Bishop Luffa Learning Partnership

Rooted in Love, Together we Flourish

Confidential Reporting (Whistleblowing) Policy

Approved by: Bishop Luffa Learning Partnership Trust Board of Trustees
Date: May 2026
Next review due by: May 2028

19 May 2026 Status Approved

1. Aims

This policy sets out the Bishop Luffa Learning Partnership confidential reporting (whistleblowing) arrangements. It applies to the Trust and to all of its individual schools.

The policy aims to:

- Encourage individuals to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously, investigated appropriately and that their confidentiality will be respected where possible.
- Make sure all those working in or with the Trust and its schools know how to raise concerns about potential wrongdoing.
- Set clear procedures for how the Trust will respond to such concerns.
- Explain the protection available to people who raise a whistleblowing concern in good faith.
- Assure people that they will not be victimised or suffer detriment for raising a legitimate concern through the steps set out in this policy, even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue).

This policy does not form part of any employee's contract of employment and may be amended at any time.

2. Scope and who the policy applies to

This policy applies to all individuals who work for, or provide services to, the Trust or any of its schools, including:

- Employees.
- Workers, including agency workers.
- Self-employed consultants or contractors who provide services on a personal basis.
- Trustees and members of Trust committees.
- Local governors.
- Volunteers and others working in our schools on a regular or occasional basis.

The term "whistleblower" in this policy means any person who raises a genuine concern relating to wrongdoing covered by this policy.

3. Legislation and guidance

The requirement for academy trusts to have clear whistleblowing procedures in place is set out in the Academy Trust Handbook and in our funding agreement and articles of association.

This policy has been written with regard to the following legislation and guidance:

- Public Interest Disclosure Act 1998 (PIDA).
- Employment Rights Act 1996 (as amended by PIDA).
- Academy Trust Handbook (as updated from time to time).
- Department for Education (DfE) guidance on whistleblowing and disclosures to prescribed persons.
- ACAS guidance on whistleblowing at work.

Under PIDA, certain disclosures of information by workers are protected if they are made in the public interest and concern specified categories of wrongdoing. Workers who make a protected disclosure are legally protected from dismissal or suffering a detriment because they have made that disclosure.

4. What is whistleblowing?

Whistleblowing covers concerns that report wrongdoing which is in the public interest. A disclosure is more likely to be in the public interest if it relates to something that affects others, such as pupils, staff, the wider community or the use of public funds.

Examples of whistleblowing concerns include (but are not limited to):

- Criminal offences, such as fraud, theft or corruption.
- Pupils' or staff members' health and safety being put in danger.
- Failure to comply with a legal obligation or statutory requirement.
- Breaches of financial management or internal control procedures.
- Serious safeguarding concerns or abuse of pupils.
- Deliberate concealment of information about any of the above, or any other wrongdoing in the public interest.
- Damage to the environment.
- Sexual harassment

Not all concerns about the Trust or an individual school will count as whistleblowing. For example, personal staff grievances about an individual's own employment situation will normally be dealt with under the Trust's grievance or dignity at work procedures rather than under this policy.

If a concern relates primarily to an individual's own employment or working conditions, it is likely to be more appropriate to use the staff grievance procedure. Concerns from parents, carers or members of the public about the Trust or its schools will normally be dealt with under the complaints procedure. Safeguarding concerns about the behaviour of adults towards children must be reported immediately in line with the Trust's safeguarding and child protection policy and local authority designated officer (LADO) procedures.

Protect (formerly Public Concern at Work) provides further guidance on the difference between a whistleblowing concern and a grievance, and runs a free and confidential advice line for individuals who are unsure how to raise a concern.

5. Protection for whistleblowers

The Trust is committed to creating a culture where staff and others feel able to raise concerns in the knowledge that they will be taken seriously and that they will not suffer detriment as a result.

A worker who makes a qualifying disclosure in the public interest under PIDA is protected in law from:

- Dismissal (including selection for redundancy) because they made a protected disclosure.

- Suffering any detriment (such as denial of training or promotion opportunities, intimidation, bullying, victimisation, or other disadvantage) because they made a protected disclosure.

No person will be victimised, subjected to detriment or dismissed for raising a whistleblowing concern in good faith, even if, after investigation, it is found that no wrongdoing took place.

Any manager or colleague who subjects a whistleblower to detrimental treatment because they have raised a concern under this policy will be subject to appropriate disciplinary action.

6. Confidentiality and anonymous concerns

The Trust will treat whistleblowing concerns raised under this policy as far as possible in confidence and will not reveal the identity of the person raising the concern without their consent, unless there is a legal or overriding public interest reason to do so (for example, where the matter must be reported to the police, a regulator or safeguarding authority).

There may be circumstances where the Trust cannot resolve a concern without revealing the whistleblower's identity (for example, where their evidence is required in disciplinary or criminal proceedings). In such cases, the Trust will discuss this with the whistleblower before any action is taken.

Concerns may be raised anonymously. Anonymous disclosures will be considered and investigated as far as possible. However, anonymity can make it more difficult to investigate the concern fully or to provide feedback on the outcome. The Trust therefore encourages individuals, where possible, to provide their name and contact details when raising a concern.

7. Procedure for raising a whistleblowing concern

7.1 When to raise a concern

Individuals should consider the examples in section 4 when deciding whether their concern is of a whistleblowing nature. Consider whether the incident(s) was illegal, breached statutory or Trust procedures, put people in danger or was an attempt to cover up any such activity.

7.2 Who to report to

In most cases, school-based staff should first raise their concern with their Headteacher.

If the concern is about the Headteacher, or it is believed that they may be involved in the wrongdoing in some way, the staff member should raise their concern with the Chair of the Local Governing Body for that school.

If the concern is about the Chief Executive Officer (CEO) of the Trust, the concern should be raised with the Chair of the Board of Trustees.

If the concern is about the Chair of the Board of Trustees, the Board collectively, or the governance of the Trust as a whole, the individual may raise their concern directly with an appropriate external prescribed body (see section 10) and/or with the Trust's external auditor or legal advisers.

Any Trust central staff who are not based in a school should normally raise concerns with their line manager in the first instance, or with the CEO where this is not appropriate.

7.3 How to raise the concern

Concerns should normally be raised in writing, wherever possible. The written concern should include:

- The background and history of the concern, including relevant dates.
- Names of those involved in the alleged wrongdoing.
- The reason why the individual is particularly concerned about the situation.
- Any evidence available to support the concern.
- Details of any personal interest in the matter.

Where an individual feels unable to put the concern in writing, they may request a meeting with the appropriate person (see 7.2) to explain the concern verbally. They may be accompanied at this meeting by a trade union or professional association representative or a work colleague.

8. How the Trust will respond

8.1 Initial response and triage

When a concern is received by a recipient (as described in section 7.2), they will:

- Acknowledge receipt of the concern in writing normally within 5 working days.
- Arrange to meet with the person raising the concern within a reasonable time (normally within 10 working days of acknowledgment), where contact details have been provided.
- At the meeting, obtain as much detail as possible about the concern and record the information.
- Assess whether the concern appears to fall within the scope of this whistleblowing policy or should more appropriately be handled under another procedure (for example, grievance, complaints or safeguarding). If so, the individual will be advised of this and the concern will be signposted to the relevant procedure.
- Reiterate at the meeting that the individual is protected from unfair treatment or dismissal as a result of raising the concern in good faith, and explain how confidentiality will be managed.

8.2 Investigation

If there is sufficient cause for concern to warrant further investigation, the recipient will arrange for an investigation to be carried out. Depending on the nature and seriousness of the concern, this may involve:

- An internal investigation by an appropriate senior leader, member of the Executive Board, Trustee or governor who is independent of the area of concern.
- A joint investigation involving more than one school or part of the Trust, where the concern spans different areas.
- Referral to an external, independent body to investigate.
- Reporting the matter to the police, local authority, regulator or other external agency where required.

The investigation will be conducted fairly, proportionately and without unreasonable delay. The person investigating may need to speak to the whistleblower, the person(s) alleged to be responsible for the wrongdoing and any witnesses, and may need to review relevant documents and records.

8.3 Keeping the whistleblower informed

Where contact details are available, the Trust will keep the individual who raised the concern informed, as far as reasonably practicable, of the progress of the investigation and its likely timescale. They will normally receive:

- An acknowledgement of the concern (see 8.1).
- An indication of how the matter will be dealt with and an estimated timeframe.
- A notification when the investigation has been concluded and, where appropriate, a summary of the outcome.

In some circumstances, the information that can be shared may be limited by the need to protect the confidentiality of others or by legal obligations (for example, in relation to ongoing disciplinary or criminal proceedings).

8.4 Outcome of the investigation

Once the investigation is complete, the investigating person(s) will prepare a report detailing their findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details of how the matter can be rectified and whether any referrals are required to external organisations (such as the local authority, regulator or police).

Beyond the immediate actions, the CEO, Trustees and other relevant staff will review any learning from the case and consider whether changes are needed to policies, procedures, systems or training to prevent future occurrences of similar issues.

9. Malicious or vexatious allegations

Individuals are encouraged to raise concerns when they reasonably believe there may be an issue. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the person who raised the concern.

If, however, an allegation is shown to be deliberately false, malicious or made for personal gain, the Trust will consider whether disciplinary action is appropriate against the person making the allegation, in line with the relevant disciplinary procedures.

10. Escalating concerns beyond the Trust (external disclosures)

The Trust encourages individuals to raise their concerns internally in the first instance, in line with section 7 of this policy, as this gives the Trust the opportunity to address matters quickly and effectively.

However, the law recognises that in some circumstances it may be appropriate for individuals to make a disclosure to an external person or body (a "prescribed person").

In order to qualify for protection, such disclosures must meet the legal requirements in PIDA, including that they are made in the public interest.

Examples of prescribed persons and bodies relevant to the Trust include (but are not limited to):

- Department for Education (DfE) / Education and Skills Funding Agency (ESFA) – for concerns about the conduct of academies and academy trusts.
- Ofsted – for concerns about the welfare and safeguarding of pupils in schools.
- The Health and Safety Executive (HSE) – for concerns about health and safety at work.
- The Information Commissioner's Office (ICO) – for concerns about data protection and freedom of information.
- The Trust's external auditor – for concerns about financial irregularities.
- Protect (formerly Public Concern at Work) – for confidential advice on whistleblowing.

Up-to-date contact details for prescribed persons and bodies are available on the Government website.

Individuals who are considering making a disclosure to a prescribed person are encouraged to seek independent advice first, for example from Protect, a trade union or professional association.

11. Governance, oversight and culture

The Board of Trustees is responsible for ensuring that this policy is in place, is reviewed regularly and is operating effectively across the Trust and its schools.

The Board (or an appropriate committee such as the Finance, Audit and Risk Committee) will receive, at least annually, anonymised information on whistleblowing concerns raised under this policy, the broad nature of the issues, and any lessons learned, so that it can be assured that concerns are handled properly and fairly.

The Trust is committed to fostering a culture of openness and accountability, where staff and others feel able to speak up about genuine concerns. The Trust will promote awareness of this policy through induction, staff communications and training, and will provide appropriate training for leaders and governors on handling whistleblowing concerns.

12. Publication and communication of this policy

This policy will be published on the Trust's website and made readily accessible to all staff and others to whom it applies. It will also be available on individual school websites or staff intranets as appropriate.

All staff will be made aware of this policy and the whistleblowing arrangements as part of their induction and through periodic reminders. Managers are responsible for ensuring that staff understand how to raise concerns under this policy.

13. Links with other policies and procedures

This policy links with the Trust's policies and procedures on (this list is not exhaustive):

- Staff grievance procedure.
- Staff disciplinary policy.
- Complaints procedure.
- Safeguarding and child protection policy.
- Code of conduct for staff.
- Data protection and information security policies.

14. Approval and review

This policy will be reviewed every two years, or sooner if there are significant changes in legislation or guidance. The Board of Trustees will approve this policy and any subsequent revisions.