



# Whistleblowing Policy

## Policy details

- Approved by Trust Board - 17/09/2024
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- Policy owner: Chief Relationships and Engagement Officer

(Minor updates to relevant contact details made on 26 January 2026).

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## 1. Introduction

- 1.1. Our Trust is committed to the highest standards of quality, probity, openness and accountability. This policy covers all categories of worker, including employees, workers, agency workers, consultants, contractors, casual staff and volunteers.
- 1.2. As part of that commitment, we encourage those who work with us or others with concerns about any aspect of our work to come forward and express those concerns. In most cases, concerns or complaints will be dealt with through normal procedures, such as mechanisms for resolving grievances, disciplinary matters, concerns relating to equal opportunities, or low level safeguarding concerns (see Managing Safeguarding Concerns and Allegations Against Staff Policy). [For more details see here.](#)
- 1.3. In most cases, you should be able to raise any workplace concerns with your line manager, Headteacher, Executive Headteacher/Regional Director (if the concerns relate to your Headteacher), or the CEO (if the concerns relate to your Regional Director or any other member of our Trust's SLT).
- 1.4. However, in some cases, we recognise that individuals will need to come forward with a matter that is outside of normal procedures under the Public Interest Disclosure Act 1998. You should have confidence that you can do so, where the disclosure is made in good faith without fear of reprisal or victimisation.
- 1.5. Whistleblowing is a term used when a worker passes on information concerning wrongdoing – making a disclosure or “blowing the whistle”. The wrongdoing will typically, although not necessarily, be something they have witnessed or believe to be happening at work.
- 1.6. This policy covers “protected disclosures” where the worker reasonably believes they are acting in the public interest. It is not intended as recourse against financial or business decisions made by our Trust or an individual academy, and in most cases personal grievances (for example bullying, harassment, discrimination), including collective grievances, should be dealt with in accordance with the Grievance Procedure or Dignity at Work Policy.
- 1.7. To be protected by law under the Public Interest Disclosure Act, a worker must reasonably believe that the disclosure tends to show past,

present or likely future wrongdoing falling into one or more of the following categories:

- criminal activity / offence
- bribery, fraud or other financial impropriety / malpractice
- endangering someone's health and safety
- damage to the environment
- a miscarriage of justice
- the company is breaking the law, for example does not have the right insurance or
- you believe someone is covering up wrongdoing in the above categories

1.8. This Policy will be applied with due consideration to our Trust's Equality, Diversity and Inclusion Policy and our co-operative values.

## 2. Communication, Consultation and Information

2.1. Each academy is responsible for ensuring all colleagues are aware of the Whistleblowing Policy, where to find it on the Colleague Portal (and Trust Website), and who to contact (see Section 4, below, for contact details).

2.2. Through our Induction and Probationary Procedures for all colleagues (including volunteers, trustees and Community Council Members), we will make sure that you know how to recognise the problems, and that you understand the effects they may have on the organisation and the service we provide in relation to:

- fraud, corruption and malpractice (refer to Anti Fraud & Corruption Framework);
- abuse or neglect of vulnerable people, including child protection / safeguarding children (refer to academy Safeguarding Policy & Procedures);
- failure to deliver proper standards of service (refer to Capability or Disciplinary Procedures);
- damaging personal conflicts (refer to Grievance Procedure and Dignity at Work Policy); and
- bullying, discrimination, harassment or victimisation in the workplace (refer to Dignity at Work Policy).

*This list is for guidance only and is not intended to be comprehensive. Note: these are not necessarily whistleblowing matters, please see 1.7 above*

- 2.3. When we find a problem, we will always deal with it seriously. We will pursue fraud and serious abuse as vigorously as possible through our Disciplinary Procedure, or if necessary through courts; frauds are also always reported to the police. We hope that you will feel confident in coming forward, that we will share your sense of right and wrong, and act on what you tell us.

### 3. Confidential Reporting

- 3.1. We know that it is never easy to report a concern, particularly one that may relate to fraud or corruption. We urge you to come forward with any concerns at an early stage, and before problems have a chance to become serious.
- 3.2. If you prefer, we are happy for you to come forward with another colleague, a friend or trade union representative to report a concern.
- 3.3. We support concerned colleagues and that includes all trustees, community council members. We will protect everyone from reprisals or victimisation. If anyone comes forward with a concern, in good faith, they can be confident that this will not affect their position.
- 3.4. We will do our best to respect your confidentiality if you have requested this, although there may be circumstances that make it impossible to investigate fully without disclosing information that may indicate your concerns. You will be informed before such information, in particular your name, is shared.
- 3.5. Discouraging a colleague from expressing concerns, victimising someone who has done so, or raising a concern with malicious intent, may be treated in accordance with the Disciplinary Procedure.
- 3.6. At all times confidentiality must be respected by all parties. If the concerns raised are not proven then the individual against whom the allegation has been made is considered innocent and the matter must be dropped.

### 4. The Whistleblowing Process

- 4.1. If you are satisfied that your concern meets the criteria in paragraph 1.7 above, then it should be reported to Sarah Lay, Head of Governance and Company Secretary; this may be in writing: (headofgovernance@coopacademies.co.uk) or, initially, by telephone: 07879 487 266.

- 4.2. Exceptions to (4.1) above are that any concerns involving the Chief Relationships and Engagement Officer should be reported to our Trust's CEO, Chris Tomlinson, and any concerns involving our Trust's CEO should be reported to the Chair of the Trust Board, russell.gill@coop.co.uk.
- 4.3. When reporting a concern you must make it clear that you wish to report a matter under the Whistleblowing Policy and also indicate:
- your name and contact details\*
  - the nature of your concern
  - why you believe it comes under the Whistleblowing Policy
  - who you believe is or may be involved in any wrongdoing
  - (if applicable) what action, if any, you wish to see taken to deal with the matter
  - any other people who you believe may support their concern
  - who has already been informed of the matter and the outcome of this
  - whether you are prepared to meet with the person to whom you are reporting your concerns, to discuss the concerns further
  - whether, if necessary you would be prepared to give evidence to any subsequent investigation.

*\*you may, if you wish, report a concern without giving your name, however it may be difficult (or impossible) for this to be investigated further or for feedback on the outcome of your disclosure to be provided.*

- 4.4. Please note that our Trust's CEO will ensure that our Trust Board is made aware of the number and nature of whistleblowing concerns raised through this process, whilst maintaining the confidentiality of the individuals who raised the concerns.
- 4.5. When a matter is initially raised under the Whistleblowing Policy, it will be acknowledged. If you come to us with a concern, we will look into it thoroughly and as quickly as possible.
- 4.6. A preliminary assessment will take place to establish the basic facts of the situation prior to proceeding to a formal investigation, which may include meeting with you. This will help to 'sense-check' that whistleblowing is the most appropriate Trust policy under which to deal with the matter in the circumstances and to establish whether, on the face of the evidence available, there is a case to investigate further. Relevant member(s) of our Trust's central senior leadership team may be included by the Head of Governance and Company

Secretary in making the preliminary assessment. An update will be provided to you the complaint once this preliminary assessment has taken place.

- 4.7. If proceeding to a full investigation, we must take into account the well-being of all parties involved. Initially we will seek to gather evidence together to support or dispose of any allegation. However, we will also need to advise the person against whom the concerns have been raised and find out their side of the story.
- 4.8. We will try to let you know the timescale for our investigations, the results and about any action that is proposed. However, in doing this, we have to respect the confidentiality of other members of our Trust as well. If the investigation proves that there is a case to answer then our Trust's Disciplinary Procedure may be invoked, or, if necessary, referral will be made to the police.
- 4.9. The investigation will be led by someone appropriate in the circumstances, who may be an employee of our Trust or an external person. Details of the concerns raised and the investigation will not be shown or discussed beyond those who need to know. The only other people who may be informed are our Trust's CEO and the Chair of the Board. In certain circumstances the Chair may be obliged to initiate the investigation.
- 4.10. If you raise a concern, then you too should treat the matter as confidential, both during and after any investigation.
- 4.11. As far as confidentiality allows, investigators will keep you informed of the progress of the investigation and advise of the outcome of the investigation i.e. whether or not aspects of the complaint were upheld / any recommendations, or that action was taken to ensure a colleague's behaviour was not repeated, but not what sanction was applied.
- 4.12. If the whistleblower is not satisfied with the outcome of the internal investigation, our Trust recognises their right to pass the matter to an external body.
- 4.13. Trade Union members are advised to make also contact with an employed official of their Union.
- 4.14. If our policy and procedures are working properly, you should not need to contact an external agency to express concerns. But there may be exceptional or urgent circumstances where it might be best to

do this, and if you do so you will still be protected. It is not possible to give precise examples but, for instance, relevant situations might be:

- in the case of a criminal offence (contact the police);
- in the case of abuse of public funds, or other complaints about the regulation of our Trust (contact the Department for Education (DfE) which is responsible for regulating all academy trusts  
[https://form.education.gov.uk/service/Contact\\_the\\_Department\\_for\\_Education](https://form.education.gov.uk/service/Contact_the_Department_for_Education)
- in the case of any fraud (contact our Trust's external auditors RSM <https://www.rsmuk.com/>).

We hope that none of these will ever prove necessary.

- 4.15. You can also approach Protect (formerly known as Public Concern At Work) for confidential and independent advice. Further details are here: <https://protect-advice.org.uk> Tel: 0203 117 2520
- 4.16. The DfE may also be able to advise on a confidential basis if you are not sure who to contact about a particular problem. As regulators, they may need to follow up on any potential problems identified.

## 5. Concerns about a child/young person

- 5.1. All employees and volunteers in schools and academies must comply with the most recent version of 'Keeping children safe in education' (available on the DfE website), which includes taking action to protect a child who may be at risk of harm or in need of services, and to make appropriate referrals to children's social care. Any colleague should press for reconsideration if they believe a child is not being safeguarded.
- 5.2. This section should be read in conjunction with:
  - The academy's child protection and safeguarding policy and procedures;
  - Our Trust's Managing Safeguarding Concerns and Allegations Against Staff Policy;
  - The relevant Local Multi Agency Partnership arrangements;
  - Keeping children safe in education (DfE); and
  - What to do if you're worried a child is being abused (DfE 2015).
- 5.3. In the first instance, you should discuss any concerns about a child with the Designated Safeguarding Lead in your Academy. Action may already have been taken and/or the designated staff may have sought

advice from partner agencies such as children's social care or the police. If you are not satisfied with the outcome of this discussion, you should report your concerns to the Headteacher/Principal.

5.4. If you still have concerns about the safety or welfare of the child, you should contact at least one of the following:

- A Regional Child Protection and Safeguarding Lead:
  - Claire Dodd: [claire.dodd@coopacademies.co.uk](mailto:claire.dodd@coopacademies.co.uk)
  - Catherine McCarney:  
[catherine.mccarney@coopacademies.co.uk](mailto:catherine.mccarney@coopacademies.co.uk)
  
- Your Regional Director:
  - West Yorkshire: [karine.hendley@coopacademies.co.uk](mailto:karine.hendley@coopacademies.co.uk)
  - Greater Manchester (not including Salford):  
[brian.kelly@coopacademies.co.uk](mailto:brian.kelly@coopacademies.co.uk)
  - Merseyside and Salford:  
[stephen.brice@coopacademies.co.uk](mailto:stephen.brice@coopacademies.co.uk)
  - Staffordshire: [suzanne.oakes@coopacademies.co.uk](mailto:suzanne.oakes@coopacademies.co.uk)

5.5. If a child is in danger or at immediate risk of harm, anyone can make a referral to children's social care at their local authority. See your academy's Child Protection and Safeguarding Policy for your local arrangements / contact details. You should inform your Designated Safeguarding Lead as soon as possible that a referral has been made.

## 6. Concerns about a colleague/adult in school

6.1. This relates to concerns that a member of staff, volunteer or other adult in school may have harmed a child/ren or behaved in a way that suggests they may be unsuitable to work with children. In line with our Trust's Managing Safeguarding Concerns and Allegations Against Staff Policy, if you have concerns about the behaviour of another adult in school you should report this to your Headteacher in the first instance, unless the concern relates to that individual.

6.2. Concerns about the Designated Safeguarding Lead should be reported to the Headteacher.

6.3. If the allegation or concern relates to the Headteacher, or there is reason to believe that the Headteacher is not taking the appropriate action, or you do not believe your concerns are being taken seriously - you should contact your Regional Director (see 5.4 above) or the Chief People Officer, [helen.jackson@coopacademies.co.uk](mailto:helen.jackson@coopacademies.co.uk)

6.4. You may also decide to contact the relevant Local Authority Designated Officer (LADO). In exceptional circumstances, if a child has been or may be placed at immediate risk of harm, then the police should be contacted. Any professional with concerns about child protection or safeguarding can also contact the NSPCC whistleblowing helpline on 0800 028 0285.

## 7. Review

7.1. This policy will be reviewed every three years, or sooner if required, in consultation with our recognised trade unions.

## 8. Other useful links

8.1. Colleagues who are members of a Trade Union / other professional body will also be able to get advice and support in relation to whistleblowing from that organisation.

8.2. Protect (<https://protect-advice.org.uk/> Tel: 0203 117 2520) is a charity that provides support to staff that are considering – or need advice on – whistleblowing.

8.3. The NSPCC (0800 028 0285) can offer advice and support to professionals considering whistleblowing in relation to an organisation's child protection or safeguarding arrangements.

8.4. In certain circumstances colleagues may also whistleblow to Ofsted, the Department for Education (DfE) or Secretary of State for Education.

8.5. Raising concerns can be daunting. Colleagues employed by our Trust can access confidential support via our Employee Assistance Programme [here](#).