



Whistleblowing Policy

A Woodbridge Trust Policy

**This policy will be reviewed in the light of any legislative changes – Reviewed
April 2026**

Version Control

Current version	Previous version	Summary of changes made
1 st April 26	Oct 2018	From 6 April 2026 , sexual harassment will be a protected whistle-blowing disclosure under the Employment Rights Act 2025 .

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1 Introduction

- 1.1 Woodbridge Trust is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees and others that we deal with who have serious concerns about any aspect of the Trust's work, or those who work for the Trust, to come forward and voice those concerns.
- 1.2 This policy document explains how people can raise concerns, or whistleblow, without fear of victimisation, subsequent discrimination or disadvantage.

2 Aims

- 2.1 This policy aims to:
 - 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
 - Let all staff in the trust know how to raise concerns about potential wrongdoing in or by the trust
 - Set clear procedures for how the trust will respond to such concerns, ensuring that staff know that concerns raised by whistle-blowers will be responded to properly, fairly and confidentially.
 - Let all staff know the protection available to them if they raise a whistle-blowing concern
 - Assure staff that they will not be 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 – see section 6 below)
 - Ensure staff know that they are protected by law and that a non-disclosure agreement, confidentiality clause or 'gagging clause' in a settlement agreement or employment contract cannot stop them from making a protected disclosure in the public interest
- 2.2 This policy does not form part of any employee's contract of employment and may be amended at any time.
- 2.3 This policy applies to all employees, officers and trustees. Other workers, including consultants, contractors, agency staff and those on work placements, are also encouraged to use it.

3 Scope and Definition

3.1 The Whistleblowing Policy describes how individuals may make a disclosure when they have reasonable grounds to believe there is illegal, immoral, irregular, dangerous or unethical activity occurring under the Trust's control, where reporting those concerns is "in the public interest". Examples of whistle-blowing include (but are not limited to):

3.2 For example:

- health and safety risks, including risks to the public as well as employees and pupils
- sexual or physical abuse of pupils
- damage to the environment
- the unauthorised use of public funds
- breaches of financial management procedures
- Criminal offences, such as fraud or corruption
- Failure to comply with a legal obligation or statutory requirement
- Sexual harassment (in effect from 6 April 2026)
- Attempts to cover up the above, or any other wrongdoing in the public interest
- other unethical conduct

3.3 A whistle-blower is a person who raises a genuine concern relating to the above. The Whistleblowing Policy specifically covers those matters where it is in the public interest for an individual to raise concerns. Matters that relate to an individual's own employment must be raised through the grievance procedure. Issues about service quality should be made through the Trust complaints procedure.

3.4 When staff have a concern, they should consider whether it would be better to follow our staff grievance or complaints procedures.

Further impartial advice and guidance on whether you should follow the Whistleblowing or Grievance procedure can be sought via your Trade Union or Protect (formerly Public Concern at Work) via the links below:

- [Further guidance](#) from Protect on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure
- A free and confidential [advice line](#)

3.5 If a complaint involves personal circumstances alongside wider concerns (e.g. pupil health and safety), the staff member should consult with the Trust Head of People to decide the most appropriate reporting procedure.

3.6 The policy applies to all employees, volunteers and those contractors working for the academy on academy premises, for example, Trustees, agency staff, builders. It also covers suppliers and those providing services under a contract with the academy in their own premises.

4 Woodbridge Trust's comments

4.1 Under the terms of this policy the academy gives an assurance that:

- those who raise a concern will be listened to and heard
- employees who raise concerns within the scope of this policy will be protected from any detriment to their employment for doing so, in accordance with the law
- concerns will be thoroughly investigated
- appropriate actions will be taken in a timely manner when deemed necessary
- feedback will be provided to the whistleblower

5 Safeguards; confidentiality and witness protection

5.1 Woodbridge Trust recognises that the decision to report a concern can be a difficult one to make. All concerns will be treated, as far as possible, in the strictest confidence and every effort will be made not to reveal the whistleblower's identity if they so wish. However, if concerns require any further action, the individual may at some future date have to act as a witness in proceedings.

5.2 Woodbridge Trust will not tolerate or allow any form of harassment, victimisation or discrimination (including informal pressures) against those who whistleblow and will take appropriate action to protect individuals who raise a concern. If there are any intimidatory threats or instances of harassment, victimisation or discrimination against a whistleblower the academy will take appropriate action against the individual(s) concerned.

5.3 If an allegation is not confirmed by the investigation no action will be taken against the person that raised the issue. Action may, however, be taken against those who have been found to have made allegations frivolously, maliciously or for personal gain.

6 How to raise an issue by whistleblowing

6.1 Concerns should be raised at the earliest opportunity

6.2 As a first step, you should normally raise concerns with the Head of School or Service informally. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that the Head of School or Service is involved, you should approach the CEO in the first instance who may, depending on the circumstances, have to liaise with the Chair of Trustees and the Head of People.

6.3 Central team staff should report their concern to the CEO. If the concern is about the CEO, or it is believed they may be involved in the wrongdoing in some way, the central team staff should report the concern to the chair of trustees or Head of People.

- 6.4 Where a whistleblower has raised concerns informally and they are not satisfied with the outcome, or where they feel concerns are too serious to be managed at an informal stage, concerns should be lodged in writing where possible, using the form provided in Appendix A. They should include the names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter. Verbal reports should provide the same information requested on the form. Although whistleblowers are not expected to prove beyond doubt the truth of an allegation, they will need to demonstrate that there are reasonable grounds for concern
- 6.5 Staff are encouraged to give their name when reporting an allegation, to help the trust take the investigation further. However, a complainant's right to anonymity will be respected.
- 6.6 Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Trust. A full and proper investigation may be more difficult or impossible if further information cannot be obtained from the staff member. This will also make it more difficult to establish whether any allegations are credible.
- 6.7 Staff who are concerned about possible reprisals if their identity is revealed should consult with the Head of People or 1 of the contact points listed in section 6.2, 6.3 and appropriate measures can be taken to protect confidentiality where possible.

7 How Woodbridge Trust will respond

- 7.1 Woodbridge Trust will respond to all concerns raised under the terms of this policy.
- 7.2 When a concern is received by the head of school / CEO / trustee / other named person] – referred to from here as the 'recipient' – they will:
- Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative
 - Get as much detail as possible about the concern at this meeting and record the information. If it becomes apparent that the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure
 - Reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken (see 5.3 of this policy)
- 7.3 Where it is established that there is sufficient cause for concern a full investigation into the matter will be arranged, this may be conducted by / involve:

- The Head of school/CEO/Chair of Trustees/Head of People or other senior member of staff from the School or Trust.
 - In some cases, the Trust may bring in an external, independent body to investigate, such as external audit, external HR service.
 - Depending on the severity and whether it is believed a criminal offence may have been committed, the Trust may need to report the matter to the police
- 7.4 The person who raised the concern will be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps
- 7.5 Within 10 working days – excluding periods of trust/school closure – of a concern being received by the recipient, they will write to the complainant to:
- Acknowledge that the concern has been received
 - Indicate how the matter is to be dealt with
 - Give an estimate of how long it will take to provide a final response, informing the complainant as to whether any initial enquiries have been made
 - Tell the staff member whether further investigations will take place and if not, why not.
- 7.6 Throughout any investigation, the trust will provide wellbeing check-ins for both the complainant and the subject(s) of a concern. Where appropriate, support and signposting to manage expectations, protect emotional wellbeing and maintain professional confidence will be offered.

8 Outcome of the investigation

- 8.1 Once the investigation 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 (LA) or police.
- 8.2 Where further investigation is required this may involve:
- a detailed internal investigation by appropriate management representatives and professionals, with reference to the disciplinary policy if appropriate
 - referral of the matter to the police
 - referral to the external auditor
 - an independent inquiry
- 8.3 Concerns or allegations which fall within the scope of specific procedures (for example, child protection, adult abuse, or discrimination issues) will normally be referred for consideration under these procedures.

- 8.4 The person who raised the concern will be informed of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.
- 8.5 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.
- 8.6 While we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.
- 8.7 If a staff member is not satisfied with the way in which their concern has been handled, they can raise their concerns with The Head of school/CEO/Chair of Trustees/Head of People or other senior member of staff from the Trust who has not previously been involved in the investigation. In situations where all those listed have either been implicated or involved in the original investigation, the Head of People should be notified and an independent advisor will be brought in to review the investigation.

9 Malicious or vexatious allegations

- 9.1 Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made with the reasonable belief that the disclosure is in the public interest and meets the definition of whistle-blowing as listed in section 3, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern.
- 9.2 If, however, an allegation is shown to be deliberately invented or malicious, the trust will consider whether any disciplinary action is appropriate against the person making the allegation.

10 Help and support in raising an issue

- 10.1 Woodbridge Trust is committed to supporting those who escalate a concern under this policy.
- 10.2 Further advice and guidance for staff is available on a confidential basis from the Academy's HR service. Employees who are members of a trade union are also encouraged to discuss the matter with their trade union representative in the first instance.

11 How the matter can be taken further

- 11.1 This policy is intended to provide you with an avenue within the Trust to raise concerns. The Trust hopes you will be satisfied with any action taken. If you are not, and if you feel it is right to take the matter outside the academy, the following are possible contact points, this list is not exhaustive;
- The Director of Children's Services

- The Health and Safety Executive
- The Financial Services Authority
- H M Customs and Excise
- The Inland Revenue
- The Police
- The District Auditor
- The Ombudsman

11.2 If you do take the matter outside the academy, you should ensure that you do not disclose confidential information. Check with the service or school specific HR before disclosing any information.

12 The responsible officer

12.1 The Executive Head of Woodbridge Academy Trust has overall responsibility for the maintenance and operation of this policy. In the case of individual school the responsibility is delegated to the Head of School or Service who will ensure that the Executive Head is made aware and fully informed of the situation. They will maintain a record of concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report as necessary to the Trust.

APPENDIX A

Identify concerns or issues

Your Contact Details			
Name			
Address	Line 1		Line 2
	Line 3	Town or City	Postcode
Telephone	Home	Work	Mobile

Concerns	
Please provide details of your concerns. Continue on a separate sheet if necessary.	
What concern(s) do you wish to raise?	
Why are you concerned about the issue(s)?	
Have you discussed the issue(s) with anyone else? Yes ☐ No ☐	
If so, who with?	What date did you discuss this?
What was the outcome of this discussion?	

Signed	Date
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APPENDIX B

Steps in making a disclosure

