Belvedere Infants and Junior School Whistleblowing Policy

Rewritten: July 2026
To be reviewed: July 2027

Introduction

This policy provides a framework for employees, workers, and contractors to raise concerns about issues happening at all schools within The Pioneer Academy. For example, health and safety risks, criminal or unlawful activity, or activities that could damage the environment. It sets out how concerns can be raised and the protection that people working for the organisation have if they raise an issue.

This policy covers concerns raised by employees, workers, and contractors. It reflects the specific protections they have in law when making a protected disclosure. This is also known as raising a whistleblowing concern or blowing the whistle. Further information on what a protected disclosure is, and who the law protects is set out below.

Belvedere Infants and Junior School is committed to maintaining high standards of integrity and accountability. It aims to create an open environment in which employees and those working on its behalf can raise issues and be confident that they will be acted upon. Our message to anyone working for us is straightforward - if in doubt, raise it!

The Public Interest Disclosure Act 1998 (PIDA) is the law that protects people against detrimental treatment or dismissal if they make a protected disclosure. It is part of the Employment Rights Act 1996. This policy is designed to reflect the legislation[1] as well as guidance from the government and other organisations[2].

A guide for managers and other employees on what to do if they receive a whistleblowing report is contained in appendix A of this policy. Training packages for both employees and managers on whistleblowing can be found on the e-learning platform. This provides further information on the principles set out in this policy.

[1] PIDA 1998 was updated by the Enterprise and Regulatory Reform Act 2013 and the Employment Rights Act 2025.
[2] Whistleblowing guidance has been issued by the Department for Business, Energy & Industrial Strategy, the National Audit Office and the charity, PROTECT.

Aims and Scope of the Policy

This policy aims to:

- encourage workers to raise concerns they have about their workplace or working practices
- make sure managers know what a whistleblowing concern is and how they must address it
- ensure that workers receive a response to any concern raised
- inform workers about how they can pursue an issue further if they are not satisfied with the action taken
- reassure workers that they will be protected from dismissal or negative treatment if they raise concerns.

This policy applies to most people working for the Trust. This includes employees, workers, agency personnel, contractors and staff seconded to or from a third party. Throughout the rest of the policy, the terms worker, or workers is used to mean anyone covered by the policy and the protections of PIDA.

PIDA does not currently provide protection under the law for job applicants, genuinely self-employed workers, or volunteers.

Definitions

Protected disclosures are concerns raised that are protected under PIDA. To be a protected disclosure, anyone raising a concern must:

- reasonably believe that their concern is in the public interest.
- reasonably believe their concern is a type of wrongdoing covered by the law.
- raise it in a way that that is in accordance with the law.

A reasonable belief is one where the whistleblower has some reasonable grounds or basis for believing there has been wrongdoing. It does not actually have to be true. For example, it does not matter if it turns out they were mistaken if they had reasonable grounds for believing it when they originally raised the concern.

An issue in the public interest means that it will usually affect people other than just the person raising it. Something that relates only to an individual's own employment may not be covered by the law. Although there are some circumstances when this could still be in the public interest. For example, an issue about bullying that reflects a wider cultural issue in a team or is in relation to sexual harassment. This policy is intended to cover workers raising an issue in the public interest. If a person needs to address a problem that relates only to their own employment, other than in cases of sexual harassment, then they should refer to the Employee Resolution Policy.

The list below sets out the types of concerns that qualify for protection under the law if they are raised.

- A criminal offence – for example corruption, theft, or fraud.
- Failure to comply with a legal obligation such as a statutory requirement, a contract, or common law obligations (eg negligence).
- A miscarriage of justice.

- Health and safety risks. This includes risks to anyone, not just workers – for example risks to customers and service users.
- Sexual harassment[3] has occurred, is occurring, or is likely to occur.
- Environmental damage – any wrongdoing that endangers or damages the environment.
- Cover-up. This includes anything where wrongdoing in any of the above areas has been deliberately concealed.

Safeguards

The Trust recognises that a decision to report a concern can be a difficult one. In many cases it is workers who are best placed to learn of wrongdoing within service areas and schools or to hear about issues where standards have fallen below those that the Trust and public expect. Belvedere Infants and Junior School is grateful to everyone who reports their concerns.

Workers should have nothing to fear by reporting their concerns if they have grounds for believing what they are reporting is true. Even if it is later found to be incorrect. No action will be taken against anyone genuinely reporting a concern.

While rare, deliberately false reports are sometimes made. If false or deliberately misleading information is provided, then this would be considered a serious matter. It could result in action being taken under the Trust's disciplinary policy. Equally, deterring another worker from reporting a genuine concern is also a serious matter and may result in disciplinary action being taken.

Belvedere Infants and Junior School will not tolerate any negative treatment (including harassment or victimisation) of a worker who has raised a whistleblowing concern, by anyone (including colleagues and managers). Any allegations of negative treatment of someone raising a concern will be investigated. Where evidence of mistreatment is found then this could result in disciplinary action being taken.

Belvedere Infants and Junior School recognises that workers may want to raise a concern in confidence under this policy. If a worker asks the Trust to protect their anonymity, then efforts will be made to protect their identity from being disclosed. However, this cannot be guaranteed. For example, if evidence needs to be presented in court, or revealed as part of a subsequent investigation. If it becomes clear that a whistleblower's anonymity cannot be protected, then this will be discussed with them before any disclosure is made.

Belvedere Infants and Junior School encourages workers to put their names to information they disclose. Concerns expressed anonymously will be considered by the Trust. However, they can be harder to investigate. This may make it more difficult to gather evidence to confirm wrongdoing. It will also not be possible to provide feedback to an anonymous whistleblower during or following an investigation. Anonymous reports are however preferred to silence.

[3] 3 As defined by the Equality Act 2010, section 26.

How to raise a Concern

Workers are encouraged to raise concerns with their line manager in the first instance[4]. Line managers will provide feedback to the whistleblower about the action they are taking. Contractors should report issues to the Trust's designated contract or client manager.

Concerns do not have to be made in writing. Any issues raised verbally will be treated just as seriously.

If a worker raises an issue with their line manager but it is not adequately addressed or if the concern involves the line manager, then they should speak to the Headteacher.

Belvedere Infants and Junior School recognises that there may be times when whistleblowers feel unable to speak to anyone in their own service area. For example, if they believe the issue involves more senior officers or if the issue has already been raised through the normal channels but has not been addressed.

If anonymous concerns are raised through social media, then they will be considered under the more general counter fraud or complaints policies unless it is beyond doubt that the person raising the concern would fall under the whistleblowing policy.

How the Trust will respond

All whistleblowing reports will be carefully considered. Initial enquiries will be made to help decide whether an investigation is needed or what action may be required.

Belvedere Infants and Junior School aims to acknowledge all whistleblowing reports within five working days. The line manager or person dealing with a whistleblowing issue will try to write or speak to the whistleblower promptly, to provide additional information on what is being done. For example, whether an investigation is needed or if specific action is to be taken.

If an investigation is undertaken, the line manager or investigating officer will provide feedback on the outcome, and details of action to be taken as far as possible. Although it may not always be possible to provide full details. For example, it would not be appropriate to share personal data about other people.

Investigation and Reporting Process

The steps line managers need to take will depend on the nature, complexity, and seriousness of the issue raised. An outline of the process managers should follow is set out below. Further information for managers on who they need to inform about whistleblowing issues is set out in the guidance at appendix A.

[4] People raising a concern may not directly say they are whistleblowing or making a protected disclosure, but it will still be considered as one. It is therefore essential that managers understand when an issue raised with them would be considered whistleblowing. Further information is available in the guidance notes included with this policy.

The amount of contact between people tasked with investigating whistleblowing concerns and the whistleblower will depend on the nature of the matters raised and the clarity of the information provided. If necessary, further information may be sought from the whistleblower.

If a face to face meeting is necessary or desirable the whistleblower has the right, if they so wish, to be accompanied by a Union representative or a colleague who is not involved in the area of work to which the concern relates.

Belvedere Infants and Junior School will take steps to support whistleblowers during an investigation, where possible. For example, if they are required to give evidence in any proceedings, the Trust will provide advice and support with the process as far as appropriate. Whistleblowers should contact their line manager if they suffer any negative treatment as a result of raising an issue. Investigating managers should be alert to the possibility of a whistleblower being mistreated.

All whistleblowing issues raised will be logged centrally by the Chief Operating Officer. The Chief Executive, and Head Teacher will be notified of relevant whistleblowing issues. Numbers of whistleblowing concerns raised and significant trends will also be reported annually to the Audit and Risk Committee.

How Matters can be taken further

This policy aims to provide workers with the means to raise concerns within the Trust. If workers have reported an issue in accordance with the policy, but are not satisfied that it has been addressed then they may contact the following prescribed bodies:

- The Whistleblowing Trustee – Kathy Cong
- the Internal Auditor – Elucidate Consulting Ltd
- the External Auditor – Azets
- the NSPCC or Ofsted (for concerns about children at risk of abuse)[5]
- relevant professional bodies or regulatory organisations [6], for example, the Information Commissioner's Office, Care and Quality Commission (CQC), and the Health and Safety Executive.

Disclosure of issues to a non-prescribed body (such as a newspaper or through social media) does not usually provide whistleblowers with protection under PIDA. Workers who are considering making a disclosure, other than to the prescribed bodies, should obtain specialist legal advice before doing so.

[5] The NSPCC and Ofsted offer dedicated national whistleblowing hotlines (see www.nspcc.org.uk and www.gov.uk/government/organisations/ofsted for further details).

[6] The Department for Business, Innovations and Skills maintains a list of prescribed persons and organisations who may be contacted, www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-peopleand-bodies.

Independent Advice

Free confidential advice on how to raise a concern about malpractice at work can be sought from the independent charity PROTECT. They can be found at www.protect-advice.org.uk, or contacted by email at info@protect-advice.org.uk. The charity's lawyers can give free confidential advice about how to raise a concern about serious malpractice at work.

Data Protection

When managing whistleblowing reports, the Trust processes personal data collected in accordance with its information governance policies. Data collected following receipt of a whistleblowing concern is held securely. It is only accessed or disclosed to individuals as necessary to manage, investigate, or take action in relation to the concern raised.

Review of Policy

This policy will be reviewed at least annually or when any significant changes to whistleblowing legislation, guidance or case law occurs.

Appendix A

Managers' Guidance on Whistleblowing

Introduction

Belvedere Infants and Junior School's whistleblowing policy aims to encourage employees, workers, and contractors[7] to raise concerns about activities in the workplace. It contains further information about what whistleblowing is and should be read alongside this guidance.

All managers are expected to take concerns raised by workers seriously and to follow the process set out in this guidance. Further training on whistleblowing is available through the Trust's e-learning platform.

What is a whistleblowing complaint?

Managers need to consider any concern raised by a worker about working practices or malpractice, to assess whether it is a whistleblowing issue.

The concern does not have to be raised in writing. Issues raised verbally should be treated as seriously as those raised in writing. You should carefully document anything raised verbally with you.

It is not necessary for the term "whistleblowing" or "protected disclosure" to be used for an issue to be considered whistleblowing. Any concern that falls under the types of issues covered by the policy may be a whistleblowing issue. The range of issues that could qualify is very broad and could include problems that may not initially appear very serious. For example, relatively minor breaches of health and safety processes or issues concerning a breach of contract. Care must therefore be taken to assess any issue raised with you, to consider whether it is whistleblowing.

Whistleblowing will generally be about issues that relate to more people than the individual who raised it. If it is clear that a concern relates only to an individual worker, apart from cases of potential sexual harassment, then it should be considered under the Grievance Policy. However, care is needed when deciding this. For example, a report of bullying could just be about one worker. However, it could also reflect a culture of bullying and harassment. In this case the concern may be whistleblowing.

Whistleblowing reports can only come from people who work for the Trust (including contractors). Concerns raised by members of the public or other groups would not be considered as whistleblowing. They should still be taken seriously though and directed to a senior manager.

Whistleblowing reports are often made anonymously. Where an anonymous report is made, you should try to encourage (but not pressure) the person to give their name. For example, if you are taking

[7] Throughout the rest of the guidance, the terms worker, or workers is used to mean anyone covered by the whistleblowing policy and the protections of PIDA.

information by phone or have an email address you can respond to. Make it clear that it can be more difficult to investigate concerns if contact with the whistleblower is not maintained.

Reporting the receipt of a whistleblowing concern

The policy sets out what managers should do when they receive a whistleblowing concern. Managers should also notify the chief executive and head teacher.

The Chief Operating Officer (COO) maintains a central log of all whistleblowing reports received. The outcome of any whistleblowing investigation and action taken should be reported to COO once the matter is completed.

If you are unsure about how to deal with a whistleblowing issue then you can seek advice from the COO. Any complex issues, or any case involving fraud, corruption or theft should be reported to the COO immediately. The COO will determine how the issue should be investigated, in consultation with other relevant officers.

If you receive details of a whistleblowing concern raised with an external body (one of the prescribed persons and organisations set out in the policy), the information should be forwarded to the COO.

Initial response

If you are notified of a concern, you should acknowledge it immediately. Unless it was raised anonymously (with no reply address) then this should usually be done by email. If you are notified verbally, you should try to find out as much information as possible and document it. Try to obtain contact details if possible. Where information is received in writing you should usually try to arrange a meeting with the whistleblower to gather further information.

This initial meeting can be done in person, in or outside of school premises, or by telephone. It is important to find an environment that the whistleblower feels comfortable with. They may be supported by a trade union representative or colleague. A note taker can be brought to the meeting with prior agreement from the whistleblower.

If anonymity is requested then every effort should be made to keep the whistleblower's identity concealed. However, anonymity cannot be guaranteed and you should not promise this. If it becomes apparent that a whistleblower's identity may become known, then they should be told about this as soon as possible.

All information relating to a whistleblowing report or gathered during a subsequent investigation should be kept confidential. Information should only be shared on a strictly need to know basis.

A record of any meetings with the whistleblower should be made either contemporaneously or as soon as possible afterwards. These notes must be kept securely.

No commitments should be made about the process or outcome of a whistleblowing investigation. However, the whistleblower should be reassured that their concerns will be taken seriously.

Any additional information you obtain should be shared with the people you have already notified.

Conducting an investigation

At the start of an investigation, the person looking into the issue should inform the whistleblower that they are investigating the matter.

It is best practice to provide updates to the whistleblower during the investigation if appropriate. However, only limited information can be shared. Personal data about other people must not be shared. Nor can any information that may prejudice the investigation. In some cases, it may be better to wait until the end of the investigation before sharing any details (although personal data cannot be shared at any point).

Notes should be made throughout the investigation about the action being taken and evidence collected. Conclusions should also be documented.

The investigator should consider whether any action to be taken during the investigation is likely to lead to the identity of the whistleblower becoming known. If it becomes apparent that the investigation cannot be pursued without the whistleblower's identity becoming known, then they should be made aware of this before further action is taken. The whistleblower's name should only be made known to other people on a need-to-know basis.

Investigations should be completed as quickly as possible. Where a whistleblowing investigation leads to other processes being considered or commencing (such as a pre-disciplinary investigation, referral to the police) then relevant people should be made aware at an early stage.

At the conclusion of an investigation a report should be prepared setting out all of the evidence gathered and stating whether it confirms or contradicts the original issue raised. It should also set out the conclusions reached, and recommendations. The report should be shared with those notified of the issue originally. A copy should be securely stored in line with the Trust's data retention policy.

As far as practicably possible, feedback upon conclusion should also be given to the whistleblower to assure them that their concern has been addressed. Any feedback given must ensure it does not breach laws governing the protection of personal data..

Special circumstances

Safeguarding concerns

If a concern raised includes issues relating to safeguarding, then the manager notified should ensure that it is raised immediately through normal safeguarding arrangements.

Anonymous concerns

If a concern has been made anonymously then it must still be treated as credible and dealt with through the procedure detailed in this guidance.

Negative treatment of the whistleblower

The Trust will not tolerate any negative treatment of whistleblowers. If any manager becomes aware of any mistreatment of a whistleblower, they should report this to the Director of HR as soon as possible. The Trust may be in contravention of whistleblowing legislation if action is not taken to address this behaviour.

Vexatious or malicious reports

If a whistleblower acts in bad faith or raises malicious, vexatious, or knowingly untrue concerns then they may be subject to disciplinary action. If you have reasonable grounds to suspect that this may be the case, then the matter should be reported to the Director of HR

External disclosures

It is important to be supportive and encouraging to those raising a concern. However, if a worker indicates that they are considering taking their concerns outside of the organisation, for example to the media or social networking sites, you should advise them of the following:

- You may not be able to support them if they take this action
- Their disclosure may not be covered by the whistleblowing policy and relevant legislation
- Their action may represent an unauthorised disclosure
- They could jeopardise any legal protection that they may have in law
- They could be subject to disciplinary action themselves
- They should take specialist advice before doing so, eg from PROTECT.

If a whistleblower makes an external disclosure, then this should be reported to the COO as soon as possible. Some types of disclosure are covered by legislation. However, consideration of whether the action taken is appropriate or not will need to be considered on a case by case basis.

Support

If you have any queries or issues about whistleblowing then you can seek further advice from the COO.