



Education Trust

Inspiring the individuals of today, for a better society tomorrow

“Aspire, Belong, Collaborate”

WHISTLEBLOWING POLICY

Review Frequency	Annual
Reviewed	April 2026
Next Review	April 2027
Agreed by Trustees	1 st April 2026



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Purpose

The purpose of this policy is to make clear that employees can and should voice concerns without fear of victimisation, subsequent discrimination or disadvantage. It is intended that this policy will encourage and enable employees to raise serious concerns within the Riviera Education Trust (hereinafter referred to as 'the Trust') rather than overlooking a problem or 'whistleblowing' outside the organisation.

Scope

This policy applies to all employees and also to trainees, apprentices, volunteers and any other individuals working for or on behalf of the Trust. For the purposes of this policy, the term "employee" is used to refer to all such individuals.

Roles and Responsibilities

The Trust retains overall responsibility for this Whistleblowing Policy. Strategic oversight is provided by the Board of Trustees, with local oversight from the Local Standards Board and day-to-day management by school leadership, depending on the nature of the concern.

The Headteacher along with line managers are responsible for making employees aware of the existence of this policy. The Headteacher is responsible for maintaining a record of concerns raised and outcomes (but in a form which does not endanger confidentiality) and will report to the CEO as necessary. The CEO will report to the Board of Trustees.

Employees are responsible for making themselves familiar with and complying with this policy.

Policy Statement

Employees could be the first to realise that there may be something seriously wrong within the Trust. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Trust. They may also fear harassment or victimisation. In these circumstances the employee may feel it is easier to ignore the concern rather than report what may just be a suspicion of malpractice.

The Trust is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we expect employees and others we work with, who have serious concerns about any aspect of the Trust's work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.

This policy aims to encourage employees to feel confident about raising serious concerns and to question and act upon concerns, and to provide clear avenues for employees to raise those concerns and receive feedback on any action taken. This policy also aims to reassure employees that they will be protected from possible reprisals or victimisation if they have a reasonable belief that the disclosure has been made in the public interest.

Employees who make a protected disclosure will be protected from dismissal or detriment in accordance with the Public Interest Disclosure Act 1998.

Employees are reassured that raising serious concerns is encouraged and supported. Where an employee has concerns, raising concerns is in the best interests of colleagues and pupils within the Trust. Raising concerns will often aid the protection of children and also support colleagues.

Qualifying Disclosures

Qualifying disclosures are disclosures of information where the employee reasonably believes (and it is in the public interest) that one or more of the following matters is either happening, has taken place, or is likely to happen in the future

- A criminal offence
- The breach of a legal obligation
- A miscarriage of justice
- A danger to the health and safety of any individual
- Damage to the environment
- Bribery or corruption
- A deliberate attempt to conceal any of the above
- Sexual harassment or a failure by the Trust to take reasonable steps to prevent it

Where an issue relates to an individual's own employment the employee should raise the issue under the Grievance Procedure in the first instance. The Whistleblowing Policy is intended to cover major concerns that fall outside the scope of other procedures.

Any serious concerns that an employee may have about any aspect of conduct by employees of the Trust or others acting on behalf of the Trust may be reported under this policy. This policy does not replace the Trust's complaints procedure.

Safeguarding

Concerns relating to the safeguarding and welfare of children should be reported in accordance with the Trust's Safeguarding/Child Protection Policy, although they may also be raised under this policy where appropriate.

Sexual Harassment and Protected Disclosures

The Trust is committed to providing a safe, inclusive and respectful working environment free from sexual harassment, bullying and discrimination. Sexual harassment is unlawful under the Equality Act 2010, and the Trust will take reasonable steps to prevent it and respond appropriately where it occurs.

Concerns should normally be raised through appropriate internal procedures, such as the Grievance Procedure or Sexual Harassment Policy. However, concerns may also be raised under this policy where appropriate.

Sexual harassment may constitute a protected disclosure. Individuals raising concerns in good faith will be protected from victimisation or detriment.

Safeguards against Harassment or Victimisation

The Trust recognises that the decision to report a concern can be a difficult one to make. If what the employee is saying is true, or they have a reasonable belief that it is true, the employee will have nothing to fear because they will be doing their duty to the Trust and will be caring for/protecting pupils and colleagues within the Trust.

The Trust will not tolerate any harassment or victimisation (including informal pressure) and will take appropriate action to protect employees when concerns are raised with reasonable belief in the public interest.

Any investigation into allegations of potential malpractice will not influence, or be influenced by, any disciplinary or redundancy procedures that already affect an employee.

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal the identity of an employee who raises allegations under this policy. At the appropriate time, however, the employee may need to come forward as a witness.

Employees are encouraged to put their name to allegations wherever possible. Anonymous concerns will be considered; however, it may be more difficult to investigate and provide feedback where concerns are raised anonymously. Therefore, anonymous allegations will be considered at the discretion of the Headteacher in consultation with the CEO. A record of such allegations will be shared with the Board of Trustees.

While every effort will be made to maintain confidentiality, there may be circumstances where the Trust is required to disclose information (e.g. legal proceedings).

False Allegations

If an employee makes an allegation in reasonable belief it is in the public interest, but it is not confirmed by the investigation, no action will be taken against the employee. The Trust reserves the right to invoke the disciplinary procedure in the case of allegations made in bad faith.

How to Raise a Concern

In most circumstances, employees should raise concerns with the Headteacher or line manager. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of malpractice. For example, if the employee believes that the Headteacher is involved, the employee should approach the CEO. If the concern relates to the CEO, the employee should approach the Board of Trustees.

Trustee Contact:

Matt Redwood: Vice Chair of Trustees

Via the clerk to the Trustees: clerk@rivieraet.co.uk

Concerns may also be raised with Human Resources or the Trust's Designated Safeguarding Lead where appropriate.

Employees may also raise concerns with prescribed regulatory bodies (known as "prescribed persons"), such as Ofsted, where appropriate.

Concerns may be raised verbally or in writing. It is helpful for the following information to be provided: the background and history of the concern (giving relevant names and dates) and the reason why the employee is particularly concerned about the situation.

The earlier the employee expresses the concerns, the easier it will be to take action.

Although the employee is not expected to prove beyond reasonable doubt the truth of an allegation, the employee should demonstrate to the person contacted that there are reasonable grounds for the concern.

An employee may wish to consider discussing the concern with a colleague or trade union representative first and may find it easier to raise the matter if there are other colleagues who have the same experience or concerns.

Support and Advice

Employees who are considering raising a concern may wish to seek advice or support before doing so. This may include discussing the matter with a trusted colleague, trade union representative, Human Resources, or another appropriate professional body.

Employees can also seek independent advice from external organisations such as Protect or Citizens Advice.

The Trust recognises that raising a concern can be difficult and will take reasonable steps to support employees throughout the process.

How the Trust Will Respond

The Trust may need to make initial enquiries to assess the concerns. Where appropriate the concerns may be investigated by management, this could be through the disciplinary process where relevant; or form the subject of an independent inquiry.

In order to protect individuals and those accused of malpractice, initial enquiries will be made to decide whether an investigation is appropriate, and if so, what form it should take. Some concerns may be resolved by agreed action without the need for investigation.

Within 10 working days of a concern being raised the Headteacher will write to the employee:

- Acknowledging that a concern has been raised
- Indicating how it is proposed to deal with the matter
- Giving an estimate of how long it will take to provide a final response
- Telling the employee whether any initial enquiries have been made
- Telling the employee whether further investigations will take place and if not, why not.

The amount of contact between the individual considering the issue and the employee who raised the issue will depend on the nature of the matters raised; the potential difficulties involved and the clarity of information provided. If necessary, the Trust will seek further information from the employee.

The Trust accepts that the employee will need to be assured that the matter has been properly addressed and therefore the Trust will inform the employee of the steps that have been taken to resolve the matter as appropriate. Where the employee has raised concerns in writing, then the Trust should confirm their course of action in writing also.

Escalating Concerns

The aim of this policy is to enable employees to raise concerns internally within the Trust, with the expectation that they will be satisfied with the action taken. If this is not the case then they may raise their concerns to the CEO. If the employee wishes to take the matter further they may raise their concern with the Board of Trustees. If the employee wishes to take the matter outside of the organisation then the following are possible contact points:

- Protect (formerly Public Concern at Work)
- A relevant Trade Union
- Citizens Advice Bureau
- Relevant Professional Bodies
- Regulatory Organisations
- Local Police

If the employee chooses to take the matter outside of the Trust then the employee should ensure that they do not disclose confidential information. Employees are encouraged to raise concerns internally or with appropriate prescribed bodies. Disclosure to the media may not be protected unless strict legal conditions are met.

Note: In this policy working days refers to school days where children are expected to attend

You can whistleblow to Ofsted by: **Telephone: Whistleblowing Hotline (0300 1233155)**. It is staffed from 8am – 6pm, Monday – Friday.

Email: whistleblowing@ofsted.gov.uk

Post: WBHL, Ofsted, Piccadilly Gate, Store Street, Manchester, M1 2WD.

NSPCC Whistleblowing Advice Line: 0800 028 0285 or help@nspcc.org.uk

This policy applies equally to all employees and is underpinned by the Trust's commitment to equality, diversity and inclusion.

DETAILS OF AMENDMENTS

October 2018

- Updated to include Shiphay Learning Academy

July 2019

- Reviewed and references to LGBs changed to LSBs

September 2020

- P5 How to Raise a Concern. Head of School replaced by CEO in relation to escalating concerns about senior management
- Addition of definition of working days in relation to this policy

October 2021

- Chair of Finance and Audit Committee changed to Chair of Finance Committee

October 2022

- Pg4 Addition - A record of such allegations will be shared with the CEO and Trust Board

September 2023

- Reviewed without change

September 2024

- References to local standards boards (LSB) removed. The trust board has decided that LSBs should not be involved in complaints
- Pg 6 reference to escalation to include CEO following head of school and before escalation to trust board

September 2025

- No changes

April 2026

- Updated terminology for consistency (e.g. “MAT” and “school/MAT” replaced with “the Trust”; “worker” replaced with “employee”)
- Clarified governance and responsibilities, including the roles of the Board of Trustees, Local Standards Board, and school leadership
- Improved overall wording for clarity, consistency, and readability
- Updated and standardised section headings (e.g. *Escalating Concerns, How the Trust Will Respond*)
- Added Safeguarding section
- Strengthened the section on Sexual Harassment and Protected Disclosures
- Updated external contacts and removed outdated references (e.g. inclusion of Protect)
- Added Support and Advice section
- Ensured alignment with relevant legislation, including the Public Interest Disclosure Act 1998 and the Equality Act 2010