SOLENT
Academies Trust

Together we inspire lifelong learning, perseverance, kindness and growth, transforming the lives of our children and families

Whistleblowing Policy and Procedure

Scope:	Trust Policy
Name of Responsible Officer:	Chief Executive Officer
Approving Committee:	Audit and Risk Committee / Full Board
Statutory Basis:	Statutory Policy
Requirement to publish on website:	Yes
Date Reviewed	July 2026
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1. Policy Statement

Solent Academies Trust is committed to achieving the highest possible standards of probity and integrity regarding its practices. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

This policy has been implemented following consultation with the recognised trade unions. It has been formally adopted by the Audit & Risk Committee and Trust Board.

This policy does not form part of any employee's contract of employment or other contract to provide services and we may amend it at any time.

2. Scope & Purpose

1.1 The aims of this policy are:

- To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide staff with guidance on how to raise concerns.
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

2.2 This policy applies to all employees of the Trust, governors, consultants, contractors, casual and agency staff and volunteers (collectively referred to as staff in this policy).

3. What is whistleblowing?

3.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. The law provides protection for workers who raise legitimate concerns about specified matters or "qualifying disclosures". A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that there are wrongdoing or dangers at work. This may include:

- criminal activity
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;

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- failure to comply with any legal or professional obligation or regulatory requirements;
- bribery;
- financial fraud or mismanagement.
- negligence;
- breach of our internal policies and procedures [including our Code of Conduct];
- conduct likely to damage our reputation or financial wellbeing;
- unauthorised disclosure of confidential information;
- unethical behaviour; and
- the deliberate concealment of any of the above matters.

3.2 A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy and we will seek to agree with you under which policy the matter being reported will be dealt with.

3.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure.

3.4 If a complaint relates to your own personal circumstances but you also have wider concerns regarding one of the areas set out at 3.1 above (for example, a breach of our internal policies), you should discuss with a member of the Academy or Trust's leadership team which route is the most appropriate.

3.5 If you are uncertain whether something is within the scope of this policy, you should seek advice from a member of Academy or Trust's leadership team

3.6 If your concern is in relation to safeguarding and the welfare of pupils at the academy, you should consider whether the matter is better raised under the academy's child protection policy and in accordance with the arrangements for reporting such concerns, i.e. via the designated safeguarding lead, although the principles set out in the is policy may still apply.

4. Raising a Whistleblowing Concern

4.1 We hope that you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.

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4.2 However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, or they are the subject of the complaint, then you can raise the matter with the following:

Concern about:	Direct Concern to:
Executive Principal/Principal/Head of School	Chair of Academy Committee
A member of the Executive Team	Chief Executive Officer
Chief Finance and Operations Officer	Chief Executive Officer
Chief Executive Officer	Chair of Trustees
Member of Academy Committee	Chair of Trustees
Member of the Board of Trustees	Chair of Trustees
Chair of Trustees	Chair of the Audit and Risk Committee

Protect, a whistleblowing charity formerly known as Public Concern at Work, defines whistleblowing as:

'The raising of a concern either within the workplace or externally, about a danger, risk, malpractice or wrongdoing which affects others.'

Employee's concerns may be raised individually or collectively. If collective concerns are raised staff should be prepared to give their own account during any investigation, should this be required.

There is no time limit for raising a concern, however employees are encouraged to do so at the earliest opportunity since it may be difficult to address a matter if a significant time has elapsed.

If you are unsure who to raise your complaint to, please speak with the HR Department for guidance.

Please refer to Appendix 1 for the appropriate internal contacts.

Concerns may be raised verbally or in writing.

A concern raised in writing should:

- Set out the background and history of the concern giving names, dates, and places where possible
- Give the reason why the employee is particularly concerned about the situation

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- For clarity it would be helpful for the employee to state that they wish their concerns to be addressed under the whistleblowing procedure

An employee is not expected to prove the validity of their concern; however, they will need to demonstrate that there are sufficient and reasonable grounds for their complaint. Further investigation may be hampered if there is only limited evidence to support the concern raised.

An employee may invite a Trade Union representative to support them in raising a concern or raise the matter on their behalf or at a subsequent meeting to explore the complaint.

6 How the Trust will respond

Preliminary enquiries may be made to decide on the appropriate course of action. This may necessitate further discussion with the employee who has raised the concern.

On occasion it may not be appropriate for the person who receives the complaint to progress the concern and the matter may be referred to another individual within our Trust or an external organisation.

It may be possible to resolve some concerns informally by agreed action without the need for further formal investigation.

Where it is not possible to resolve the matter informally, the action taken by our Trust will depend on the nature of the concern and may include:

- Undertaking an internal management or disciplinary investigation
- Referral to the Trust's auditor
- Referral to another regulatory authority
- Referral to the Police
- Referral to the Local Authority

Within 10 working days of receipt of any concern, the person progressing the matter will write to the employee to:

- Acknowledge that the concern has been received
- Indicate how and through whom the Trust proposes to address the matter, including whether further investigation or referral to another organisation will be made
- Give an estimate of how long the investigation will take
- Indicate whether further information will be sought from the employee and the arrangements for obtaining this where known

The form of further contact between the employee and the person progressing the complaint will depend on the nature of the matter raised and the follow up action required.

In instances where an investigation is prolonged or referral to an external agency takes place arrangements will be made to provide the employee with situational updates as far as is

practicable.

On occasion the person considering the complaint may determine that it is not appropriate for further action to be taken. This may include where:

- There is no evidence that malpractice has occurred
- The matter is/has been the subject of internal proceedings under another Trust policy
- The matter is/has been the subject of external legal proceedings/been referred to another external agency
- A false and malicious or vexatious complaint has been made

7 Notification of the Outcome of the Concern

Our Trust recognises that an employee raising a concern would wish to be assured that the matter has been fully addressed. Feedback will be provided on the outcome of the complaint, wherever possible.

In some circumstances however, it may not be appropriate or permissible to share this information (for example where legal, disciplinary, or regulatory authority action is pending, or if sharing information may infringe the duty of confidence owed to a third party). Where it is not appropriate to provide detailed feedback, the employee will be advised that the matter has been addressed or concluded as far as is practicable.

Where a matter is not to be considered further the employee who raised the complaint will be advised of this in writing.

8 How the matter may be taken further

This procedure is intended to provide employees with a mechanism to raise concerns internally within the Trust.

Should this process be exhausted, and the employee feels that matters have not been fully/appropriately addressed, or that concerns are ongoing, they may wish to raise the matter outside of our Trust.

Appropriate contacts are listed at Appendix 1.

An employee who intends to raise a concern externally is encouraged to consider carefully whether this is the most appropriate form of action to resolve the issue and whether all reasonable internal steps have been taken.

If a matter is raised outside of our Trust, an employee should take all reasonable steps to ensure that confidential or privileged information is not disclosed.

9 Protection and Support for Employees

Our Trust will take reasonable measures to support and protect employees who raise concerns.

Protection from Detriment

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Employees raising a concern with reasonable suspicion for doing so will not be subject to discrimination, harassment, or victimisation. Should an employee believe they have been subject to detriment or retribution they should report this to the Chair of Trustees who may address the matter in accordance with the Trust's disciplinary procedure.

No action will be taken against an employee where concerns raised are subsequently unproven.

However disciplinary action may be taken against individuals who knowingly make false, malicious and/or vexatious allegations.

Should an employee commit a criminal offence in raising a concern (e.g. accepting a bribe or an act of corruption) protection from detriment may be lost, and the employee may be subject to the Trust's disciplinary procedures.

Confidentiality

The best way to raise a concern is to do so openly. Openness makes it easier for the Trust to assess and investigate the issue. However, it is recognised that there may be some circumstances where an employee would prefer to raise a concern in confidence. Employees should make the Trust aware of this when raising their concern.

Where appropriate every effort and consideration will be given to arrangements to maintain the employee's confidentiality, including off site meetings where appropriate.

Every effort will be made not to reveal the employee's identity, without their prior consent, if this is their wish.

However, in certain cases, it may not be possible to maintain confidentiality if the concern is subject to an external/police investigation where disclosure is required. An employee will be advised should there be a possibility that their confidentiality cannot be maintained.

Anonymous Concerns

Employees are encouraged to put their name to any allegation where possible.

Anonymous allegations will be considered and investigated at the Trust's discretion.

In exercising the discretion, the following factors may be considered:

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

It should be noted that it may be more difficult to address the concern, support an employee or advise them of the outcome where a concern is reported anonymously.

Support

Employees who raise a concern may wish to make use of the confidential counselling service provided by our Trust, if appropriate.

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Employees may also wish to consult their professional association or Trade Union if they are a member.

Other sources of support are provided in Appendix A.

Should an employee be required to give evidence in criminal or disciplinary proceedings, consideration will be given to appropriate support.

10 Other Concurrent Processes

Where a complaint is raised under the whistleblowing procedure this will not in itself be sufficient to halt any other ongoing processes relating to absence, conduct, performance, or redundancy.

However, each case will be considered on its merits to ensure that our trust is acting reasonably.

11 Record Keeping

Notes may be taken of all meetings with the employee held under this procedure. Where notes are taken a copy will be made available to the employee.

All records relating to the management of whistleblowing disclosures will be gathered, processed, held, and shared in accordance with the requirements of the General Data Protection Regulations and Data Protection Act (2018). In certain limited circumstances information may be shared by the Trust for the purpose of managing the disclosure.

Please refer to the Trust's Data Protection Policy and Privacy Notice for further details.

A central record of whistleblowing will be maintained by the Academy Committees and reported in full to the Board of Trustees. This record will include a summary of the concern raised, action taken, and the resulting outcome. Senior staff or Academy Committee members who receive whistleblowing concerns must ensure the concern is recorded.

12 Review of policy

This policy is reviewed annually by the Trust's Audit & Risk Commitee. We will monitor the application and outcomes of this policy to ensure it is working effectively.

13 Equal Opportunities Statement

Our Trust is committed to reviewing the complaints policy regularly to ensure that it takes account of the Equality Act 2010 and does not discriminate against any complainant, or concerned party, on the grounds of race, religion or belief, disability, age, pregnancy and maternity, gender reassignment, marriage and civil partnership, sex, or sexual orientation.

14 Responsibilities of the Academy

- To foster a culture where employees can feel confident in raising concerns
- To ensure concerns are fully considered, investigated as necessary, and action taken as appropriate
- To ensure that employees raising concerns receive feedback on any action taken where appropriate
- To make employees aware of how they can take matters further if they are not satisfied
- To reassure employees that they will be protected against detriment and reprisal should they raise a concern

15 Responsibilities of the Employee

- To raise concerns only where there is a reasonable suspicion for doing so
- Not to knowingly raise a false allegation with malicious or vexatious intent
- To engage with internal/external actions to address any concerns, by attending meetings and/or participating in any investigation

16 Trade Union Representation

Employees may wish to consult and seek guidance from their Trade Union representative before making a disclosure under this procedure.

Employees may be accompanied to any meeting by a trade union representative or workplace colleague (Solent Academies Trust employee) who is not involved in the area of work to which the concern relates.

17 Responsible Officer and Monitoring of Complaints

The Board of Trustees has overall responsibility for the maintenance and operation of this policy and procedure.

The Chief Executive Officer will ensure the effective implementation of the whistleblowing arrangements, providing training as appropriate, and undertake an annual audit of the whistleblowing arrangements, reporting the outcome to the Board of Trustees.

The Chief Executive Officer will consider:

- The number and types of concerns raised and the outcomes of the investigations.
- Feedback from individuals who have used the arrangements
- Any complaints of victimisation
- Any complaints of failures to maintain confidentiality
- Any relevant litigation
- The level of staff awareness, trust, and confidence in the arrangements

Any reporting will not identify the parties to the complaint.

The table below details all Whistleblowing routes:

Appendix A: Contact Details

It is the usual expectation that an employee will have endeavoured to raise the concern internally within the Trust before referring the matter to an external organisation.

Internal

Contact	*Telephone Number*	*Email*
Faye Watton-Lawrence	02392 852330	Faye.watton-lawrence@maryroseacademy.info
Nicola Payne	02392 662601	Nicola.payne@cliffdaleprimaryacademy.info
Louise Quaid	02392 631259	louise.quaid@solentacademiestrust.info
Sam Galloway	07864 676050	Sam.galloway@solentacademiestrust.info
Sharon Burt	07498 483138	Sharon.burt@solentacademiestrust.info

Or in writing to the above named at the following address:

Unit 4, Acorn Business Centre,
Northarbour Road
Portsmouth
PO6 3TH

Should you wish to contact the Chair of Academy Committee, Chair of Trustees, or Chair of Audit and Risk Committee, please email Governance Professional at

governance@solentacademiestrust.info

Contact	*Telephone Number*	*Email / Website*
Protect (formerly Public Concern at Work)	020 3117 2520	www.protect-advice.org.uk
Department for Education	0370 000 2288	www.gov.uk/ contact-dfe;
Ofsted	0300 123 3155	whistleblowing@ofsted.gov.uk;
Local Government Ombudsman	0300 061 0614	www.lgo.org.uk;
Office of Qualifications & Examinations Regulation	0300 303 3344	whistleblowing@ofqual.gov.uk
National Child Abuse Whistleblowing Advice Line	0800 028 0285	help@nspcc@org.uk;

A comprehensive listing of 'prescribed persons and bodies' to which external disclosures may be made is available at:

www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies;

Employees may also wish to raise a concern with:

- An elected member of the local authority
- Relevant trade union or professional association where the employee is a member
- A solicitor
- The police

Support for Employees

- Confidential Counselling Service - available via the HR Department
- Education Support Helpline at www.teachersupport.info or 08000 562561
- Trade union or professional association where the employee is a member
- Citizen's Advice Bureau at www.citizensadvice.org.uk

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