**Policy Document for:** **Whistleblowing**

Approved:

Due for Review: Autumn 2028

**Additions/amendments in this version**

| | |
|---|---|
| | *Change to name of Head for Bobbing* |
| *Sept 26* | *Changes in line with KCSIE 2026 – highlights in yellow* |

## Introduction

The staff and directors of the schools in the Bourne Alliance Trust seek to run all aspects of school business and activity with full regard for high standards of conduct. The Trust is committed to achieving the highest possible standards of probity and integrity regarding its practices. The Trust recognises that it is important for all Employees to have a means by which they can raise serious concerns about any aspect of the operation of the Trust.

The requirement to have clear whistle-blowing procedures in place is set out in the Academy Trust Handbook.
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. This policy complies with our funding agreement and articles of association.

The Trust encourages Employees to raise any concerns internally at the earliest opportunity rather than disregarding issues or raising the matter externally. The Trust will address concerns seriously and undertake as much investigation as is necessary given the circumstances – this may include referral to external agencies. The Trust will endeavour to advise an Employee of any actions / outcome arising from a complaint where appropriate.

The Trust will provide reasonable support to an Employee who raises a concern. The Trust will ensure that where a concern is raised, an Employee will be protected from detriment, harassment and victimisation. It is recognised that in certain cases it may be appropriate to consider concerns raised on a confidential or anonymous basis.

KCSIE 2026 requires all staff to read Part One of the guidance and to understand how to raise concerns about safeguarding practice, including concerns relating to sexual harassment, sexual violence, harmful sexual behaviour, online safety, and misogynistic or sexualised behaviour. This policy forms part of that safeguarding system

## Scope

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.

A whistle-blower is a person who raises a genuine concern relating to the above. Not all concerns about 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.

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

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
- 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)

## Appropriate circumstances for whistle blowing

Individuals are encouraged to come forward with genuine concerns, knowing that they will be taken seriously. The Whistleblowing Procedure provides a means for Employees to raise concerns about conduct or situations which they believe are inappropriate.

Whistle-blowing covers concerns made that report wrongdoing that is "in the public interest.

Staff must whistleblow if they observe, suspect or become aware of any of the following:

### Financial Misconduct, Fraud & Criminal Activity

- manipulation of accounting records or finances
- inappropriate use of school assets or funds
- gross mismanagement of funds
- decision-making for personal gain
- any criminal activity
- acts or potential acts of fraud, corruption or bribery
- misuse of public funds or resources
- a miscarriage of justice
- conduct which is, has been, or is likely to be an offence or breach of law
- conduct that has occurred, is occurring or is likely to occur which causes the Trust to fail to comply with a legal obligation
- suppressing information about any of the above

### Misuse of Position, Authority or School Procedures

- abuse of position
- serious misuse or abuse of authority
- serious breaches of school procedures which may advantage a particular party (e.g., tampering with tender documentation, failure to register a personal interest)
- unethical or unprofessional conduct that causes concern
- circulation of inappropriate emails
- concerns about any aspect of service provision
- dangerous practices
- damage to school property or the school environment

### Safeguarding & Child Protection Concerns (KCSIE 2026)

**Abuse & Failure to Safeguard**

- sexual, emotional or physical abuse of pupils or others
- concerns of a safeguarding or child protection nature
- failure to follow safeguarding procedures
- minimisation or dismissal of safeguarding concerns ("it's just banter", "boys being boys")
- failure to act in a child-centred way or failure to provide the right help at the right time

**Prevent Duty**

- failure to have due regard to the need to prevent people from being drawn into terrorism
- failure to report extremist content, violent ideology or radicalising influences

### Misogyny, Sexual Harassment & Harmful Sexual Behaviour (KCSIE 2026)

- sexualised behaviour, misogynistic language or misogynistic attitudes by staff
- failure to challenge inappropriate sexualised behaviour between children
- failure to follow Part Five procedures for sexual harassment, sexual violence or harmful sexual behaviour

- failure to report online sexual harm, including AI-generated sexual images
- failure to recognise misogyny or incel-linked content as a safeguarding concern

## Online Safety, Filtering & Monitoring (KCSIE 2026)

- failure to follow filtering & monitoring procedures
- failure to supervise pupil device use appropriately
- failure to report online harm, extremist content, misogynistic influencers or incel-linked content
- use of personal devices to photograph or communicate with pupils
- viewing, saving, deleting or forwarding harmful content (including deepfakes or manipulated images)
- engaging with pupils on personal social media or private messaging
- showing pupils inappropriate online content

## Professional Conduct & Boundary Concerns (Low-Level Concerns – KCSIE 2026)

**Inappropriate Relationships or Favouritism**

- being over-friendly with children
- having favourites
- giving gifts to individual pupils
- offering lifts to pupils without permission
- socialising with pupils outside school context

**Inappropriate Physical or One-to-One Contact**

- engaging with a child one-to-one in a secluded area or behind a closed door
- unnecessary physical contact
- restraining pupils inappropriately
- being alone with pupils in unmonitored spaces

**Inappropriate Communication or Language**

- using inappropriate sexualised, intimidating or offensive language
- speaking inappropriately or derogatorily about a child in earshot of pupils, parents, staff or external agencies
- humiliating, belittling or verbally abusing pupils (explicitly recognised as emotional abuse in KCSIE 2026)
- using humour that demeans or embarrasses pupils

**Online & Digital Misconduct**

- taking photographs of children on personal mobile phones
- contacting pupils privately (text, WhatsApp, DMs, social media)
- engaging with pupils on personal social media
- failing to follow guidance on generative AI, deepfakes or manipulated images

**Emotional Boundary Concerns**

- sharing personal problems or intimate details with pupils
- relying on pupils for emotional support
- creating dependency or special relationships
- showing distress or anger in ways that frighten pupils

**Professionalism & Respect**

- breaching confidentiality
- discussing safeguarding cases with people who do not need to know
- speaking negatively about colleagues, pupils or parents in public spaces
- behaving aggressively, sarcastically or disrespectfully towards pupils

## Serious Violence, Extremism & Harm (KCSIE 2026)

- failure to report indicators of serious violence
- failure to report pupils engaging with violent, extremist or misogynistic online content
- normalising violent language or threats

### Health & Safety

- past, current or likely health and safety risks
- failure to follow health and safety procedures
- unsafe working practices that place pupils or staff at risk

### Concealment

- deliberate concealment of information relating to any concerns listed above

A whistle blower should ask themselves a few questions about their concern before taking action:

- Is it in the public interest?
- Is it, or do you believe it to be, illegal?
- Is it a criminal offence?
- Is the environment damaged or likely to be damaged?
- Is it, or do you believe it to be, against codes of practice issued by the school, the local authority (LA), the DFE or a professional body?
- Does it contradict what the employee has been taught, or should have been taught?
- Is it about an individual's behaviour or is it about general working practices?
- Has the whistle blower witnessed the incident?
- Does it constitute the covering up of wrongdoing?
- Does it concern actions that negatively affect the welfare of children?

Employees may raise concerns about the practice of anyone who works for or on behalf the Trust including: all Employees, Governors, Volunteers or Contractors. Concerns that Employees have, may be raised individually or collectively. If collective concerns are raised staff should be prepared to give their own account during any investigation, should this be required.

There is no time limit for raising a concern – however Employees are encouraged to do so at the earliest opportunity since it may be difficult to address a matter if a significant time has elapsed.

## Responsibilities of the Trust

- To foster a culture where Employees can feel confident in raising concerns
- To ensure concerns are fully considered, investigated as necessary and action taken as appropriate
- To ensure that Employees raising concerns receive feedback on any action taken where appropriate
- To make Employees aware how they can take matters further if they are not satisfied
- To reassure Employees that they will be protected against detriment and reprisal should they raise a concern

KCSIE 2026 emphasises that whistleblowing is part of a whole-school safeguarding culture and supports early identification of harmful sexual behaviour, misogyny, online harm and unsafe practice.

## Responsibilities of the Employee

- To raise concerns only where there is a reasonable suspicion for doing so
- Not to knowingly raise a false allegation with malicious or vexatious intent
- To engage with internal / external actions to address any concerns – by attending meetings and / or participating in any investigation

KCSIE 2026 requires staff to report concerns about DSLs, Heads of School or safeguarding leadership if they believe safeguarding practice is unsafe, minimised or not compliant.

## 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.

This includes concerns relating to safeguarding culture, sexual harm, online safety failures, or failure to follow KCSIE 2026.

## Procedure for raising a concern – Stage 1

Wherever possible Employees should initially raise concerns openly with their line manager, the Head of School or CEO. In

instances of serious concern or where the complaint involves the line manager, the Head of School / CEO complaints may be raised with the Chair of Governors. Should the CEO have concerns – these should be raised with the Trust Board in the first instance. Please refer to Appendix A for the appropriate internal contacts.

Concerns may be raised verbally or in writing, but it is preferable for an allegation to be set out in writing. A concern raised in writing should:

- Set out the background and history of the concern - giving names, dates and places where possible
- Give the reason why the Employee is particularly concerned about the situation.
- The statement should be dated and signed.
- For clarity it would be helpful for the Employee to state that they wish their concerns to be addressed under the whistleblowing procedure

An Employee is not expected to prove the validity of their concern; however, they will need to demonstrate that there are sufficient and reasonable grounds for their concern. Further investigation may be hampered if there is only limited evidence to support the concern raised.

If the allegation is made orally, the employee can invite a friend or representative of a trade union/professional association to be present. It is also permissible for a trade union or professional association representative to raise the matter on your behalf. If you have raised the issue orally, you will be asked to put your concerns into writing, which you should date and sign.

If the concern relates to the DSL or safeguarding practice, staff should raise the concern directly with the Head of School, CEO or Chair of Trustees (depending on whom the concern has been raised about). See the **child protection and safeguarding** policy for more information.

## How the Trust will respond

Preliminary enquiries may be made to decide the appropriate course of action. This may necessitate further discussion with the Employee who has raised the concern. On occasion it may not be appropriate for the person who receives the complaint to progress the concern and the matter may be referred to another individual within the Trust or an external organisation. It may be possible to resolve some concerns informally by agreed action without the need for further formal investigation. Where it is not possible to resolve the matter informally, the action taken by the Trust will depend on the nature of the concern and may include:

- Undertaking an internal management or disciplinary investigation
- Referral to the Trust's auditor / another regulatory authority / the Police / the Local Authority

Within 10 working days of receipt of any concern, the person progressing the matter will write to the Employee with an initial response to:

- Acknowledge that the concern has been received
- Indicate how and through whom the Trust proposes to address the matter including whether further investigation or referral to another organisation will be made
- Give an estimate of how long the investigation will take
- Indicate whether further information will be sought from the employee and the arrangements for obtaining this where known

The form of further contact between the employee and the person progressing the complaint will depend on the nature of the matter raised and the follow up action required. In instances where an investigation is prolonged or referral to an external agency takes place – arrangements will be made to provide the employee with situational updates as far as is practicable.

On occasion the person considering the complaint may determine that it is not appropriate for further action to be taken. This may include where:

- There is no evidence that malpractice has occurred
- The matter is / has been the subject of internal proceedings under another Trust policy
- The matter is / has been the subject of external legal proceedings / been referred to another external agency
- A false and malicious or vexatious complaint has been made

### Notification of the Outcome of the Concern

The Trust recognises that an employee raising a concern would wish to be assured that the matter has been fully addressed.

Feedback will be provided on the outcome of the complaint, wherever possible. In some circumstances however it may not be appropriate or permissible to share this information (for example where legal / disciplinary or regulatory authority action is pending or if sharing information may infringe the duty of confidence owed to a third party). Where it is not appropriate to provide detailed feedback the employee will be advised that the matter has been addressed or concluded as far as is practicable. Where a matter is not to be considered further the employee who raised the complaint will be advised of this in writing.

## Malicious or vexatious allegations

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.

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.

## Escalating concerns beyond the trust

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.

The Protect advice line, as detailed earlier in the policy, can also help staff when deciding whether to raise the concern to an external party.

## How the matter may be taken further

### Stage 2

- If you are dissatisfied with the trust's response, you can raise the matter within 10 working days of the date of the trust's response by writing to the Chair of the Trust Board.
- The Chair of the Trust Board will then write to you within five working days of receiving the letter to arrange a meeting to discuss the continuing concerns and why you are dissatisfied with stage 1. This meeting should take place promptly. Again, you may be accompanied by a friend or representative of your trade union/professional association.
- The Chair of the Trust Board may then decide to investigate further and will need to decide what action to take. You will be updated with the outcome of the meeting within five working days.

This procedure is intended to provide employees with a mechanism to raise concerns internally within the Trust.
Should this process be exhausted and the employee feels that matters have not been fully / appropriately addressed or that concerns are ongoing they may wish to raise the matter outside of the Trust.

### Stage 3

- If you are dissatisfied with the outcome of stage 2, you may opt to take the matter to stage 3, by raising the matter externally within 10 working days of the date of the decision letter at stage 2, with any of the prescribed people or bodies recommended in the government publication 'Blowing the whistle to a prescribed person: a list of prescribed people and bodies' available from https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/510962/BIS-16-79-blowing-the-whistle-to-a-prescribed-person.pdf

An employee who intends to raise a concern externally is encouraged to consider carefully whether this is the most appropriate form of action to resolve the issue and whether all reasonable internal steps have been taken.

If a matter is raised outside of the Trust, an employee should take all reasonable steps to ensure that confidential or privileged information is not disclosed.

## Allegations against the CEO

If an employee is concerned that the CEO is the wrongdoer or involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigation, this should be reported to the Chair of the Trust Board. The directors may investigate the allegation themselves in the first instance but may take legal advice from the trust's legal

partners where appropriate. If the employee feels that the directors have not dealt appropriately with the issue, then he/she has the option of contacting one of the prescribed persons as in stage 3 above or one of the following government departments as appropriate:

- HM Revenue and Customs
- The Financial Conduct Authority
- The Office of Fair Trading
- The Health and Safety Executive
- The Environment Agency
- The Director of Public Prosecutions
- The Serious Fraud Office
- The Education and Skills Funding Agency
- The Department for Education
- The National College for Teaching and Leadership

## Protection and Support for Employees

The Trust will take reasonable measures to support and protect employees who raise concerns. Employees raising a concern with reasonable suspicion for doing so will not be subject to discrimination, harassment or victimisation. Should an employee believe they have been subject to detriment or retribution they should report this to the Chair of the Trust Board who may address the matter in accordance with the Trust's disciplinary procedure.

Employees are protected by law from dismissal, harassment, bullying or other detriment by the trust or other members of staff with whom they work. If this occurs, the employee has the right to take their case to an employment tribunal.

No action will be taken against an Employee where concerns raised are subsequently unproven. However, if any individual raises malicious unfounded concerns or attempts 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. The CEO will consider whether any disciplinary action is appropriate against the individual who made it. Should an employee commit a criminal offence in raising a concern (e.g. accepting a bribe or an act of corruption) – protection from detriment may be lost and the employee may be subject to the Trust's disciplinary procedures. The police may be asked to consider whether any action might be appropriate against the person responsible, even if s/he was not a pupil or employee.

## Confidentiality

The best way to raise a concern is to do so openly. Openness makes it easier for the Trust to assess and investigate the issue. However, it is recognised that there may be some circumstances where an employee would prefer to raise a concern in confidence. Employees should make the Trust aware of this when raising their concern.
Where appropriate every effort and consideration will be given to arrangements to maintain the Employee's confidentiality. Every effort will be made not to reveal the Employee's identity, without their prior consent, if this is their wish.
However, in certain cases, it may not be possible to maintain confidentiality if the concern is subject to an external / police investigation / safeguarding issue where disclosure is required. An Employee will be advised should there be a possibility that their confidentiality cannot be maintained.

## Anonymous Concerns

Employees are encouraged to put their name to any allegation where possible. Anonymous allegations will be considered and investigated at the Trust's discretion. In exercising the discretion, the following factors may be considered:

- The seriousness of the issues raised
- The credibility of the concern/ allegation is very high; and
- The likelihood of confirming the allegation from attributable sources is very high

It should be noted that it may be more difficult to address the concern, support an employee or advise them of the outcome where a concern is reported anonymously.

## Support

Employees who raise a concern may wish to make use of the confidential counselling service provided by the Trust, if appropriate. Employees may also wish to consult their professional association or Trade Union if they are a member. Should an employee be required to give evidence in criminal or disciplinary proceedings – consideration will be given to appropriate

support.

## Other Concurrent Processes

Where a complaint is raised under the whistleblowing procedure this will not in itself be sufficient to halt any other ongoing processes relating to absence, conduct, performance or redundancy. However, each case will be considered on its merits to ensure that the Trust is acting reasonably.

## Record Keeping

Notes may be taken of all meetings with the employee held under this procedure. Where notes are taken a copy will be made available to the employee. All records relating to the management of whistleblowing disclosures will be gathered, processed, held and shared in accordance with the requirements of the General Data Protection Regulations and Data Protection Act (2018). In certain limited circumstances information may be shared by the Trust for the purpose of managing the disclosure. Please refer to the Trust's Data Protection Policy and Privacy Notice for further details.

A central record of whistleblowing will be maintained by the Governing Body. This record will include, a summary of the concern raised, action taken and the resulting outcome. Senior staff or Governors who receive whistleblowing concerns must ensure the concern is recorded.

## Monitoring and review

The CEO is responsible for monitoring the implementation and effectiveness of this policy. It will be reviewed by the directors at agreed intervals.

## Appendix A: Contact Details

It is the usual expectation that an employee will have endeavoured to raise the concern internally within the Trust before referring the matter to an external organisation.

### Internal

If you have any concerns, you can report these to:

### Trust staff

| Contact | Telephone Number | Email |
|---|---|---|
| Diane Browning<br>(CEO) | 01795 472578 | ceo@ba-mat.org.uk |
| Neil Peterson<br>(Chair of Trust Board) | Please email | clerktotrustees@timuacademytrust.org.uk |

### School specific staff

| | | |
|---|---|---|
| Katrine Stewart - Iwade<br>(Head of School) | 01795 472578 | Katrine.stewart@ba-mat.org.uk |
| Charlotte Wybraniec – Bobbing<br>(Head of School) | 01795 432 939 | charlotte.wybraniec@ba-mat.org.uk |
| Neil Dipple – Aspire<br>(HeadTeacher) | 01795 899788 | Neil.dipple@ba-mat.org.uk |
| Lauren Flain<br>(Head of School) | 01795 477 417 | Lauren.flain@ba-mat.org.uk |

### External

A comprehensive listing of 'prescribed persons and bodies' to which external disclosures may be made is available at: www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies;

Employees may also wish to raise a concern with:

- An elected member of the local authority
- Relevant trade union or professional association where the employee is a member
- A solicitor
- The police