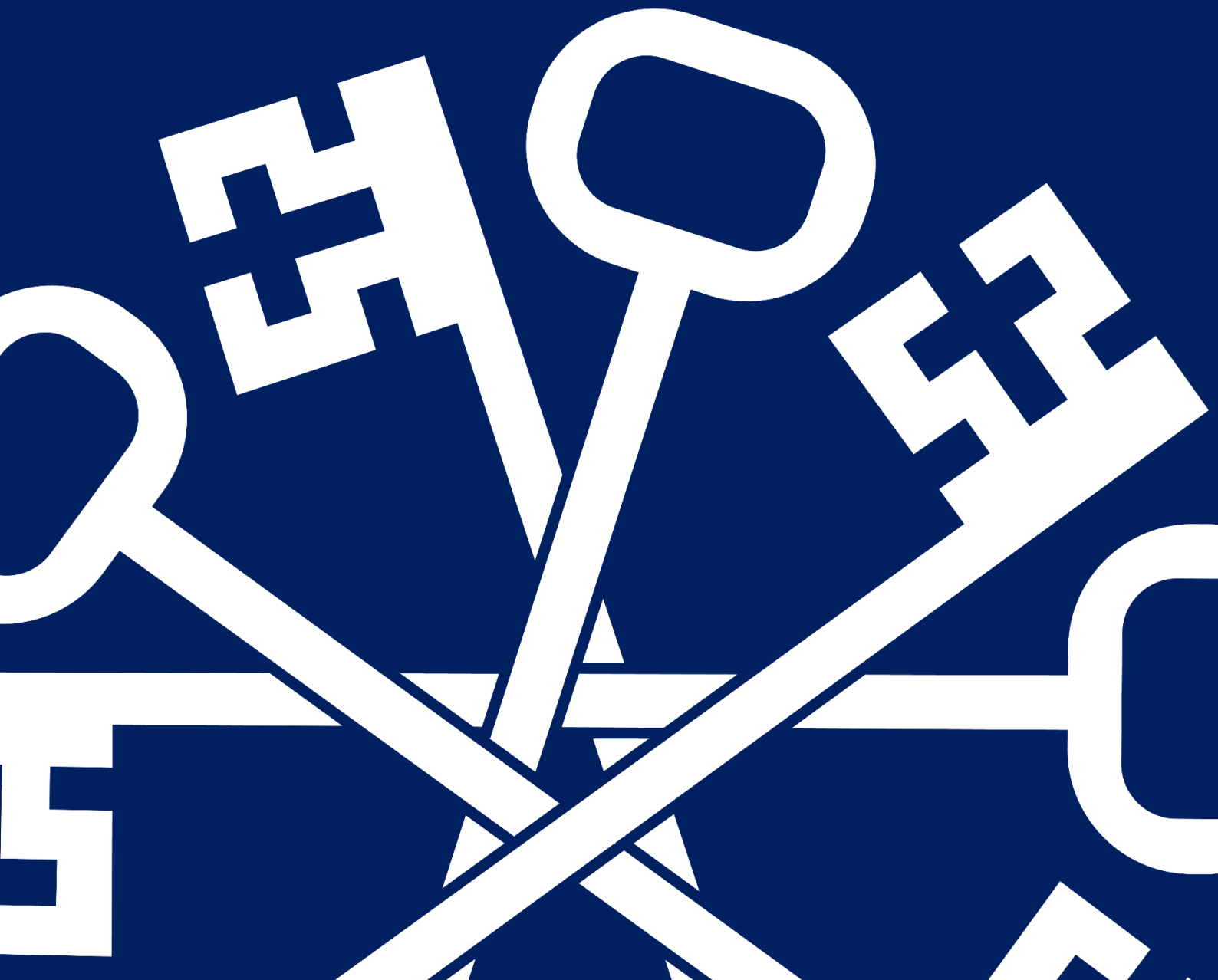




KEYS
ACADEMIES
TRUST

Whistleblowing Policy

Version 3.1



Contents

1. Policy Statement.....	2
2. Change Summary.....	2
3. Purpose.....	2
4. Background.....	2
5. Aims of the Policy.....	3
6. Definitions.....	4
7. Safeguards.....	5
8. How to raise a Concern.....	6
9. The Role of Headteachers	7
10. Outcome of the investigation	9
11. Raising Concerns Outside the School and Trust	10
12. Monitoring and Review	11
13. Version History	11

1. Policy Statement

- 1.1. At the heart of our mission is the belief that every individual has untapped potential waiting to be unlocked. By fostering an environment that challenges and supports growth, we want to create pathways for social mobility. By providing the right tools, guidance, and opportunities, we enable each person to overcome barriers and reach their fullest potential.
- 1.2. We want our schools to not only places of learning but vibrant communities where every person feels they truly belong. Within this students, teachers, and support staff alike should feel they are developing and succeeding. This success should be an achievable reality for all, irrespective of background or circumstance. It may be quite different for each of us, but the key is the feeling of pride in doing well and enjoyment of the journey.
- 1.3. We are committed to building inclusive environments where the uniqueness of every individual is celebrated, and where collective growth is the norm.

2. Change Summary

- 2.1. 3.1 Changes made in-line with statutory updates in relation to sexual harassment duties.
- 2.2. 3.0: Changes made in-line with statutory updates. Trustee link for whistleblowing named.
- 2.3. 2.0: changes made in-line with statutory updates.

3. Purpose

- 3.1. To set out the Board of Trustee's policy and procedure for dealing with concerns raised by employees which relate to suspected wrongdoing or dangers at work (see paragraph 5). Allegations of child abuse against teachers and other staff and volunteers is to be dealt with in accordance with Keeping Children Safe in Education statutory guidance for schools and colleges.
- 3.2. The Board of Trustees of Keys Academies Trust ("the Trust") is committed to tackling fraud, abuse and other forms of malpractice and, therefore, has introduced this procedure to enable employees, officers, consultants, contractors, volunteers, casual workers and agency workers ("colleagues") to raise their concerns about such malpractice at an early stage and in the correct way.
- 3.3. This policy complies with our funding agreement and articles of association.

4. Background

- 4.1. As colleagues are often the first to realise that there may be something wrong within the school, it is important that they feel able to express their concerns without fear of harassment or victimisation, otherwise they may find it easier to ignore the concern rather than report it. The Public Interest Disclosure Act 1998 recognises this fact and is designed to protect colleagues, who make certain disclosures of information in 'the public interest', from detriment and/or dismissal. This policy builds on the provisions of the Act.
- 4.2. This policy reflects changes introduced by the Employment Rights Act 2025, which from 6 April 2026 expressly include disclosures about sexual harassment as protected whistleblowing disclosures. The Trust board is committed to creating an environment where staff feel able to speak up without fear of reprisal and supports these legislative updates, which aim to address the known under reporting of workplace sexual harassment.
- 4.3. The Board of Trustees is committed to the highest possible standard of operation, probity and accountability. In line with that commitment, those colleagues with serious concerns are encouraged to come forward and voice those concerns. This policy document makes it clear that raising a concern should be done so without fear of reprisals; it is intended to encourage and enable colleagues to raise serious concerns within a school or the Trust, rather than overlooking a problem or alerting anyone external to the Trust, in the first instance.
- 4.4. This policy does not form part of any employee's contract of employment and it may be amended at any time.
- 4.5. This policy applies to all employees or other workers who provide services to the Trust in any capacity, including self-employed consultants or contractors who provide services on a personal basis and agency workers.
- 4.6. This policy has been written in line with the Academy Trust Handbook, as well as [government guidance on whistleblowing](#). We also take into account the [Public Interest Disclosure Act 1998](#).
- 4.7. Our nominated Trustee link for Whistleblowing is: Stela Plamenova

5. Aims of the Policy

- 5.1. This policy aims to:
 - a) Encourage individuals affected to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated, and that their confidentiality will be respected;
 - b) Let all staff in the Trust know how to raise concerns about potential wrongdoing in or by the Trust;
 - c) Set clear procedures for how the Trust will respond to such concerns;
 - d) Let all staff know the protection available to them if they raise a whistle-blowing concern;

- e) Assure staff that they will not be reprimanded and/or victimised for raising a legitimate concern through the steps set out in the policy, even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue);
- f) allow colleagues to take the matter further if they are dissatisfied with the Board of Trustees' response.

6. Definitions

- 6.1. A **whistleblower** is a person who raises a genuine concern relating to the matters below. If colleagues have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities that are 'in the public interest' (a Whistleblowing concern) they should report it under this policy without delay.
- 6.2. **Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers that are 'in the public interest'. This may include:
 - a) criminal activity;
 - b) miscarriages of justice;
 - c) danger to health and safety;
 - d) damage to the environment;
 - e) failure to comply with any legal or professional obligation or regulatory requirements;
 - f) bribery;
 - g) financial fraud or mismanagement;
 - h) negligence;
 - i) breach of our internal policies and procedures
 - j) conduct likely to damage our reputation;
 - k) unauthorised disclosure of confidential information;
 - l) public examination fraud
 - m) concerns relating to sexual harassment, whether past, ongoing, or likely to occur
 - n) the deliberate concealment of any of the above matters.
- 6.3. Before initiating the procedure colleagues should consider the following:
 - a) the responsibility for expressing concerns about unacceptable practice or behaviour rests with all colleagues;
 - b) colleagues should use line manager or team meetings and other opportunities to raise questions and seek clarification on issues which are of day-to-day concern;

- c) whilst it can be difficult to raise concerns about the practice or behaviour of a colleague, all must act to prevent an escalation of the problem and to prevent themselves being potentially implicated.
- 6.4. This policy should not be used for complaints about an employee's personal circumstances, such as the way they have been treated at work. In these cases, an employee should use the Trust's Grievance Procedure (or Bullying and Harassment Policy and procedure as appropriate). However, concerns relating to sexual harassment that an employee reasonably believes amount to a matter of public interest may constitute a protected disclosure under whistleblowing legislation and may be raised under this policy. If the matter relates to salary, the salary review procedures documented in the Trust's Pay Policy should be referenced.
- 6.5. This policy should not be used to raise low-level concerns. All low-level concerns regarding school staff must be reported to the Headteacher. All low-level concerns regarding central Trust staff or Headteachers must be reported to the CEO. All low-level concerns regarding the CEO should be reported to the Chair of Trustees. More information is available via the Trust's Allegations of Abuse policy.

7. Safeguards

7.1. Harassment or Victimisation

The Board of Trustees recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The Board of Trustees will not tolerate harassment or victimisation and will take action to protect colleagues when they have a genuine concern.

This does not mean that if an employee is already the subject of internal procedures such as disciplinary or redundancy, that those procedures will be halted as a result of that employee raising a concern under the Whistleblowing policy.

7.2. Confidentiality

We hope that colleagues will feel able to voice Whistleblowing concerns openly under this policy. The Board of Trustees will make every effort to protect a colleague's identity wherever reasonably practicable if confidentiality is requested.

As indicated above, identity will be protected as far as possible, but should the investigation into the concern require the colleague to be named as the source of the information, this will be discussed with the colleague before their name is disclosed.

The Board of Trustees recognises that disclosures relating to sexual harassment may require heightened sensitivity. Confidentiality will be prioritised wherever reasonably practicable.

7.3. Anonymous Allegations

Colleagues are encouraged to put their name to an allegation or concern. Proper investigation may be more difficult or impossible if we cannot obtain further information and it is also more difficult to establish whether allegations are credible. Anonymous allegations will be considered at the discretion of the Board of Trustees. In exercising the discretion, the factors to be taken into account would include:

- a) the seriousness of the issues raised;
- b) the credibility of the concern; and
- c) the likelihood of confirming the allegation from attributable sources.
- d) when they relate to a child or vulnerable adult

7.4. Untrue Allegations

If a colleague makes an allegation where they have a genuine concern, but it is not confirmed by the investigation, no action will be taken against that colleague. If, however, we conclude that a colleague has made malicious or vexatious allegations, or with a view to personal gain, disciplinary action may be taken against that colleague.

7.5. Unfounded Allegations

Following investigation, allegations may be confirmed as unfounded. This outcome will be notified to the colleague who raised the concern, who will be informed that the Board of Trustees deems the matter to be concluded and that it should not be raised again unless new evidence becomes available.

7.6. Support to Colleagues

It is recognised that raising concerns can be difficult and stressful. Advice and support will be made available, as appropriate to both the colleague(s) raising the concerns and any colleague(s) subject to investigation.

Colleagues may wish to consult with their Trade Union or make use of the Employee Assistance Programme (EAP) available specific to their setting.

7.7. Vested Interest

Any colleague whose relative/friend is the subject of a complaint will not be involved in the handling of the complaint.

8. How to raise a Concern

- 8.1. As a first step, a colleague should normally raise concerns with their Headteacher. For central Trust staff, concerns should be raised with the CFOO. For Headteachers, concerns should be raised with the CEO. This depends, however, on the seriousness and sensitivity of the issues and who is involved. For example, if a colleague believes that their Headteacher or their superior is involved, they should approach the Trust Chief Executive Officer or Chair of the Board of Trustees.

- 8.2. Concerns are better raised in writing. The colleague should set out the background and history of the concerns, giving names, dates and places where possible, and the reasons why they are particularly concerned about the situation. If a colleague does not feel able to put the concern in writing, they should telephone or meet the appropriate person. It is important that, however the concern is raised, the colleague makes it clear that they are raising the issue via the Whistleblowing policy and procedure.
- 8.3. The earlier a colleague expresses the concern, the easier it is to take action.
- 8.4. Although a colleague is not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for the concern.
- 8.5. In some instances, it may be appropriate for a colleague to ask a trade union to raise a matter on their behalf.
- 8.6. At each meeting under this policy the colleague may bring a workplace companion or trade union representative. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

9. The Role of Headteachers

- 9.1. A Headteacher may be informed by a colleague about concern(s) and that they are “blowing the whistle” within the procedure in person or in writing or over the phone.
- 9.2. The Headteacher should respond immediately by arranging to meet with the colleague to discuss the concern(s) as soon as possible.
- 9.3. Stage One:

At the initial meeting the Headteacher should establish that:

- a) There is genuine cause and sufficient grounds for the concern; and
- b) the concern has been appropriately raised via the Whistleblowing Policy.

The Headteacher should ask the colleague to put their concern(s) in writing, if they have not already done so. If the colleague is unable to do this the Headteacher will take down a written summary of the colleague’s concern(s) and provide them with a copy after the meeting. The Headteacher should make notes of the discussions with the colleague. The colleague’s letter and/or Headteacher’s notes should make it clear that the colleague is raising the issue via the Whistleblowing procedure and provide:

- i. the background and history of the concerns;
- ii. names, dates and places (where possible); and
- iii. the reasons why the colleague is particularly concerned about the situation.

The colleague should be asked to date and sign their letter and/or the notes of any discussion. The Headteacher should positively encourage the colleague to do this, as a concern expressed anonymously is much less powerful and much more difficult to address, especially if the letter/notes become evidence in other proceedings, e.g. an internal disciplinary hearing.

The Headteacher should follow the policy as set out above and in particular explain to the colleague:

- a) who they will need to speak to determine the next steps ;
- b) what steps they intend to take to address the concern;
- c) how they will communicate with the colleague during and at the end of the process;
- d) it should be noted that the need for confidentiality may prevent the school giving the colleague specific details of any necessary investigation or any necessary disciplinary action taken as a result;
- e) that the colleague will receive a written response within ten working days;
- f) that their identity will be protected as far as possible, but should the investigation into the concern require the colleague to be named as the source of the information, that this will be discussed with the colleague before their name is disclosed;
- g) that the Board of Trustees will do all that it can to protect the colleague from discrimination and/or victimisation;
- h) that the matter will be taken seriously and investigated immediately;
- i) that if the colleague's concern, though raised as a genuine concern, is not confirmed by the investigation, no punitive action will be taken against them;
- j) that if clear evidence is uncovered during the investigation that they have made a malicious or vexatious allegation, disciplinary action may be taken against them; and
- k) the investigation may confirm their allegations to be unfounded in which case the Board of Trustees will deem the matter to be concluded unless new evidence becomes available.

9.4. Stage Two:

Following the initial meeting with the employee, the Headteacher should consult with the Chief Finance and Operating Officer, who in turn will liaise with the Chief Executive Officer of the Trust and/or Chair of the Board of Trustees to determine whether an investigation is appropriate and, if so, what form it should take. A record should be made of the decisions and/or agreed actions.

It may be necessary, with anonymous allegations, to consider whether it is possible to take any further action. When making this decision, Headteachers should take the following factors into account:

- a) the seriousness of the issue(s) raised;
- b) the credibility of the concern(s); and
- c) the likelihood of confirming the allegation(s) from attributable sources.

In some cases, it may be possible to resolve the concern(s) simply, by agreed action or an explanation regarding the concern(s), without the need for further investigation. However, depending on the nature of the concern(s) it may be necessary for the concern(s) to:

- i. be investigated internally;
- ii. be referred to the Local Authority's Designated Officer (LADO)
- iii. be referred to the police;
- iv. be referred to the external auditor;
- v. form the subject of an independent inquiry.

Headteachers should have a working knowledge and understanding of other Trust and school policies and procedures, e.g. grievance, disciplinary, harassment, child protection procedures, to ensure that concerns raised by colleagues are addressed via the appropriate procedure/process.

9.5. Stage Three

Within ten working days of a concern being received, the Headteacher receiving the concern (at paragraph 6.1 above) must write to the colleague:

- a) acknowledging that the concern has been received;
- b) indicating how they propose to deal with the matter;
- c) giving an estimate of how long it will take to provide a final response; and/or
- d) telling the colleague whether any initial enquiries have been made; and
- e) telling the colleague whether further investigations will take place, and if not why not; and/or
- f) letting the colleague know when they will receive further details if the situation is not yet resolved.

10. Outcome of the investigation

- 10.1. Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether or not a referral is required to an external organisation, such as the local authority or police.
- 10.2. They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.
- 10.3. Beyond the immediate actions, the CEO, Trustees and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.
- 10.4. Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

11. Raising Concerns Outside the School and Trust

- 11.1. The aim of this policy is to provide an internal mechanism for reporting, investigation and remedying any wrongdoing in the workplace. In most cases the colleague should not find it necessary to alert anyone externally. The law recognises that in some circumstances it may be appropriate for the colleague to report their concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. Colleagues are strongly encouraged to seek advice before reporting a concern to anyone external (outside of the school setting and the Trust). If a colleague is not satisfied with the Board of Trustees' response, the Headteacher should ensure that they are made aware with whom they may raise the matter externally, via:
 - a) 'Protect (previously Public Concern at Work)': telephone 0203 117 2520 (see para. 11.3 below);
 - b) A recognised Trade Union;
 - c) Department for Education (DfE)
 - d) a senior Officer of the Local Authority;
 - e) an External Auditor;
 - f) relevant professional bodies or regulatory organisations;
 - g) a Solicitor.
- 11.2. A further list of prescribed bodies to whom staff can raise concerns with is included [here](#).
- 11.3. The Headteacher should stress to the colleague that if they choose to take a concern outside the School or Trust, it is the colleague's responsibility to ensure that confidential information is not disclosed, i.e. confidential information, in whatever format, is not handed over to a third party.

- 11.4. **Protect** is a registered charity that colleagues can contact for advice to assist them in raising concerns about poor practice at work. The charity also provides advice to employers as to the possible ways to address these concerns. It also provides:
- a) [Further guidance](#) on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure
 - b) A free and confidential [advice line](#)
- 11.5. Concerns about safeguarding practices can be raised externally with the Local Authority Designated Officer (LADO) or by using the NSPCC Whistleblowing helpline. Employees can call 0800 028 0285 or email help@nspcc.org. There is further procedural information within the Trust Safeguarding and Child Protection Policy as well as with the Department for Education's publication 'Keeping Children Safe in Education'.

12. Monitoring and Review

- 12.1. Records of whistleblowing concerns and how they were addressed will be retained securely and in line with data protection and safeguarding requirements.
- 12.2. The Board of Trustees will be responsible for monitoring the implementation and effectiveness of this policy and procedure with delegated operational function passed to the Trust's Executive Group. The policy is prepared in conjunction with model policies obtained from EPM and The Key for School Leaders.
- 12.3. The policy and procedure will be reviewed by the Board of Trustees at least every three years and more frequently as necessary.

13. Version History

VERSION	ACTION	RESPONSIBLE	DATE
1.0	Draft PKAT Policy created adapting EPM model policy and legacy policies of the five founding schools of PKAT.	Matthew DEERE	23/05/2018
2.1	Policy reviewed and updated cross-referenced to the latest EPM model policy (August 2018)	Matthew DEERE	28/05/2021
2.2	Policy reviewed as part of review cycle	Matthew DEERE	30/09/2022
2.3	Policy reviewed as part of review cycle	Sarah BYFORD	29/07/2024
3.0	Policy reviewed and updated to meet statutory updates	Sarah BYFORD	01/10/2025
3.1	Policy reviewed and updated to meet statutory updates in respect of Sexual Harassment duties.	Sarah BYFORD	13/05/2026

