Whistleblowing Policy & Procedure

Bordesley MAT Central Policy
Approved by the Trust on 29/09/2026

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Approved by	Trustee Board
Review date	30/09/2027

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Bordesley Multi Academy Trust Mission Statement

We believe that success is achieved by working in partnership with parents, carers and the wider community. We are committed to working with our partners to ensure the very best outcomes for all our learners, from 3 to 19.

The significant guiding principles of the MAT are based around autonomy, trust, respect, equity and outstanding relationships. We believe that positive and constructive relationships are at the heart of every successful school. This allows the entire community to be valued and challenged to be their best, raising aspirations for all.

Policy Statement

This policy has been adapted from the Worcestershire County Council (WCC) Policy and Procedure, updated in April 2026/

Throughout this policy:

- The Trust refers to Bordesley Multi Academy Trust (BMAT) and its schools
- The School refers to any of the Trust's individual schools:
    - Holyoakes Field First School
    - Birchensale Middle School
    - Woodfield Academy
    - Trinity High School and Sixth Form Centre

Review and Approval
This policy will be reviewed annually by the Trust and, where necessary, amended to reflect changes in legislation, employment practice, and operational requirements. The next review date is September 2027.

1. Introduction

1.1 The trust and its schools are committed to the highest standards of openness, integrity and accountability. The aim of this policy is to encourage those who have serious concerns about any aspect of the schools work to come forward and voice those concerns. Any victimisation for using the procedure will not be tolerated.

1.2 Whistleblowing is the act of making a confidential disclosure in the public interest and occurs when a concern is raised (i.e. someone 'blows the whistle') about wrongdoing, risk, malpractice or illegality that affects others, for example members of the public. The disclosure may be about the alleged wrongful conduct of the employer, a colleague, client, or any third party. Typically, the whistleblower is not directly, personally affected by the danger or illegality, although they may be.

1.3 Personal complaints such as bullying or discrimination should be addressed through the Fairness & Dignity Policy or Grievance Policy (or other relevant procedure according to the circumstances), unless they contain information that meets the legal criteria for a protected disclosure.

2. Scope

2.1 This policy applies to all trust employees including teaching and non-teaching staff.

3. Equality and Diversity

3.1 Equality and diversity underpin all the trust's employment policies, procedures and practices. The trust actively promotes equality of opportunity and values diversity among its employees.

4. Principles

4.1 All trust employees will be made aware of the importance of preventing and eliminating wrongdoing at work. Employees should be watchful for and report any illegal or unethical conduct.

4.2 Trustees, Headteachers and Governing Bodies should:

- Ensure that any concerns raised are taken seriously.
- Investigate thoroughly and make an objective assessment of the concern.
- Keep the individual advised of progress.
- Ensure action is taken to resolve a concern.

4.3 Any employee should feel they are able to raise an allegation in good faith and without recourse or being victimised. This means that the continued employment and opportunities for future career progression or training of the employee will not be prejudiced because they have raised a legitimate concern.

4.4 Any trust employee later found to be maliciously making a false allegation will be referred for action under the Disciplinary Policy as this will be considered a disciplinary matter. If the individual is a contractor, supplier or is employed by another organisation, but working on behalf of the school and they make an allegation maliciously or for personal gain, this may result in them being removed from the approved list of contractors or the trust may discontinue using their services.

4.5 An attempt or instruction to cover up wrongdoing is itself a conduct matter. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees should not agree to remain silent. They should report the matter in accordance with this policy.

4.6 This procedure is not designed to be a substitute for the trust's Fairness & Dignity Policy. If an employee has a concern unrelated to malpractice, they should use the Grievance or Fairness & Dignity procedures.

4.7 If misconduct is discovered as part of any investigation under this procedure, the trust's Managing Unsatisfactory Performance/Capability and Disciplinary policies may be invoked (in addition to any appropriate external measures).

4.8 Concerns that relate to an individual's contract should be dealt with under the trust's Grievance or Fairness & Dignity policy, unless they also meet the test for a protected disclosure/s.

4.9 The Trust will specify alternative means for an individual to register concerns with the organisation where they do not wish to approach their Line Manager/Headteacher.

4.10 If the concern relates to a safeguarding issue you should inform the Headteacher or Chair of Governors, if the Headteacher is involved. They should then immediately contact the Local Authority Designated Officer (LADO).

4.11 Concerns expressed anonymously, may be considered under this whistleblowing procedure, especially those relating to the welfare of children. The school, 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.

5. Qualifying Disclosures

5.1 A qualifying disclosure is one where the worker reasonably believes that it shows:

- A criminal offence.
- The breach of a legal obligation.
- A miscarriage of justice.
- Risk to health and safety.
- Environmental damage.

- Sexual harassment.
- Concealment or attempt to conceal any of the above.

5.2 The disclosure must also be made with a reasonable belief that it is in the public interest.

6. Protection

6.1 The Public Interest Disclosure Act 1998 (PIDA) is the law that protects whistleblowers from negative treatment at work or dismissal for raising their concerns by making a 'qualifying disclosure'. Protection under PIDA does not extend to disclosures made by employees of external organisations, volunteers, job applicants, members of the public or elected members.

6.2 A disclosure is not protected unless the whistleblower reasonably believes that the disclosure is made in the public interest.

6.3 Protection is given to a 'protected disclosure' which is a 'qualifying disclosure' given to particular persons as defined by the legislation, for example the school as employer.

6.4 Employees can make a disclosure to a non-prescribed person, and still retain protection under the Employment Rights Act 1996, if certain conditions are met, namely:

- The employee reasonably believes the information is substantially true, the employee is not making the disclosure for personal gain, and, in all the circumstances, it is reasonable for the employee to make the disclosure.
- The employee must also reasonably believe that they would be subject to a detriment by the employer if they made the disclosure directly to the employer or a prescribed person and/or reasonably believe that the employer would conceal or destroy evidence if the disclosure were put directly; or have previously made the same disclosure to the employer or a prescribed person to no avail.

6.5 Victimisation of whistleblowers will be considered a conduct matter by the trust, and dealt with under the Disciplinary Policy.

7. Raising a Concern

7.1 Concerns may be raised verbally or in writing (preferably in writing to the Headteacher) as soon as possible, and should include:

- The nature of the concern.
- Why they believe it to be true.
- Relevant background information and dates.

7.2 Although the employee is not expected to prove beyond doubt the truth of their suspicion, they will need to demonstrate that they have a genuine concern relating to suspected wrongdoing or malpractice within the school and there are reasonable grounds for the concern.

7.3 If personally involved in the matter, the employee should make this clear from the outset.

7.4 The employee has no responsibility for investigating the matter. It is the school's responsibility to ensure that appropriate investigation takes place. It is expected that the investigating officer will either be the Headteacher or the Chair of Governors, however they do have the discretion to delegate the investigation to another person if they feel this is appropriate.

7.5 As a first step, raise the issue with the Headteacher, or in the absence of the Headteacher, the person responsible for the school at that time.

7.6 If the employee believes that the Headteacher is involved in the matter of concern, or feels unable to raise it with the Headteacher, they should contact the **Chair of Governors** of the school.

7.7 If the employee feels unable to raise the matter with the Headteacher or the Chair of Governors, if either of them is involved in the matter, or if the concern is one that goes beyond a single school, they should raise it with any one of the following officers of the Trust:

- the **Chief Financial Officer**;
- the **Chief Operating Officer**;
- the **Trust Lead for People and Workforce**, who is also the Company Secretary.

The officer who receives the concern will determine, under section 8, whether an investigation is required and who should conduct it. They will record the concern and will escalate it to the Chief Executive Officer where the nature or seriousness of the matter requires it.

7.8 If the employee believes that one of the officers named above is involved in the matter, or feels unable to raise it with any of them, they should contact the **Chief Executive Officer**.

7.9 If the employee believes that the Chief Executive Officer is involved in the matter, or has raised a concern and considers that it has not been properly handled, they should contact the **Chair of Trustees**.

7.10 If the concern is about the Chair of Trustees, or about the Board as a whole, it should be raised with the **Members of the Trust**, through the Company Secretary.

7.11 Employees may also wish to seek advice and support from their trade union or professional association. Agency workers and those on work experience placements should contact the Trust's human resources team in the first instance.

7.12 Safeguarding Concerns

7.13 Any concerns about the abuse or neglect of any child, young person or adult with care and support needs, should be reported immediately via the relevant safeguarding procedures. Information and contact details can be found on the Worcestershire County Council website:

Adults:

https://www.worcestershire.gov.uk/council-services/adult-social-care/safeguarding-and-concerns-about-adult/report-safeguarding-concern-about-adult

Children:
https://www.worcestershire.gov.uk/council-services/childrens-social-care/refer-childrens-social-care

8. How will the school respond?

8.1 The school will assess disclosures promptly. To be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries may be made to determine whether an investigation is required and, if so, what form it should take and who will carry out the investigation. It is expected that in most cases, this will done by the Headteacher or Chair of Governors.

8.2 The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases, however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

8.3 It may be appropriate for the investigating officer to initially consider other procedures such as the Allegations of Abuse against Teachers and other Staff (in cases of safeguarding) and immediately contact the Local Authority Designated Officer (LADO).

8.4 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 and harassment or other relevant procedure.

8.5 During the investigation process the investigating officer may consider it appropriate to refer matters to:

- the **Chief Financial Officer**, where there are concerns about financial loss or irregularity. Where the concern relates to fraud, theft, bribery or other financial irregularity, the **Accounting Officer** must also notify the **Department for Education**, in line with the Academies Trust Handbook;
- the Trust's **internal audit function**, where independent scrutiny of a financial, control or assurance concern is required, and the **Chair of the Finance and Audit Standing Committee**, where the concern engages the Board's assurance role;
- the **Police**, where there are concerns of a criminal nature;
- the **Local Authority Designated Officer (LADO)**, where the concern relates to the conduct of an adult working with children;
- the **Chief Operating Officer**, where the concern relates to health and safety, premises, estates or operational compliance, and the **Health and Safety Executive** where a reporting duty arises;
- the **Company Secretary**, on matters of governance propriety, conflicts of interest, or compliance with the Trust's Scheme of Delegation;
- the **Trust's appointed solicitors**, where legal advice is required;

- the **Trust Lead for School Improvement and Standards**, where the concern relates to education, standards or inclusion;
- the **Trust Lead for People and Workforce**, and through them the Trust's appointed human resources advisor, where the concern engages employment matters;
- the **Disclosure and Barring Service** or the **Teaching Regulation Agency**, where a referral duty may arise;
- the **Information Commissioner's Office**, where the concern relates to a personal data breach.

Where a referral is made under this paragraph, the investigating officer will record the referral, the date and the reason, and will report it to the Chief Executive Officer, unless the concern relates to the Chief Executive Officer, in which case it is reported to the Chair of Trustees.

8.6 Within ten working days of a concern being raised, the person investigating a concern will write to the whistleblower:

- Acknowledging that the concern has been received.
- Indicating how they propose to deal with the matter.
- Supplying information on staff support mechanisms available.
- Confirming whether further investigations will take place and if not, why not.
- The amount of contact between with the whistleblower and the officers considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information. It is likely that the whistleblower will be interviewed to ensure that their disclosure is fully understood.
- Any meeting can be arranged away from the workplace, if wished, and a union representative or a colleague may accompany the whistleblower.

8.7 Confidentiality will be protected wherever possible; identity will only be disclosed if it is legally or otherwise necessary (e.g., court, disciplinary hearing). The whistleblower will be kept informed.

8.8 The investigation process would 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.

8.9 The investigating officer will write up their findings and recommendations and present them, in the form of a report, to the Headteacher and the Chair of Governors if the Headteacher of Chair of Governors has not completed the investigation so that they can determine what further action (if any) is required.

8.10 It may be necessary to refer the matter to other nominated governors to agree actions if the Headteacher and the Chair of Governors are already involved in the issue(s) or investigation.

8.11 The investigating officer will determine that either:

- there is no evidence to support the matters raised and no further action is required, **or**
- allegations have been proven and that it is appropriate to take action in accordance with the disciplinary procedure or other relevant action, **or**

- 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 (Teachers Regulation Agency), **or**
- the allegation is found to be malicious and will be investigated as a conduct issue under the disciplinary procedure.

8.12 The school will do what it can to minimise any difficulties that the employee may experience as a result of raising a concern. For instance, where asked to give evidence in criminal or disciplinary proceedings, the school will arrange for the employee to receive appropriate advice and support.

8.13 Unless there are any legal reasons preventing the school from doing so, the employee will be kept informed of the progress and outcome of any investigation.

9. Raising a Concern Externally

9.1 Whilst we hope that this Policy gives employees confidence to raise a whistleblowing concern internally, the school would prefer that concerns are raised with the proper external regulator rather than not at all.

9.2 If an employee feels unable to raise concerns internally, they may report to a prescribed person, as set out on the GOV.UK website: https://www.gov.uk/whistleblowing.

Employees are strongly advised to seek independent advice before raising issues externally.

10. Further Advice

10.1 This policy is intended to give employees of the Trust a route to raise concerns internally, and it is hoped that this will be the first option in every case.

10.2 If an employee feels unable to discuss the matter with their Headteacher or the Chair of Governors, they may raise it with the Chief Financial Officer, the Chief Operating Officer, or the Trust Lead for People and Workforce, as set out above. If the employee feels unable to raise it with any of those officers, or considers that a concern has not been sufficiently investigated, they may raise it with the **Chief Executive Officer** and thereafter with the **Chair of Trustees**.

10.3 Where the concern is about the **Chief Executive Officer**, it should be raised with the **Chair of Trustees**. Where the concern is about the **Chair of Trustees**, or about the Board as a whole, it should be raised with the **Members of the Trust**, through the Company Secretary. Where the concern is about the **Company Secretary**, it should be raised with the Chair of Trustees directly.

10.4 Trust officers can be contacted through the Trust's central office on **01527 586970** or by email to **admin@bmat.co.uk**.

10.5 The Trust's appointed human resources advisor is **Worcestershire County Council HR**. If, having read this policy, an employee is uncertain whether it is the appropriate policy or how to proceed, they may seek informal advice from **The Schools HR Consultancy on 01905 844560 or at SchoolsHRconsultancy@worcestershire.gov.uk**. This is an advisory service to the Trust. Worcestershire County Council has no role in deciding, determining or investigating a whistleblowing concern raised within the Trust, and contacting the Trust's human resources advisor is not a substitute for raising the concern under this policy.

10.6 If an employee wants independent advice at any time, they may contact **Protect**, a charity providing free and confidential advice to people who are unsure whether or how to raise a public interest concern. Protect can be contacted on **020 7404 6609** or at **www.protect-advice.org.uk**.

11. Related Documents

- WCF Whistleblowing Policy and Procedures

12. Document Version Control

Version	Date	Description of changes and person/organisation responsible
Draft v23.1	16/10/2023	Based on WCF Sept 23 model policy
Approved v23.1	24/10/2023	Approved by Full Trustees
Draft v25.1	18/01/2025	No proposed changes. Review cycle moving to annual cycle.
Approved v25.1	11/02/2025	Approved by Trustees
Draft v25.2	21/09/2025	No proposed changes. Review cycle moving to annual cycle in September.
Approved v25.2	30/09/2025	Approved by Trustees
Review v26.1	01/07/2026	Based on WCC April 26 model policy
Approved v26.2	14/07/2026	Approved by Full Trustees
Draft v26.3	23/09/2026	Trust escalation routes replacing WCC maintained school routes; sections 7, 8.5 and 10 rewritten.
Approved v26.3	29/09/2026	Approved by Trustees