



WHISTLEBLOWING POLICY

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Contents

PART A - POLICY	3
1. POLICY STATEMENT	3
2. SCOPE.....	3
3. LEGISLATION & DEFINITIONS	4
 PART B - PROCEDURE	 5
4. WHEN TO RAISE A CONCERN	5
5. WHO TO REPORT TO	5
6. HOW TO RAISE THE CONCERN	5
7. INVESTIGATING THE CONCERN	5
8. OUTCOME OF THE INVESTIGATION	6
9. MALICIOUS OR VEXATIOUS ALLEGATIONS	6
10. ESCALATING CONCERNS BEYOND THE TRUST	6
 APPENDICES.....	 8
1. CONTACT LIST.....	8
2. WHISTLEBLOWING: LIST OF PRESCRIBED PEOPLE AND BODIES	8
3. PROTECT.....	8

PART A - POLICY

1. POLICY STATEMENT

1.1 The aims of this policy are to:

- Encourage individuals affected by suspected wrongdoing to report it as soon as possible in the knowledge that their concerns will be taken seriously and investigated, and that their confidentiality will be respected.
- Let all staff in the Trust know how to raise concerns about potential wrongdoing in or by the Trust.
- Set clear procedures for how the Trust will respond to such concerns.
- Assure staff that they will not be victimised for raising a legitimate concern through the steps set out in the policy, even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue).

1.2 The Trust is committed to ensuring that the process for dealing with concerns is fair and transparent, with adherence to the following principles:

- All concerns raised by whistleblowers in accordance with the procedures outlined in this policy will be responded to properly and fairly.
- Employees and the Trust will treat the content of any whistleblowing concern as confidential and will only involve other individuals where absolutely necessary. Careful consideration will be given to how much any individual needs to know in order to fulfil their role in the process.
- Whistleblowers will not suffer any detrimental treatment as a result of raising a genuine concern.

1.3 This policy should be read in conjunction with the following policies, which can be located on the GLT Knowledge Base:

- Staff Anti-Harassment & Bullying Policy
- Staff Code of Conduct
- Grievance Policy
- Disciplinary Policy
- Complaints Policy
- Safeguarding & Child Protection Policy.

2. SCOPE

2.1 This policy applies to all employees or other workers who provide services to the Trust in any capacity, including some self-employed consultants or contractors who provide services on a personal basis and agency workers, who are covered by the Public Interest Disclosure Act 1998 which protects whistleblowers.

2.2 Trustees, volunteers or self-employed workers who own a limited company in an arrangement where the Trust is the customer or client are not covered by the Public Interest Disclosure Act 1998, however, are encouraged to follow the procedure for whistleblowing outlined in Part B – Procedure.

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

3. LEGISLATION & DEFINITIONS

3.1 The requirement to have clear whistleblowing procedures in place is set out in the Academy Trust Handbook.

3.2 This policy has been written in line with the above document, as well as government guidance on whistleblowing. The policy also takes into account the Public Interest Disclosure Act 1998 (PIDA).

3.3 Whistleblowing covers concerns made that report wrongdoing that is 'in the public interest'. This means that it must affect others, for example the general public.

3.4 For a disclosure to qualify for protection the information must fall within one or more of the following categories of malpractice or failure that the law sets out as follows:

- i. Criminal Offence
- ii. Failure to comply with a legal obligation, including a breach of any statutory requirement.
- iii. Sexual harassment
- iv. Miscarriage of justice, including matters likely to lead to a wrongful conviction.
- v. Health and Safety risks, encompassing risks to any individual whether they are a worker or not.
- vi. Environmental damage, including any wrongdoing that endangers or damages the environment.
- vii. Cover up, including information that shows the deliberate concealment of information about any of the above wrongdoings.

3.5 A whistleblower is a person who makes a protected disclosure which they reasonably believe shows a category of wrongdoing as set out in the law, summarised in 3.4 above.

3.6 A whistleblower is protected by the PIDA from negative treatment or unfair dismissal because they have raised a whistleblowing concern.

3.7 Not all concerns about the Trust, or individual schools in the Trust, count as whistleblowing. For example, personal staff grievances such as bullying or harassment (except sexual harassment) are not usually covered by whistleblowing law, unless the particular case is in the public interest. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely to be a grievance.

3.8 When staff have a concern they should consider whether it would be better to follow a different policy, as listed in section 1.3. The whistleblowing charity, Protect (formerly Public Concern at Work), has further guidance on the difference between a whistleblowing concern and a grievance that staff may find useful if unsure. Further details can be found in the appendices.

PART B - PROCEDURE

4. WHEN TO RAISE A CONCERN

- 4.1 Staff should consider the categories in clause 3.4 above when deciding whether their concern is of a whistleblowing nature.
- 4.2 Staff can raise their concern at any time about an incident that happened in the past, is happening now, or they believe will happen in the future.
- 4.3 Staff can raise their concern anonymously (for example via an anonymised email address or letter) but should be aware that the Trust may not be able to take the complaint further if staff have not provided all the information needed. A whistleblower who is concerned about possible reprisals if their identity is revealed should make this clear when reporting the concern so that the recipient of the complaint can take appropriate measures.
- 4.4 If the staff member provides their name but requests confidentiality, the Trust will make every effort to protect their identity but, depending on the specific circumstances of the concern, this may limit the breadth and depth of any investigation. It should also be appreciated that the investigation may reveal the source of the information and statements made by the whistleblower may be required as part of the evidence.

5. WHO TO REPORT TO

- 5.1 School-based staff should report their concern to their Headteacher or CEO. If the concern is about their Headteacher, it should be reported to the CEO. If the concern is about the CEO, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the Chair of Trustees.
- 5.2 Shared professional services staff should report their concern to the CEO. If the concern is about the CEO or it is believed the CEO may be involved in the wrongdoing in some way, the staff member should report the concern to the Chair of Trustees.
- 5.3 Contact details for the above-mentioned people can be found in the appendices.

6. HOW TO RAISE THE CONCERN

- 6.1 Concerns should be made in writing wherever possible.
- 6.2 A concern must contain factual content and be specific, as opposed to saying an opinion or making an allegation. As an example, it should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interests in the matter.
- 6.3 The whistleblower will not have a say in how the concern is dealt with.

7. INVESTIGATING THE CONCERN

- 7.1 When a concern is received the recipient will usually:
 - Meet with the whistleblower within a reasonable timeframe. A member of the Trust HR team will be present to take notes. The whistleblower may be accompanied by a work colleague, a trade

union official, or workplace trade union representative who is certified by their union to act as a companion.

- 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 whistleblowing nature, the recipient should handle the concern in line with the appropriate policy/procedure.
- Reiterate at the meeting that the whistleblower is 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 arrange a further investigation into the matter involving other stakeholders as appropriate. In some cases they may bring in an external, independent body to investigate. In others, they may need to report the matter to the police.
- The whistleblower should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps.

8. OUTCOME OF THE INVESTIGATION

- 8.1 Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating manager 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 or police.
- 8.2 They will inform the whistleblower about the action they are taking, though certain details may be restricted due to confidentiality. For example, if the concern relates to another individual, this would be confidential information between the Trust and the individual.
- 8.3 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.
- 8.4 Whilst the Trust cannot always guarantee the outcome sought, concerns will be dealt with fairly and in an appropriate way.

9. MALICIOUS OR VEXATIOUS ALLEGATIONS

- 9.1 Staff are encouraged to raise concerns when they believe there to potentially be an issue, and all concerns will be investigated.
- 9.2 If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern.
- 9.3 Where the evidence clearly points to the complaint being wholly unfounded or deliberately designed to mislead or cause trouble for someone at work, it may be deemed appropriate to commence disciplinary proceedings against the complainant.

10. ESCALATING CONCERNS BEYOND THE TRUST

- 10.1 The Trust encourages staff to raise their concerns internally, in line with this policy, but recognises that staff may feel the need to report concerns to an external body. A list of prescribed bodies to whom staff can raise concerns is available on the government website, linked in the Appendices.

10.2 The Protect advice line can also help staff when deciding whether to raise the concern to an external party. Further details are within the Appendices.

APPENDICES

1. CONTACT LIST

As per section 5 of the policy, please contact one of the following people to raise your whistleblowing concern.

Position	Name	Email
GLT Chief Executive Officer	Dr Tom Flynn	tflynn@girlslearningtrust.org
Headteacher – Carshalton High School for Girls	Peter Baumann-Winn	pbaumannwinn@carshaltongirls.org.uk
Headteacher – Nonsuch High School for Girls	Alexis Williamson-Jones	Williamson-jones@nonsuchschool.org
Headteacher – Wallington High School for Girls	Tracey O'Brien	tobrien@wallingtongirls.org.uk
Chair of Trustees	Emily Tofield	etofield@girlslearningtrust.org.uk

2. WHISTLEBLOWING: LIST OF PRESCRIBED PEOPLE AND BODIES

As per section 10 of the policy, where staff feel the need to report concerns to an external body, the list of prescribed people and bodies can be found on the government website:

[Whistleblowing: list of prescribed people and bodies](#)

3. PROTECT

As per section 3.8 of the policy, if any staff member has any doubt regarding the nature of their concern and the best policy / procedure to follow, they can contact the independent whistleblowing charity, Protect, as follows:

Website: [Whistleblowing or grievance? | Protect - Speak up stop harm \(protect-advice.org.uk\)](#)

Phone: 0203 117 2520