Whistle Blowing Policy

Version 5.0

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Leverhulme Academy Trust

Leverhulme Academy Trust Document Control Table			
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Document History		
Previous Version	**Date**	**Notes on Revisions**
4.1	**March 26**	New clause (3.1.6) confirming sexual harassment disclosures as an example of a protected disclosure Additional wording (3.2) to confirm that the Trust will seek to agree which policy to manage allegations under Additional wording (3.3) to reflect that preventing sexual harassment policy may be more appropriate policy in some circumstances Addition of Lostock Primary School Head of School and Executive Headteacher contact details in contacts table Addition of EHRC contact details in contacts table to ensure contact details reflect cases of sexual harassment Trust Whistle Blowing Champion appointed – Steve McClean
4.0	**March 24**	Amended to provide additional opportunities for reporting concerns and updated processes and contact points. Additional opportunity for counselling support for whistle blower. Trust Whistle Blowing Champion appointed – Paul Hannat
3.1	**November 2021**	Reviewed – no changes. Format updated to Trust brand / templates
3.0	**November 2019**	Updated to reflect the new position of Head of School Clarification that whilst a written response will be provided to the whistle blower certain details may need to be restricted due to confidentiality. Beyond the immediate actions, the headteacher / head of school, trustees and other staff if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing. Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way. Considered by Risk and Audit committee
2.0	**July 2017**	Trust Whistle Blowing Champion appointed – Anne Quigley.
1.0	**June 2017**	Replaced LA model policy to appropriately reflect Academy governance model.

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1 Introduction

1.1 Leverhulme Academy Trust is committed to the highest possible standards of honesty and integrity, and we expect all staff to maintain these standards in accordance with our values and our Code of Conduct. 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.

1.2 This policy has been implemented following consultation with the recognised trade unions. It has been formally adopted by the Trust Board and was last reviewed in September 2026.

1.3 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 and purpose

2.1 The aims of this policy are:

2.1.1 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.

2.1.2 To provide staff with guidance on how to raise concerns.

2.1.3 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, members, trustees, 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:

3.1.1 criminal activity;

3.1.2 miscarriages of justice;

3.1.3 danger to health and safety;

3.1.4 damage to the environment;

3.1.5 failure to comply with any legal or professional obligation or regulatory requirements;

3.1.6 a disclosure that sexual harassment has occurred, is occurring or is likely to occur;

3.1.7 bribery;

3.1.8 financial fraud or mismanagement;

3.1.9 negligence;

3.1.10 breach of our internal policies and procedures, including our Code of Conduct;

3.1.11 conduct likely to damage our reputation or financial wellbeing;

3.1.12 unauthorised disclosure of confidential information;

3.1.13 unethical behaviour; and (actions that are against social norms or acts that are considered unacceptable to the public)

3.1.14 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, or Preventing Sexual Harassment at Work Policy, as appropriate.

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 relevant School/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 the School/Trust's leadership team.

3.6 If your concern is in relation to safeguarding and the welfare of students at the school, you should consider whether the matter is better raised under the school's safeguarding and 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.

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:

4.2.1 Carol Davies, CFO. This is the member of the executive team who is responsible for managing whistleblowing.

4.2.2 OR The relevant Head Teacher / Head of School / Executive Headteacher

4.2.3 OR The relevant Chair of Governors

4.2.4 OR Mr P Hannant (Trustee)

4.3 Contact details are set out at the end of this policy

4.4 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

4.5 We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

5 Confidentiality and data protection

5.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

5.2 We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the other contact points listed in paragraph 4.2 and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are given at the end of this policy.

5.3 Where we receive anonymous complaints, we will investigate the complaints as far as is reasonable taking into account:

5.3.1 the seriousness of the issue raised

5.3.2 the credibility of the concern; and

5.3.3 the likelihood of confirming the allegation from other sources

5.4 As part of the application of this policy, the School/Trust may collect, process and store personal data in accordance with our data protection policy. We will comply with the requirements of Data Protection Legislation (being the UK General Data Protection Regulation and Data Protection Act 2018) and any implementing laws, regulations and secondary legislation, as amended or updated from time to time in the collecting, holding and sharing of information in relation to our workforce. Records will be kept in accordance with our Workforce Privacy Notice, our Records Retention and Destruction Policy and in line with the requirements of Data Protection Legislation.

6 External disclosures

6.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

6.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. Protect holds a list of prescribed regulators for reporting certain types of concern. Their

contact details are at the end of this policy. Alternatively, the list is available from the Department for Business, Energy & Industrial Strategy[1].

6.3 Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a contractor, supplier or service provider. In some circumstances the law will protect you if you raise a concern with the third party directly where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the other individuals set out in paragraph 4.2 for guidance.

7 Investigation and outcome

7.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. This assessment will, include consideration if the concern would be more appropriately considered and should be heard under an alternative policy, for example, the grievance policy, or disciplinary and dismissal policy This initial assessment will be completed by the relevant Headteacher / Head of School / and CFO and or Whistleblowing champion. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

7.2 In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. We may in some circumstances, appoint an external person or body to investigate the concern. The investigator(s) will collate findings on the matter and may make recommendations for change to enable us to minimise the risk of future wrongdoing. This will be sent to the Head Teacher/Head of School and/or Governing Body/Trust Board for action.

7.3 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation, an outcome or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

7.4 If we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

8 If you are not satisfied

8.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

8.2 If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in paragraph 4.2. Alternatively, you may contact the Chair of Governors or Chair of Trustees or our external auditors. Contact details are set out at the end of this policy.

[1] https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2

9 Protection and support for whistleblowers

9.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

9.2 Staff must not suffer any detrimental treatment as a result of raising a genuine concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform one of the contact people in paragraph 4.2 immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

9.3 Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action. In some cases, the whistleblower could have a right to sue an individual personally for compensation in an employment tribunal.

Confidential support and counselling is available to whistleblowers who raise concerns under this policy. This can be arranged through our occupational health provider, Smart Clinic. Alternatively you could also contact the Education Support Partnership[2]. Whistleblowers will be advised of the contact details for this support when they contact one of the contact people in paragraph 4.2.

10 Review of policy

This policy is reviewed two years by the Trust in consultation with recognised trade unions. We will monitor the application and outcomes of this policy to ensure it is working effectively.

11 Contacts

Whistleblowing Officer	C Davies (CFO) 01204 333266 ext 7516 cdavies@lcect.co.uk
Whistleblowing Champion	Steve McClean (Trustee) c/o Rivington and Blackrod High School Rivington Lane Rivington Bolton BL6 7RU
Head Teacher/Head of School/Executive Headteacher	S Heppenstall 01204 572941

[2] https://www.educationsupportpartnership.org.uk/helping-you/telephone-support-counselling

Harper Green School Rivington and Blackrod High School Lostock Primary School	head@harpergreen.net P Roach 01204 333266 head@rbhs.co.uk H Barnes-Gray (Head of School) Barnes-GrayH@Lostock.bolton.sch.uk 01204 333733 V Guest (Executive Headteacher) GuestV@Lostock.bolton.sch.uk 01204 333733
Chair of Governors	Address your enquiry to Chair of Governors C/O EITHER Harper Green School, Rivington and Blackrod High School or Lostock Primary School
Trust's external auditors	UHY Hacker Young Manchester LLP 0161 2366936 Website: www.uhy-uk.com
Protect (Independent whistleblowing charity)	Helpline: (020) 3117 2520 Website: www.protect-advice.org.uk
The NSPCC whistleblowing helpline	Helpline: 0800 028 0285 E-mail: help@nspcc.org.uk
Department for Education	Telephone: 0370 000 2288 Website: www.gov.uk/government/organisations/department-for-education
Ofqual	Telephone: 0300 303 3344 Website: www.gov.uk/government/organisations/ofqual

Equality & Human Rights Commission (EHRC) / Equality Advisory Support Service (**EASS**)	Telephone – 0808 800 0082 http://www.equalityadvisoryservice.com/app/ask Website: Equality Advisory Support Service (EASS) - GOV.UK