust Central team you can raise your concern with the Chief Executive, or the Chief Operating Officer alternatively you can raise the matter with the Chair of Trustees.

23. Reporting concerns to the media, in most cases will lead to the loss of your whistleblowing law rights.

24. Although you are not expected to prove beyond doubt the truth of your concerns, you will need to demonstrate that you have sufficient evidence or other reasonable grounds to raise them.

25. You may wish to obtain advice from a trade union representative, the Citizen's Advice Bureau or Protect Tel: 020 3117 2520 www.protect-advice.org.uk.

26. You can be accompanied by a trade union representative or colleague to any meetings that are required.

Step 2

27. The person with whom you have raised your concern, will decide what action is needed. They may ask you to provide further information. They will write to you within 10 days to let you know how your concern will be dealt with.

28. The information you can expect to receive is:
    - an indication of how the concern will be dealt with
    - an estimate of how long it will take to provide a final response
    - whether any initial enquiries have been made
    - whether further investigations will take place, and if not why not
    - information about support available for you.

29. The person with whom you have raised your concern will at the same time notify the Trust's HR Director that a whistleblowing allegation has been made.

30. Advice on dealing with concerns is available from the Trust's HR Director.

Step 3

31. Initial enquiries will be made to decide whether an investigation is appropriate.

32. An investigation may be carried out, depending on the nature of the allegations and the evidence/information presented. Full details of the investigation may be withheld from you to protect the confidentiality of other people.

33. Information will need to be passed on to those with a legitimate need to have this information and it may be necessary for you to provide a written statement and act as a witness in any subsequent disciplinary proceedings or enquiry. This will be discussed with you first.

34. Where an investigation is necessary, it may take the form of one or more of the following:
    - an internal investigation by the head teacher or a governor, which may, for example, take the form of a disciplinary investigation
    - an investigation by the Trust Central Finance team which could include an internal audit review.
    - An investigation escalated to and led by the Trust Central HR Team
    - a referral to the Police
    - the setting up of an external independent inquiry at the direction of the COO or CEO

Step 4

35. You will be informed of the outcome of any investigation, in writing, and/or of any action taken, subject to the constraints of confidentiality and the law.

36. If you do not feel your concern has been addressed adequately you should ensure that it has been reviewed at the highest level in the Trust (CEO, Chair of Trustees)

37. If you have received response from the CEO or Chair of Trustees and you do not feel it has been addressed adequately you may raise it with an independent body such as one of the following as appropriate:
    - your trade union
    - the Citizens Advice Bureau
    - a relevant professional body or regulatory organisation
    - a relevant voluntary organisation
    - the Police
    - the Local Government Ombudsman
    - Equality and Human Rights Commission

(See Annex 2 for further details).

38. If there is an issue of an exceptionally serious nature which you believe to be substantially true, then you may disclose the issue to someone other than those listed in paragraph 21. In determining whether it is reasonable for you to have made a disclosure the identity of the person to whom the disclosure is made will be taken

into account. Disclosures to anyone outside of the recognised bodies listed in paragraphs 35 and Annex 1 and 2 may not be protected disclosures under the Act.

39. You have a duty to the school not to disclose confidential information. This does not prevent you from seeking independent advice at any stage or from discussing the issue with the charity Protect 020 3117 2520 www.protect-advice.org.uk..

Annex 1 - Contact list for the River Learning Trust

Chief Executive, Paul James	Tel: 07789 276205 Email: pjames@riverlearningtrust.org
Chair of Trustees, Jeremy Long	Email: chairoftrustees@riverlearningtrust.org

If you wish to report the matter to someone outside of the school, please see Annex 2

Annex 2 - External bodies and organisations

You can blow the whistle to an external organisation rather than your employer. There is a list of prescribed people or bodies that you can go to. Choose the correct one for your issue. A full list can be found online at gov.uk:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/431221/bis-15-289-blowing-the-whistle-to-a-prescribed-person-list-of-prescribed-persons-and-bodies-2.pdf

Ofsted	Piccadilly Gate, Store Street, Manchester, M1 2WD Tel: 0300 123 3155 Email: whistleblowing@ofsted.gov.uk
National Society for the Prevention of Cruelty to Children (NSPCC)	The NSPCC Whistleblowing Advice Line is for anyone with child protection concerns in the workplace. The helpline provides support and advice to those who feel unable to get a child protection issue addressed by their employer. It can be contacted anonymously on 0800 028 0285.
Health and Safety Executive	Tel: 0300 003 1647 Online form: www.hse.gov.uk/contact/raising-your-concern www.hse.gov.uk
The Local Government Ombudsman	Address: PO Box 4771, Coventry. CV4 0EH www.lgo.org.uk Tel no. 0300 061 0614
Data Protection and Freedom of Information	The Office of the Information Commissioner, Wycliffe House, Water Lane, Wilmslow, SK9 5AF Tel: 0303 123 1113 Email: casework@ico.gsi.gov.uk