



Northern Arch
LEARNING PARTNERSHIP

Trust Whistleblowing Policy

Approved by: Standards Committee

Review frequency: Annually

Date of last review: Summer Term 2026

Date of next review: Summer Term 2027

1. Introduction

- 1.1. Northern Arch Learning Partnership is committed to the highest possible standards of openness, honesty, integrity and accountability. The Trust recognises that employees are often the first to realise that there may be something seriously wrong within their organisation and that the Trust aims to encourage employees and others with concerns to come forward and be raise concerns (whistleblowing).
- 1.2. The Trust is committed to promoting a culture of openness where individuals feel safe and supported to speak up and raise concerns in the public interest.
- 1.3. This policy has been revised to reflect current guidance, including:
 - Whistleblowing: Guidance & Code of Practice for Employers
 - Working Together to Safeguard Children
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
 - Guidance from the Local Children's Safeguarding Partnership
<https://www.darlington-safeguarding-partnership.co.uk>
 - Sir Robert Francis' Freedom to Speak Up Review. Although the review focuses on the NHS, its principles apply to other sectors, including education
<http://freedomtospeakup.org.uk>
- 1.4. Please also refer to the whistleblowing sections within individual Academy's Safeguarding and Confidential Reporting Policies.
- 1.5. The policy has been shared with the relevant Trade Unions.

2. Aims

- 2.1. This policy aims to:
 - Encourage employees to feel confident in raising concerns
 - Reassure employees that they will be protected from reprisals or victimisation
 - Provide clear routes to raise concerns and receive feedback
 - Ensure employees receive a response and understand how to escalate concerns if necessary
- 2.2. In addition to the above, this policy aims to ensure that concerns raised meet the criteria of a "protected disclosure" under the Public Interest Disclosure Act 1998 (PIDA), and that individuals are afforded all legal protections associated with such disclosures

3. Scope

- 3.1. This policy applies to all Academies, Trust employees, volunteers, agency workers, contractors and suppliers.
- 3.2. For the avoidance of doubt, this policy applies to all individuals defined as “workers” under whistleblowing legislation, including employees, agency workers, trainees, contractors, and others working on behalf of the Trust.

4. Responsibilities

- 4.1. The Board of Trustees has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 4.2. The Whistleblowing Officer (Trust Operations & Business Manager) has day-to-day operational responsibility for this policy and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.
- 4.3. The Whistleblowing Officer will maintain a corporate register of the number and nature of the concerns raised and the outcomes (but in a form which does not endanger confidentiality) and will report as necessary to the Board of Directors, where appropriate.
- 4.4. Managers at all levels must take all concerns seriously, escalate them appropriately, avoid unauthorised investigation, and ensure that no action could be perceived as victimisation or suppression of concerns raised in good faith.
- 4.5. All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing

5. What is Whistleblowing?

- 5.1. Whistleblowing is term used when a person passes on information concerning wrongdoing. The wrongdoing will typically (although not necessarily) be something they have witnessed at work.
- 5.2. To qualify for protection under whistleblowing law, a disclosure must be a “protected disclosure.” This means the individual must reasonably believe that:
 - The disclosure is made in the public interest
 - The disclosure tends to show past, present or likely future wrongdoing
- 5.3. The second is that they must reasonably believe is that the disclosure tends to show past, present or likely future wrongdoing falling into one or more of the following categories:

- Criminal offences (this may include, for example, types of financial impropriety such as fraud)
- Failure to comply with an obligation set out in law
- Miscarriages of justice
- Endangering of someone's health and safety including safeguarding or welfare concerns relating to children or vulnerable individuals. This may include serious misconduct, inappropriate behaviour, or conduct (including sexual harassment) that could pose a risk to others or breach legal or professional standards.
- Damage to the environment
- Covering up wrongdoing in the above categories
- Sexual harassment or serious inappropriate conduct (where in the public interest)

5.4. A whistle-blower 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 the Trust's or an Academy's activities (a whistleblowing concern) you should report it under this policy.

5.5. 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 refer to the Trust Dignity at Work Policy.

5.6. 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 supplier or service provider.

5.7. Where a concern relates to the safety or welfare of a child, it must be treated as a safeguarding matter and reported immediately in line with Safeguarding and Child Protection procedures, which take precedence over this policy

6. Protection and support for Whistle-blowers

6.1. It is understandable that whistle-blowers are sometimes worried about possible repercussions.

6.2. The Trust and its Academies encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

6.3. The Trust recognises that the decision to make a disclosure can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice or from other employees.

- 6.4. The Trust and its Academies will not tolerate bullying, harassment or victimisation and will take action to protect you when you raise a concern using this policy.
- 6.5. Whistle-blowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal (including selection for redundancy), disciplinary action, threats or other unfavourable treatment connected with raising a concern.
- 6.6. No individual will suffer any disadvantage or be subject to disciplinary action for raising a genuine concern in accordance with this policy).
- 6.7. Employees who make a disclosure that is deemed to be in the public interest are protected under the Public Interest Disclosure Act 1998 (PIDA).
- 6.8. Any employee who believes they have suffered detriment or retaliation as a result of raising a concern should report this immediately. Such matters will be treated as a serious disciplinary issue.

7. Confidentiality

- 7.1. The Trust will do its best to protect your identity if you request confidentiality. If you ask us to protect your identity by keeping your confidence, we will not disclose it without your consent or unless instructed by a Tribunal or Court.
- 7.2. If the situation arises where we are not able to resolve the concern without revealing your identity we will discuss with you whether and how we can proceed.
- 7.3. All information will be handled in accordance with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018. Records will be securely stored and only shared on a strictly need-to-know basis.

8. Anonymous Allegations

- 8.1. This policy strongly encourages you to put your name to your allegation. Concerns expressed anonymously will be much more difficult for the Trust to look into or to protect your position or to give you feedback. Concerns raised anonymously are much less powerful and less likely to be effective, but they will be considered at the discretion of the Trust.
- 8.2. In exercising discretion, the factors to be taken into account would include:
 - The seriousness of the issues raised;
 - The credibility and plausibility of the concern; and
 - The likelihood of confirming the allegation from attributable sources.

9. Untrue or Malicious Allegations

- 9.1. If you make an allegation that you reasonably believe is true, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make malicious or vexatious allegations, disciplinary action may be taken against you.
- 9.2. No disciplinary action will be taken where a concern is raised in good faith, even if it is not upheld.

10. How to make a Disclosure

- 10.1. As a first step, you should normally raise concerns with your immediate manager or their superior. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice.
- 10.2. If you believe that management is involved, you should approach the Head Teacher/Principal. If you have a concern about these officers, you should approach the Chief Executive Officer.
- 10.3. If you have a concern regarding the Chief Executive Officer you should approach the Chair of the Board of Directors in the first instance.
- 10.4. Concerns can be raised verbally but are better raised in writing. You are invited to set out the background and history of the concern, giving names, dates and places where possible, and the reason why you are particularly concerned about the situation. If you do not feel able to put your concern in writing, you can telephone or meet the appropriate person.
- 10.5. Employees are encouraged to raise concerns as early as possible to enable prompt action and minimise risk. The earlier you express the concern, the easier it is to take action. Although you are not expected to prove the truth of an allegation, you will need a reasonable basis for your concern.
- 10.6. To ensure legal protection, concerns should normally be raised internally or with a prescribed body, in line with whistleblowing legislation.
- 10.7. You may also invite your trade union or professional association to raise a matter on your behalf.

11. How the Trust will respond

- 11.1. The action taken by the Trust will depend on the nature of the concern. The matters raised may:
 - Be investigated internally;
 - Be referred to the Police.

- 11.2. All concerns will be handled promptly, fairly and impartially, and in a confidential manner as possible.
- 11.3. In order to protect individuals and the Trust, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures (for example, child protection) will normally be referred for consideration under those procedures. Some concerns may be resolved by agreed action without the need for investigation
- 11.4. Investigations will be:
- Proportionate to the seriousness of the concern
 - Conducted by an appropriately independent person where possible
 - Properly documented, with outcomes recorded
- 11.5. Within ten working days the Trust will write to you:
- Acknowledge receipt
 - Outline next steps
 - Provide an indicative timescale for investigation
 - Confirm whether initial enquiries have taken place
 - Confirm whether a full investigation will follow
- 11.6. The amount of contact between those considering the issues and you, will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, further information will be sought from you.
- 11.7. When any meeting is arranged, you may to be accompanied by a Trade Union representative or a work colleague who does not have a conflict of interest.
- 11.8. The Trust recognises that you need to be assured that the matter has been properly addressed and as such, where possible, the Trust will provide information in this regard.
- 11.9. While the Trust will seek to provide feedback, there may be circumstances (e.g. confidentiality or legal constraints) where full details cannot be shared.
- 11.10. A written record of all concerns raised, investigations undertaken, and outcomes will be maintained securely. This ensures transparency, consistency, and appropriate oversight.

12. Independent Advice

- 12.1. If you are unsure whether to use this Policy please speak to the Whistleblowing Officer – The Trust Head of People.
- 12.2. Alternatively you may want to seek independent advice by contacting:
 - Your union
 - Your professional body
 - The whistleblowing charity, [Protect | Speak Up, Stop Harm](#)

13. External Disclosures

- 13.1. This policy is intended to provide you with an avenue to raise concerns within the Trust and your Academy and to give you the reassurance you need to raise such matters internally. The Trust hopes you will be satisfied.
- 13.2. If you are not, and if you feel it is right to take the matter outside the Trust you should contact a prescribed person or body (guidance is available from [Whistleblowing: list of prescribed people and bodies - GOV.UK](#))
- 13.3. This includes a list of public bodies, which can deal with particular areas of concern e.g. Education, Finance etc.
- 13.4. You can also make a disclosure to a solicitor or the police.
- 13.5. You should tell the prescribed person or body if you think that the Trust:
 - Will cover the issue up
 - Treat you unfairly if you complained
 - Hasn't sorted the issue out and you've already reported it.
- 13.6. External disclosures may qualify for legal protection where they are made to a prescribed person or body and the individual reasonably believes the information is substantially true and concerns fall within that body's remit.
- 13.7. Employees are strongly encouraged to seek independent advice before making an external disclosure.