



The Rivers
C.of E. Academy Trust

Whistleblowing Policy and Procedure

Committee	People, Pay and Performance Committee
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This document sets out the regulations for the MAT and all member academies

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Introduction

People working within organisations are often the first to recognise when something may be seriously wrong within their workplace. The Rivers C.of E. Academy Trust is committed to maintaining the highest standards of openness, probity, and accountability. This commitment underpins our responsibility to safeguard pupils, staff, and the wider school community, while supporting all stakeholders to act responsibly and in the public interest.

The Rivers C. of E. Academy Trust's Whistleblowing Policy promotes a culture of openness, honesty, and integrity. It sets out clear procedures for raising concerns about suspected wrongdoing, malpractice, or unsafe practices, ensuring that such concerns can be reported confidentially and without fear of reprisal. The policy enables staff and others to raise concerns or allegations with confidence, and ensures that these concerns are handled sensitively, appropriately, and in a timely manner.

This policy meets statutory requirements and reflects the Trust's commitment to safeguarding, ethical practice, and compliance with relevant legislation and guidance.

The Trust takes responsibility for ensuring that all staff are aware of this policy and understand the procedures for raising and managing concerns. All disclosures made by whistleblowers will be treated seriously, fairly, and in accordance with established procedures.

Vision and Values

The Rivers C. of E. Academy Trust is committed to providing an extraordinary education for every pupil, underpinned by each of our key themes **Extraordinary Education, Extraordinary People, Extraordinary Futures**.

We strive to create an environment where all staff feel valued, supported, and empowered to contribute to the best possible outcomes for pupils. We encourage a culture in which individuals have the confidence to speak up, be innovative, and act with integrity.

Our values promote collaboration, continuous learning, and professional development, ensuring that all members of our community can thrive. We recognise that fostering openness and trust is essential to maintaining high standards and achieving our shared vision for excellence.

Definitions

Whistleblowing

Whistleblowing is the name given to the disclosure of information to an employer or a relevant authority by an individual who knows, or reasonably suspects, that the organisation has been involved in, or is responsible for, wrongdoing.

Employees making qualifying disclosures are protected against dismissal or detriment by Part IV of the Employment Right's Act 1996.

Qualifying Disclosures

Certain disclosures are prescribed by law as “qualifying disclosures.” A “qualifying disclosure” means a disclosure of information that you genuinely and reasonably believe is in the public interest and shows that the Organisation has committed a “relevant failure” in one of the following areas:

- That a criminal offence has been committed, is being committed or is likely to be committed.
- That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he/she is subject.
- That a miscarriage of justice has occurred, is occurring or is likely to occur.
- That the health and safety of any individual has been, is being or is likely to be endangered.
- That the environment has been, is being or is likely to be damaged.
- That information tending to show any matter falling within any of the above has been or is likely to be deliberately concealed.

This procedure is not designed to be a substitute for the trust’s disciplinary or grievance procedures.

Guiding Principles of Reporting

Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Employees should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.

If you are in any doubt as to whether a concern is valid, you should report it, and the trust can decide to what extent it will be investigated.

An instruction to cover up wrongdoing is a disciplinary matter. If you are told not to raise or pursue any concern, even by a person in authority, you should not agree to remain silent. You should report the matter in accordance with this policy.

Independent Advice

This policy is designed to help staff with any whistleblowing concerns and procedures, but the trust understands that some staff may wish to get advice from independent external agencies.

Advice is available from a trade union representative (if applicable) or [Protect](#) (an independent charity).

Wider Disclosure

We encourage all our staff to follow the internal procedures outlined in this policy but understand that in some cases staff may feel it is necessary to take concerns to external agencies.

Under the terms of the Public Interest Disclosure Act 1998, you may take your concerns to an external agency where you reasonably believe that:

- You would be victimised by the trust/school/setting.
- Evidence that you submit in relation to the concern would be concealed or destroyed by the trust/school/setting.
- You have previously made a disclosure of substantially the same nature.

We urge staff who take their concerns to external agencies are careful not to disclose any confidential information. Information that is confidential and should therefore not be disclosed should be outlined in your contract of employment.

It is unlawful to publish any information which may lead to the identification of a worker who is subject to an allegation.

A list of external agencies/appropriate bodies can be found within Government whistleblowing guidance: [Whistleblowing: list of prescribed people and bodies - GOV.UK](https://www.gov.uk/guidance/whistleblowing-list-of-prescribed-people-and-bodies).

Confidentiality

We are committed to protecting the identity of whistleblowers and will not disclose it without your consent. However, there may be circumstances where this cannot be guaranteed. This may occur, for example, where disclosure is required by law, or where the whistleblower is required to provide evidence in formal proceedings. The investigating officer will discuss this with the whistleblower and identify whether it is possible to proceed.

In situations where a whistleblower's identity must be disclosed, the trust will take all reasonable steps to support those involved and to protect them from any form of discrimination, victimisation, or unfair treatment.

Confidentiality will be maintained throughout an investigation process and will continue to apply after an investigation has concluded. All staff are expected to respect and uphold confidentiality. Any breach of confidentiality, particularly where information is disclosed knowingly, unnecessarily, or with malicious intent, may result in disciplinary action.

Anonymous Allegations

Concerns expressed anonymously, may be considered under this whistleblowing procedure, especially those relating to the welfare of children. When determining whether an anonymous allegation will be investigated further, will take the following factors into account:

- The seriousness of the issue raised
- The credibility of the concern
- The likelihood of obtaining the necessary information in order to confirm the allegation.

Deliberately False or Malicious Allegations

The trust encourages all staff to voice their concerns and allegations safe in the knowledge that those who make allegations in good faith, that do not prove to be true, will not be reprimanded.

Disciplinary action may be considered against staff who make claims that are found to be knowingly false, malicious, vexatious or for personal gain.

Whistleblowing Procedure

The trust will investigate allegations and concerns thoroughly, but the act of the investigation does not indicate the trust has accepted the allegations as true.

If wrongdoing in the workplace is suspected:

- Staff must not approach or accuse the individual directly.
- Staff must not try to investigate the matter.
- Staff must not convey such suspicions to anyone else other than those with the proper authority.

Step 1 – Raising a concern

- Staff will raise their concern in person, or preferably in writing, with a trust/school/setting leader. This may be
 - o Their line manager
 - o A member of the leadership team
 - o Headteacher/head of setting.
- If their headteacher/head of setting is the subject of their concern staff will raise their concern with their Hub Director.

- Staff are able to raise any concerns directly with their Hub Director, CEO or Chair of the Board, but will be asked to give reason as to why they felt unable to raise their concern with their line manager or school/setting leaders.
- When setting out the concern, it should include as much detail as possible. For example, set out the background and history of the concern, giving names, dates and places, and explaining the reasons for concern.

Step 2 – The role of the trust/school/setting leader

- Once an allegation has been brought to the attention of a leader, they will decide upon the next course of action.
- If the concern has been raised verbally, they may ask for it to be put in writing.
- If the leader decides that it is a genuine concern, and that it is appropriate to follow the whistleblowing procedure, they will escalate the matter to an executive leader (Hub Director; CEO or Chair of the Board) who will identify and allocate an investigating officer.

Step 3 – Deciding upon a course of action

- The investigating officer will decide whether further investigation is appropriate and, if so, what form it should take.
- It is expected that the investigating officer will either be the Headteacher or Hub Director, however this may be allocated to an alternative person if appropriate.
- The investigating officer will initially consider other procedures such as the Allegations of Abuse against Teachers and other Staff (in cases of safeguarding) and immediately contact the Director of Inclusion (the member of the executive team overseeing safeguarding) and/or LADO for advice.
- If the concern is unrelated to a qualifying disclosure, then the investigating officer should halt the use of this procedure and instead refer the employee to the grievance or other relevant procedure.

Step 4 – Written acknowledgement

Once the investigating officer has considered the issue(s) they will write to you within 10 working days of the concern being raised. Information will include:

- Acknowledgement that the concern has been received.
- Identification of how they propose to deal with the matter.
- An estimation (so far as reasonably practical) of how long it will take to provide a final response.
- Information advising whether any initial enquiries have been made.
- Information advising whether further enquiries will take place.
- Details of support available whilst matters are investigated.
- Confirmation of confidentiality where possible, explaining that it may not be possible that you remain anonymous.

Step 5 – Investigation process

The investigating officer may decide it is necessary to meet with you to seek further information/clarification. Where a meeting is arranged you have the right to be accompanied by a trade union representative (if applicable) or a colleague who is not involved in the matter(s) of concern. The investigating officer may also feel it is necessary to collect further evidence and interview witnesses as part of the investigation process.

During the investigation process the investigating officer may feel it is appropriate to refer matters to:

- the ESFA (Education and Skills Funding Agency), due to concerns about financial loss or irregularity,
- the police, due to concerns of a criminal nature,

- the trust's safeguarding lead in relation to child safeguarding concerns and LADO if the concerns relate to a member of staff.

The investigation process will aim to be completed within 20 working days of the matter being raised with the investigating officer. However, enquiries may extend beyond this timescale in some more complex cases.

Step 6 – Possible outcomes

Following the investigation process, the investigating officer will write up their findings and recommendations. They will be provided, in the form of a report, to an executive leader so further action can be determined (if required).

The investigating officer may determine that:

- There is no evidence to support the matters raised and no further action is required.
- Allegations have been proven and that it is appropriate to take action in accordance with the disciplinary procedure or other relevant action.
- The outcome is currently unknown because matters have been referred to other parties for further investigation e.g., police, audit, social services, legal, DBS or TRA (Teaching Regulation Agency).
- The allegation is found to be malicious and will be investigated as a conduct issue under the disciplinary procedure.

Subject to legal constraints, the whistleblower will receive a copy of the report.

If a whistleblower is dissatisfied and believes their allegation has not been addressed appropriately or taken seriously, they may raise the matter with the relevant authority. All leaders are committed to handling allegations fairly, thoroughly, and effectively.

Useful Contacts

To identify a member of the executive leadership team who you wish to contact, please visit The Rivers C.of E. Academy Trust [website](#) for up-to-date staffing structures, or email info@riverscofe.co.uk.

To access impartial advice from Protect (an independent charity) please visit the website [Protect | Speak Up, Stop Harm](#).

To access the Government Whistleblowing Guidance: List of prescribed people and bodies please visit the website [Whistleblowing: list of prescribed people and bodies - GOV.UK](#).