

# Whistleblowing Policy – April 2026

---

## Introduction

Our Whistleblowing Policy applies to all academies and places of work within Spencer Academies Trust. Our members, directors and employees of our Trust seek to undertake all aspects of Trust business and professional delivery with full regard to high standards of conduct, honesty and integrity. The reporting of suspected wrongdoing or cause for concern is encouraged as part of ensuring that our Trust meets this standard. A copy of this policy can be found in [SharePoint ASK HR](#) or your document library in Every Compliance.

We are committed to promoting equality, diversity and inclusion in both employment and education provision within Spencer Academies Trust and to creating an environment free from discrimination, bullying, harassment, sexual harassment, or victimisation. We aim to ensure all employees, within our One Spencer community feel they are treated fairly and with dignity and respect. Where our individual differences and the contributions we make are all recognised and valued regardless of age, gender reassignment, being married or in a civil partnership, being pregnant or on maternity leave, disability, race including colour, nationality, ethnic or national origin, religion or belief, sex, and sexual orientation.

Every person in our One Spencer community has a responsibility for making our Trust an inclusive environment where all members of our community feel welcome and can be themselves.

Our Whistleblowing procedure acts as a framework to allow concerns to be raised confidentially and provides for thorough and appropriate investigation as a necessary step toward resolution and continuous improvement of working practices. At Spencer Academies Trust we are committed to creating a climate of trust and openness so that a person who has a genuine concern or suspicion can raise the matter with the full confidence that the matter will be appropriately considered either within their working environment or by recourse to an external party, for example the police. Our Whistleblowing Policy does not form part of any employee's contract of employment, and it may be amended at any time.

The responsibility to consider employees' whistleblowing concerns has been delegated to the Principal or Central Team Director in collaboration with the Chief Executive or Board Member. Throughout this Policy, 'Principal or Central Team Director or Board Member' refers to the person outlined in the table of delegated authority as set out in our Scheme of Delegation in force at the date of adoption of this Policy. The Principal or Central Team Director or Board Member or their appointed representative will be responsible for managing the procedures and will appoint an appropriate manager to investigate the concerns raised under this Policy.

Complaints concerning the CEO, Central Executive Team, Executive Principal/Leader, Principal or members of the Central Team will be managed in the case of the Central Executive Team, Executive Principal/Leader, Principal, or members of the Central Team by the CEO or their appointed representative and in the case of the CEO by the Chair of the Trust Board of Directors or their appointed representative. In such cases, contact must be made with the Director of HR who will manage the process and appoint an appropriate leader to investigate the concerns raised under this Policy unless the concern is about the Director of HR this will be managed by the CEO. Concerns relating to school-based colleagues will be managed by the Principal or their appointed representative.

Investigating officers may be drawn from Trust leaders from across our academies, central team leaders and Board of Directors depending on the nature and complexity of the investigation. All investigating officers and decision makers acting within SAT policies and procedures have received appropriate CPD and training to undertake their role effectively.

Guidance on managing these procedures is available from the Trust Central HR Team who must be consulted before commencing these procedures.

## Who is covered by the Whistleblowing Policy

The Whistleblowing Policy applies to all individuals working at all levels of the Trust or trust academies, including but not limited to trustees, members of local governing bodies, senior managers, teachers, education support professionals, consultants, contractors, part-time and fixed-term employees, casual and agency staff and volunteers. Parents or members of the broader trust community may also raise concerns under the Whistleblowing Policy.

The Trust will consider concerns raised under this Policy from anyone within the wider Trust community. However, statutory whistleblowing protection under the Public Interest Disclosure Act 1998 and the Employment Rights Act 1996 applies to “workers” as defined by law.

### Protected Disclosures

The Public Interest Disclosure Act 1998 (PIDA) provides legal protection for workers who make certain disclosures of information in the public interest. PIDA is implemented through Part IVA of the Employment Rights Act 1996 (as amended). In broad terms, a disclosure may be protected where the individual reasonably believes the information tends to show one of the relevant types of wrongdoing (for example a criminal offence, breach of a legal obligation, miscarriage of justice, health and safety danger, environmental damage, or concealment of any of these), and the disclosure is made through an appropriate route. Where a disclosure is protected, the individual must not suffer detriment or dismissal because they raised the concern.

The Trust encourages employees to raise concerns about harassment, discrimination, or other wrongdoing. Concerns about bullying, harassment or discrimination that relate primarily to an individual’s own treatment should normally be raised using the appropriate SAT grievance or anti-harassment procedure. However, where the information disclosed is reasonably believed to be in the public interest and tends to show wrongdoing (for example, a wider or systemic failure to prevent harassment, discrimination or victimisation), the concern may also be raised under this Whistleblowing Policy and may amount to a protected disclosure.

From 6<sup>th</sup> April 2026 an employee who raises a concern or makes a disclosure honestly and with a reasonable belief that the information disclosed is in the public interest and tends to show wrongdoing, including concerns relating to harassment or sexual harassment, will be protected under the whistleblowing provisions of the Employment Rights Act 1996 (as amended).

No employee will be subjected to any detriment or dismissed for making a protected disclosure, and any retaliation against an individual for raising such concerns will be treated as a serious matter and may result in disciplinary action.

## What is Whistleblowing

Whistleblowing is the reporting of suspected wrongdoing, malpractice or dangers at work in relation to the Trust, central team or its member Academies activities concerning matters of public interest. This may include fraud, corruption or other criminal activity, miscarriages of justice, danger to health and safety risks, damage to the environment and any breach of legal or professional obligations or internal policies and procedures, bribery, manipulation of accounting records and finances, inappropriate use of academy assets or funds, decision making for personal gain, abuse of position, malpractice, or serious breaches of Trust processes which may advantage a particular party, for example tampering with tender documentation or failure to register a personal interest, conduct likely to damage reputation or financial wellbeing, unauthorised disclosure of confidential information or negligence. A Whistle-blower is a person who raises a genuine concern relating to any of the above.

Below sets out the ACAS guidance (*illustrative examples only*) on qualifying disclosures

*Examples of the types of issue that can amount to a qualifying disclosure include:*

- *a criminal offence – for example, suspected fraud, theft, bribery, or misuse of public funds*
- *a breach of a legal obligation – for example, failure to follow statutory duties, funding agreement requirements, or procurement rules*
- *a danger to health and safety – for example, unsafe premises, serious neglect of risk assessments, or unsafe staffing arrangements*
- *safeguarding-related organisational failings – for example, systemic failures to follow safeguarding procedures or to act on known risks*
- *damage to the environment – for example, unsafe disposal of hazardous materials*
- *deliberate concealment of information about any of the above*

*You can also whistleblow about someone trying to cover up information about any of these issues.*

*You can make a qualifying disclosure about an issue that's happened at any time. This includes if it's likely to happen in the future. It can also be about something that takes place overseas.*

*You can report one or more qualifying disclosures.*

The Whistleblowing Policy is intended for concerns about suspected wrongdoing, malpractice or dangers at work that are in the public interest. It is not normally the appropriate route for personal employment matters or complaints about an individual's own treatment, which should usually be raised under the relevant grievance, anti-harassment, sexual harassment, bullying and discrimination policies or the Trust complaints policy. However, a concern can fall under more than one policy: if the issue you are raising involves information you reasonably believe is in the public interest and tends to show wrongdoing (for example, a wider or systemic problem), you may raise it under this Whistleblowing Policy even if it also relates to harassment, discrimination or a grievance. In such cases, the Trust will decide the most appropriate process (or processes) to follow.

### Which policy should I use?

- Use this Whistleblowing Policy if you are reporting suspected wrongdoing or risks that you reasonably believe are in the public interest (for example, a wider or systemic issue affecting pupils, staff, the Trust, public funds, compliance, health and safety or the environment).
- Use the Grievance Policy if your concern relates mainly to your own employment situation or treatment (for example, pay, workload, management decisions), unless it also involves public-interest wrongdoing.
- Use the anti-harassment, sexual harassment, discrimination and bullying procedures to report bullying, harassment, sexual harassment or discrimination about your own experience. If you reasonably believe the issue also indicates a wider or systemic failure, you can raise it under this Whistleblowing Policy as well.
- Use safeguarding procedures immediately if a concern relates to the safety or welfare of a child (and you can also raise related organisational failings under this Whistleblowing Policy).

### Raising a concern

Concerns should initially be raised with your Principal/line manager, Director of HR, CEO or Chair of the Directors of the Trust as appropriate. Contact details for this can be found on the Trust and Academy websites or by contacting [info@spencertrust.org.uk](mailto:info@spencertrust.org.uk) or [complaints@spencertrust.org.uk](mailto:complaints@spencertrust.org.uk)

The Whistle-blower should raise the matter in person, by telephone, or in written form marked 'private and confidential' and addressed to one of the above. Details of the matter raised should specify the nature of the concern, why it is believed to be true and include the background, history and relevant dates and times where possible. Any witnesses and documentary evidence should also be supplied.

### How are concerns progressed

Once a concern has been raised, we will carry out an initial assessment to determine the scope of any investigation. We will inform the whistle-blower of the outcome of our assessment. The whistle-blower may be required to attend an initial meeting and any further meetings to provide further information.

In some cases, depending on the nature of the matter raised, we may appoint an investigating officer or officers who will carry out an investigation supported by the Trust HR Team and Head of Governance as appropriate.

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

Investigations under the Whistleblowing Policy will be conducted in line with our Grievance Policy. A copy of the Grievance Policy can be found in [SharePoint ASK HR](#) or in Every Compliance Document Library.

Investigations will seek to establish the facts of the matter and assess the scope of the investigation and whether there is a need to involve third parties to provide further information, advice, or assistance. Reports of any safeguarding concerns will be managed in line with the local authority safeguarding procedures and may be appropriately disclosed to external authorities.

Where appropriate, a meeting will be offered, as soon as possible, to discuss concerns. The Whistle-blower may be accompanied by a companion who may be a work colleague or trade union representative. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

Notes of all meetings held under this Policy will be taken and a copy sent to the employee for acceptance as a true record of the meeting. Where there is a dispute the employee may record, in red, their amendments. The original notes plus the amended version will be kept as a record.

The timeframe for the investigation will be shared with all parties, including where there are likely to be delays due to the complexities of the investigation and/ or due to academy closure periods.

Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer or officers will consider how best to report the findings and what if any corrective action needs to be taken. Where appropriate, this may be in conjunction with the Board of Directors, CEO, Principal or Central Team Directors, and may include some form of disciplinary action or third-party referral including but not limited to internal or external audit or police investigation.

The Whistle-blower will be informed of the results of the investigation and whether the concern has been substantiated. Where appropriate they will be informed of the action taken to remediate the concern. The matter will be notified to the Board of Directors and to the Local Governance Committee where appropriate.

## **If you are not satisfied**

If the Whistle-blower is dissatisfied with the conduct of the investigation or resolution of the matter or has genuine concerns that the matter has not been handled appropriately, the concerns should be raised with the investigating officer or officers, the Board of Directors, CEO, Principal, Director of HR, or Head of Governance as appropriate.

## **Malicious or vexatious allegations**

Colleagues are encouraged to raise concerns when they believe there to potentially be an issue. If a concern is raised honestly and with a reasonable belief, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern. If we conclude that a whistleblower has made false allegations maliciously, or with a view to personal gain, the whistleblower may be subject to disciplinary action

## **Respecting confidentiality**

Spencer Academies Trust will seek to respect the confidentiality and anonymity of the whistle-blower wherever this may be possible. If an employee requests to raise their concern confidentially, this will be respected to the extent that a proper investigation and resolution is not prevented. We will only disclose the whistle-blower's identity where it is necessary and proportionate to do so (for example, to the investigating officer(s) and/or others involved in the investigation on a strict need-to-know basis). In some circumstances, disclosure may also be required to comply with safeguarding duties, legal obligations, regulatory requirements, or to ensure a fair and effective investigation. Where possible, we will discuss any proposed disclosure with the whistle-blower in advance.

We do not encourage anonymous disclosures. Proper investigation may be more difficult or impossible if we cannot obtain further information from the Whistle-blower. It is also more difficult to establish whether any allegations are credible. Whistle-blowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the contact points listed above and appropriate measures can then be taken to preserve confidentiality. Advice may be sought from our confidential counselling hotline, through Health Assured [ASK HR](#) or Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this Policy.

## External disclosures

The purpose of the Whistleblowing Policy is to provide an appropriate internal mechanism for the reporting, investigating and resolution of any wrongdoing in the workplace. In most cases individuals should not find it necessary to additionally alert external authorities: however, we recognise that in some circumstances it may be appropriate to report concerns to an external body such as a regulator. Protect (an independent Whistleblowing charity) operates a confidential helpline for this purpose.

If you are considering reporting a concern externally, you should consider whether the organisation is a “prescribed person” for the type of issue you are reporting (the list of prescribed persons is published on GOV.UK). If you are unsure, seek advice before making an external disclosure.

Contact details for the confidential helpline are:

- t: 0203 117 2520
- e: [protect.tfaforms.net](mailto:protect.tfaforms.net)
- w: [protect-advice.org.uk](http://protect-advice.org.uk)

## Protection and support for Whistle-blowers

The purpose of the Whistleblowing Policy is to encourage resolution of concerns as part of a transparent and healthy working culture. Whether concerns are upheld or are found on consideration not to be substantive, any attempt to cause detriment to the Whistle-blower or to prevent concerns being raised will not be tolerated. If an employee believes they have suffered any such treatment as the result of raising a whistleblowing concern, they should inform the Principal or other appropriate contact as detailed above immediately.

We aim to encourage openness and will support employees who raise genuine concerns under this Policy, even if they turn out to be mistaken. This includes concerns raised honestly and with a reasonable belief that the information disclosed is in the public interest and tends to show wrongdoing, even if the concern is not ultimately substantiated. If following this process, the employee feels the matter has not been remedied they may raise it formally using our SAT Grievance Policy.

If the investigation concludes that a Whistle-blower has made false allegations maliciously or with a view to personal gain, the Whistle-blower may be subject to a disciplinary investigation or corrective action under the trust Disciplinary Policy.

## Safeguarding

All our employees and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in our Trust central team or its member academies safeguarding procedures and know that such concerns will be taken seriously by the senior leadership team. Whistleblowing procedures are in place for such concerns to be raised with us.

Where a colleague feels unable to raise an issue or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- general guidance on whistleblowing can be found via: Advice on Whistleblowing
- the NSPCC’s what you can do to report abuse dedicated helpline is available as an alternative route for colleagues who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 –line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk). Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House,42 Curtain Road, London EC2A3NH.

<b>Approved by:</b>	Director of HR	<b>Date:</b> 1 <sup>st</sup> April 2026
<b>Last reviewed on:</b>	1 <sup>st</sup> April 2026	
<b>Next review due by:</b>	1 <sup>st</sup> April 2028	

### VERSION HISTORY

Version	Approved By	Revision Date	Description of Change	Author
01/04/21	Director of HR	01/09/22	<ul style="list-style-type: none"> <li>▪ Commitment to EDI</li> <li>▪ Safeguarding added inline with KCSIE 2022</li> </ul>	SAT HR Team
01/09/22	Director of HR	01/04/24	<p>Clarity added to ensure all employees understand who to raise their concerns with when these relate to the Central team or the Principal.</p> <p>Investigating officers maybe drawn from Trust leaders from across our academies, central team leaders and Board of Directors depending on the nature and complexity of the investigation. All investigating officers and decision makers acting within SAT policies and procedures have received appropriate CPD and training to undertake their role effectively.</p>	SAT HR Team
01/04/24 V2	Director of HR	01/01/25	Apart from the changes to wording to reflect our One Spencer values and expectations and reiterated our commitment to EDI the	SAT HR Team

			policy has been updated to better reflect support for all colleagues across our Trust. Links added to SharePoint ASK HR	
01/01/25	Director of HR	01/04/26	<ul style="list-style-type: none"> <li>•Scope/coverage clarified: Added wording confirming the Trust will consider concerns from the wider community, but statutory whistleblowing protection applies to “workers” as defined in law.</li> <li>•Legal framework added/expanded: New “Protected Disclosures” section explaining PIDA 1998 and Employment Rights Act 1996 protections and what qualifies as protected wrongdoing.</li> <li>•Harassment/grievance overlap clarified: Added guidance distinguishing when to use whistleblowing vs grievance/anti-harassment/safeguarding, including examples of when harassment/discrimination can still be raised as whistleblowing if it’s a wider public-interest issue.</li> <li>•New decision aid: Inserted “Which policy should I use?” with bullet-pointed routing guidance (whistleblowing, grievance, anti-harassment/bullying &amp; discrimination, safeguarding).</li> <li>•Process strengthened: Added initial assessment step, meeting expectations, investigation approach, confidentiality expectations during investigation, and explicit reference that investigations will be conducted in line with the Grievance Policy; strengthened wording on meeting notes/record handling.</li> <li>•Confidentiality strengthened: Replaced prior confidentiality paragraph with clearer commitment to confidentiality/anonymity where possible and explains when identity may be disclosed (need-to-know, safeguarding/legal/regulatory/fair investigation) and that disclosure will be discussed where possible.</li> <li>•External reporting signposting improved: Added guidance to check whether an external body is a “prescribed person” (GOV.UK list) before reporting externally.</li> <li>•Malicious/vexatious allegations updated: Clarified that honest concerns won’t lead to disciplinary action if unsubstantiated; malicious/false allegations may lead to disciplinary action.</li> </ul>	SAT HR Team