

# HORIZONS EDUCATION TRUST

## Whistleblowing Policy

April 2026

### POLICY ISSUE CONTROL

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<b>July 2025</b>	<b>Full policy re-write.</b>
<b>April 2026</b>	<p>Updated in line with April 2026 employment law and best practice guidance.</p> <p>Section 1.1 final bullet point changed to 'Ensure staff understand that they are protected by law when making a protected disclosure, and that a non-disclosure agreement (NDA), confidentiality clause or 'gagging clause' in a settlement agreement or employment contract cannot prevent them from raising a concern in the public interest'.</p> <p>Section 1.1, bullet point added, 'Promote a culture of openness, transparency and accountability within the trust'.</p> <p>Section 3.1, bullet point added 'Sexual harassment'.</p> <p>Section 4.3, added 'Staff are encouraged to provide their name when raising a concern, as this will help the trust to investigate the matter more effectively. However, concerns may be raised anonymously.</p> <p>Where a concern is raised anonymously, it may be more difficult to investigate and establish whether any allegations are credible. The trust will consider anonymous concerns at its discretion.</p> <p>Staff who are concerned about possible reprisals if their identity is revealed should discuss this with the recipient of the concern or another appropriate contact. The trust will take all reasonable steps to protect the confidentiality of individuals raising concerns.'</p> <p>Section 5.1, added 'Acknowledge receipt of the concern and provide an indication of how the matter will be handled, including an estimated timeframe for feedback'.</p> <p>Section 5.1, added 'Throughout any investigation, the trust will consider the wellbeing of both the individual raising the concern and any individuals subject to the concern, and will offer appropriate support where necessary.'</p> <p>Section 5.2.5 added, 'If the person raising the concern is not satisfied with the way in which their concern has been handled, they may raise this with one of the alternative contacts listed in section 4.2.'</p> <p>Section 8 added, 'LINKS WITH OTHER POLICIES</p> <p>8.1 This policy should be read in conjunction with the following trust policies and procedures:</p> <ul style="list-style-type: none"> <li>• Grievance policy</li> <li>• Complaints policy</li> <li>• Child protection and safeguarding policy</li> <li>• Disciplinary policy'</li> </ul>

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## **1.0 AIMS**

1.1 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
- Let all staff know the protection available to them if they raise a whistle-blowing concern
- Ensure staff understand that they are protected by law when making a protected disclosure, and that a non-disclosure agreement (NDA), confidentiality clause or 'gagging clause' in a settlement agreement or employment contract cannot prevent them from raising a concern in the public interest
- Promote a culture of openness, transparency and accountability within the trust

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

## **2.0 LEGISLATION**

2.1 The requirement to have clear whistle-blowing procedures in place is set out in the Academy Trust Handbook.

2.2 This policy has been written in line with the above document, as well as government guidance on whistle-blowing. We also take into account the Public Interest Disclosure Act 1998.

2.3 This policy complies with our funding agreement and articles of association.

## **3.0 DEFINITION OF WHISTLE-BLOWING**

3.1 Whistle-blowing covers concerns made that report wrongdoing that is "in the public interest". Examples of whistle-blowing include (but are not limited to):

- Criminal offences, such as fraud or corruption
- Pupils' or staff health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Sexual harassment
- Breaches of financial management procedures
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment

3.2 A whistle-blower is a person who raises a genuine concern relating to the above. Not all concerns about the trust, or individual schools in the trust, count as whistle-blowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistle-blowing. If something affects a staff

member as an individual, or relates to an individual employment contract, this is likely a grievance.

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

3.3 **Protect** (formerly Public Concern at Work) has:

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

## 4.0 PROCEDURE FOR STAFF TO RAISE A WHISTLE-BLOWING CONCERN

### 4.1 When to raise a concern

Staff should consider the examples in section 3 when deciding whether their concern is of a whistle-blowing nature. Consider whether the incident(s) was illegal, breached statutory or trust procedures, put people in danger or was an attempt to cover any such activity up.

### 4.2 Who to report to

Academy-based staff should report their concern to the **headteacher**. If the concern is about the headteacher, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the **Director of Education**.

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**.

### 4.3 How to raise the concern

Concerns should be made in writing wherever possible. They should include 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.

Staff are encouraged to provide their name when raising a concern, as this will help the trust to investigate the matter more effectively. However, concerns may be raised anonymously.

Where a concern is raised anonymously, it may be more difficult to investigate and establish whether any allegations are credible. The trust will consider anonymous concerns at its discretion.

Staff who are concerned about possible reprisals if their identity is revealed should discuss this with the recipient of the concern or another appropriate contact. The trust will take all reasonable steps to protect the confidentiality of individuals raising concerns.

## 5.0 TRUST PROCEDURE FOR RESPONDING TO A WHISTLE-BLOWING CONCERN

### 5.1 Investigating the concern

When a concern is received – 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 the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure**
- Acknowledge receipt of the concern and provide an indication of how the matter will be handled, including an estimated timeframe for feedback
- 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 section 6 of this policy)
- Establish whether there is sufficient cause for concern to warrant further investigation. If there is:
  - The recipient should then arrange a further investigation into the matter, involving the CEO and/or Chair of Trustees, if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In others, they may need to report the matter to the police
  - The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps
  - Throughout any investigation, the trust will consider the wellbeing of both the individual raising the concern and any individuals subject to the concern, and will offer appropriate support where necessary.

### 5.2 Outcome of the investigation

- 5.2.1 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.
- 5.2.2 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.
- 5.2.3 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.
- 5.2.4 Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

5.2.5 If the person raising the concern is not satisfied with the way in which their concern has been handled, they may raise this with one of the alternative contacts listed in section 4.2.

## **6.0 MALICIOUS OR VEXATIOUS ALLEGATIONS**

6.1 Staff are encouraged to raise concerns when they believe there to potentially 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 member of staff who raised the concern.

6.2 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.

## **7.0 ESCALATING CONCERNS BEYOND THE TRUST**

7.1 The trust encourages staff to raise their concerns internally, in line with section 4 of this policy, but recognises that staff may feel the need to report concerns to an external body. A list of prescribed bodies to whom staff can raise concerns with is included [here](#).

7.2 The Protect advice line, linked to in section 3 of this policy, can also help staff when deciding whether to raise the concern to an external party.

## **8.0 LINKS WITH OTHER POLICIES**

8.1 This policy should be read in conjunction with the following trust policies and procedures:

- Grievance policy
- Complaints policy
- Child protection and safeguarding policy
- Disciplinary policy