

# Whistleblowing Policy

**Adopted by:** Board of Trustees  
**Date:** March 2026  
**Date of Next Review:** March 2027

PROTECTION PARTNERSHIP  
ACCOUNTABILITY  
CARE SAFEGUARDING EMPOWER  
STRENGTHEN IMPROVE  
ENABLE EVERYONE VULNERABLE  
RESPONSIBILITY

## OUR VALUES

|            |                                                                                                    |
|------------|----------------------------------------------------------------------------------------------------|
| AMBITION   | We instil a lifelong love of learning and nurture skills and talents.                              |
| INCLUSION  | We welcome and respect people from all backgrounds, valuing and celebrating diversity.             |
| ASPIRATION | We want people to be the best they can be, and for everyone to achieve their potential.            |
| COMMUNITY  | We develop local and global citizens for the future, always committed to working in partnership.   |
| BELIEF     | We encourage everyone to believe in themselves and their future, providing opportunities to excel. |

AMBITION

INCLUSION

ASPIRATION

COMMUNITY

BELIEF

## Our Vision

Our vision is to make sure all students get the best educational experience. This means that alongside our broad and aspirational curriculum, we offer students diverse enrichment opportunities to help them find their passions.

It's important to us that students grow both academically and personally. To do this, we create safe, inclusive and enriched learning environments in our schools, with opportunities outside of the classroom that open up pathways to successful futures.

We respect each school's individuality and the communities you serve, so we'll work with you to support your development without changing your identity. Our network of schools collaborate and share knowledge to provide exceptional learning experiences and more opportunities for students to find what they love, and what they're good at.

## Our Aims

Our aim is to ensure that all schools within the Trust aspire to be strong providers and aim for exemplary practice through creative approaches.

## Our Future

We strive for continuous improvement and development. Our expansion will create and nurture a strong partnership of schools, covering both primary and secondary phases. Simply put, we believe that we are better, together. Working collaboratively allows us to build on each school's strengths, while supporting areas of improvement.

## Our Governance

We have five members who hold the board of trustees to account for the performance of the trust. In addition to the trust board, each member school has its own local governing body.

## Contents

|                                               | Page |
|-----------------------------------------------|------|
| 1 Introduction                                | 4    |
| 2 When might the Whistleblowing Policy apply? | 4    |
| 3 What actions should the Whistleblower take? | 5    |
| 4 How will the matter be progressed?          | 5-6  |
| 5 Respecting Confidentiality                  | 6    |
| 6 Raising unfounded malicious concerns        | 6    |
| 7 Conclusion                                  | 6    |

- 1.1 The staff and trustees of the Achieve and Learn Trust seek to run all aspects of school business and activity with full regard for high standards of conduct and integrity. In the event that members of school staff, parents, trustees, governors or the school community at large become aware of activities which give cause for concern, The Achieve and Learn Trust has established the following Whistleblowing Policy, which acts as a framework to allow concerns to be raised confidentially and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion.
- 1.2 Throughout this policy, the term *whistleblower* denotes the person raising the concern or making the complaint. It is not meant in a pejorative sense and is entirely consistent with the terminology used by Lord Nolan as recommended in the *Second Report of the Committee on Standards in Public Life: Local Spending Bodies* published in May 1996.
- 1.3 The Achieve and Learn Trust is committed to tackling fraud and other forms of malpractice and treats these issues seriously. The Achieve and Learn Trust recognises that some concerns may be extremely sensitive and has therefore developed a system which allows for the confidential raising of concerns within its schools' environment but also has recourse to an external party outside the management structure of the school.
- 1.4 The Achieve and Learn Trust is committed to creating a climate of trust and openness so that a person who has a genuine concern or suspicion can raise the matter with full confidence that the matter will be appropriately considered and resolved.
- 1.5 The provisions of this policy apply to matters of suspected fraud and impropriety and not matters of more general grievance which would be dealt with under the school grievance procedure.

The type of activity or behaviour which the Achieve and Learn Trust considers should be dealt with under this policy includes:

- manipulation of accounting records and finances
- inappropriate use of school assets or funds
- decision-making for personal gain
- any criminal activity
- abuse of position
- fraud and deceit
- serious breaches of school procedures which may advantage a particular party (for example tampering with tender documentation, failure to register a personal interest)
- other activities of a broadly similar nature.

## What actions should the Whistleblower take?

- 3.1 The Achieve and Learn Trust encourages the *whistleblower* to raise the matter internally in the first instance to allow those school staff and governors in positions of responsibility and authority the opportunity to right the wrong and give an explanation for the behaviour or activity.
- 3.2 The Achieve and Learn Trust has designated a number of individuals across its schools, to specifically deal with such matters and the *whistleblower* is invited to decide which of those individuals would be the most appropriate person to deal with the matter.

### Position

- Headteacher
  - Deputy Headteacher
  - Chair of Governors
  - Business Manager
- 3.3 The *whistleblower* may prefer to raise the matter in person, by telephone or in written form marked private and confidential and addressed to one of the above-named individuals. All matters will be treated in strict confidence and anonymity will be respected wherever possible.
  - 3.4 Alternatively if the *whistleblower* considers the matter too serious or sensitive to raise within the internal environment of the school, or if the concern is directly with regard to the Headteacher, the matter should be directed in the first instance to the CEO or Chair of the Trust Board.

## How will the matter be progressed?

- 4.1 The individual(s) in receipt of the information or allegation [the investigating officer(s)] will carry out a preliminary investigation. This will seek to establish the facts of the matter and assess whether the concern has foundation and can be resolved internally. The initial assessment may identify the need to involve third parties to provide further information, advice or assistance, for example involvement of other members of school staff, legal or personnel advisors, the police, the Department for Education and Employment, the Council.
- 4.2 Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer(s), possibly in conjunction with the Governing Body, will consider how best to report the findings and what corrective action needs to be taken. This may include some form of disciplinary action or third-party referral such as the police.

- 4.3 The *whistleblower* will be informed of the results of the investigation and the action taken to address the matter. Depending on the nature of the concern or allegation and whether or not it has been substantiated, the matter will be reported to the Governing Body and the Trust Board.
- 4.4 If the *whistleblower* is dissatisfied with the conduct of the investigation or resolution of the matter or has genuine concerns that the matter has not been handled appropriately, the concerns should be raised with the investigating officer(s), the Governing Body and/or the Trust Board.

## 5

### Respecting Confidentiality

---

Wherever possible the Achieve and Learn Trust seeks to respect the confidentiality and anonymity of the *whistleblower* and will as far as possible, protect him/her from reprisals. The Achieve and Learn Trust will not tolerate any attempt to victimise the *whistleblower* or attempts to prevent concerns being raised and will consider any necessary disciplinary or corrective action appropriate to the circumstances.

## 6

### Raising unfounded malicious concerns

---

Individuals are encouraged to come forward in good faith with genuine concerns with the knowledge they will be taken seriously. If individuals raise malicious unfounded concerns or attempt to make mischief, this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances.

## 7

### Conclusion

---

Existing good practice within the Achieve and Learn Trust in terms of its systems of internal control both financial and non-financial and the external regulatory environment in which the school operates ensure that cases of suspected fraud or impropriety very rarely occur. This Whistleblowing Policy is provided as a reference document to establish a framework within which issues can be raised confidentially internally and if necessary, outside the management structure of the school. This document is a public commitment that concerns are taken seriously and will be actioned.