



## Whistle Blowing Policy

Date Reviewed:	February 2026
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Date ratified	31 March 2026
Review date	March 2027

### Introduction

Veritas Multi Academy Trust is committed to the highest possible standards of openness, probity and accountability and we encourage employees and others working with us to raise any concerns about any aspect of our work, to come forward and voice those concerns. In some instances, concerns may need to be expressed on a confidential basis.

This procedure encourages employees to raise serious concerns, without fear of reprisal or victimisation, internally within Veritas Multi Academy Trust rather than over-looking a problem or raising the matter outside.

It applies to all employees, agency workers and those contractors working on Veritas Multi Academy Trust premises, for example, cleaners, builders and drivers. It also covers suppliers and those providing services under a contract with Veritas Multi Academy Trust in their own premises.

### Legislation

The requirement to have clear whistle-blowing procedures in place is set out in the [Academy Trust Handbook](https://www.gov.uk/guidance/academies-financial-handbook/academy-trust-handbook-2021) <https://www.gov.uk/guidance/academies-financial-handbook/academy-trust-handbook-2021> and Keeping Children Safe in Education (KCSIE).

This policy has been written in line with the above documents, as well as [government guidance on whistle-blowing](#). We also take into account the [Public Interest Disclosure Act 1998](#).

## 1. Definition of Whistleblowing

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

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

A whistle-blower is a person who raises a genuine concern relating to the above.

## Other Complaints Procedures

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.

Protect (formerly Public Concern at Work) has:

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

Alternatively, employees can raise their concerns confidentially with the Governance Professional for the Trust, who can provide guidance as to which policy should be followed.

There are existing procedures in place to enable individuals to lodge a grievance relating to their own employment, including issues relating to harassment and bullying via the Fairness at Work Policy.

Concerns about any aspect of service provision or the conduct of The Senior Team, Governors, MAT Trustees or academy Staff Members or others acting on behalf of the academy, can be reported under the Confidential Disclosure Procedure within the Fairness at Work Policy. This may be about something that you:

- feel uncomfortable about in terms of known standards, your experience or the standards they believe Veritas Multi Academy Trust subscribes to: or
- is against the MAT’s Standing Orders and policies; or
- falls below established standards of practice; or
- amounts to improper conduct.

Any investigation into allegations of potential malpractice under this procedure will not influence or be influenced by any disciplinary or redundancy procedures that already affects an individual.

## 2. Aim & Scope

This procedure aims to ensure individuals are:

- encouraged to feel confident in raising serious concerns and to question and act upon concerns about practice;
- provided with avenues to raise concerns and receive feedback on any action taken;
- given a response to their concerns and are aware of how to pursue them if not satisfied;
- reassured that they will be protected from reprisals or victimisation if they have a reasonable belief any disclosure has been made in good faith.
- All staff are aware of the whistleblowing process and how concerns will be managed.

These include (but not limited to):

- 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 occur the result of which Veritas Multi Academy Trust fails to comply with a legal obligation. For example, unauthorised use of public funds, possible fraud and corruption, sexual or physical abuse of clients, or other unethical conduct discrimination of any kind and waste/frivolous expenditure;
- conduct which puts pupil's or staff health and safety being put in danger;
- disclosures related to past, current or likely miscarriages of justice;
- past, current or likely health and safety risks, including risks to the public as well as other employees (see below);
- past, current or likely damage to the environment.

A whistle-blower is a person who raises a genuine concern relating to the above.

### **3. Procedure for staff to raise a whistleblowing concern**

#### **3.1 When to raise a concern**

Staff should consider 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.

The earlier a concern is raised the easier it is to take action. Although you are not expected to prove beyond doubt the truth of an allegation, you need to demonstrate to the person contacted that there are sufficient grounds for your concern.

#### **3.2 Who to report to**

Whenever possible you should raise your concern with your immediate manager, your headteacher, the CEO. If this is not appropriate, you should approach the MAT Governance Professional who will direct you appropriately, for your concern to be heard.

Email:

All suspected financial irregularities via the **Anti Fraud Checklist for Academy Trusts or the Trust's Fraud Policy** must be reported to the Chair of the Trust Board (via the Governance Professional email as above).

#### **3.3 How to raise the concern**

Concerns can be raised verbally or in writing. A concern raised in writing should:

- set out the background and history of the concern, giving names, dates and places where possible;
- the reason why you are particularly concerned about the situation.
- Include any details of any personal interest in the matter (where appropriate).

### **Anonymous Allegations**

Whenever possible you should put your name to your allegation as concerns expressed anonymously are much less powerful than those that are attributed to a named individual. However, anonymous allegations will be considered and investigated at the CEO's or Chair of Trustee's discretion.

In exercising discretion, the factors to be taken into account would include:

- the seriousness of the issues raised
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

## **4. Trust Procedure for responding to a Whistleblowing Concern**

The action taken will depend on the nature of the concern. The matters raised may:

- be investigated internally by management, Internal Audit or through the disciplinary or other internal process;
- be referred to the Police;
- be referred to the External Auditor;
- be referred to the appropriate office at KCC or MAT;
- form the subject of an independent inquiry.

In order to protect individuals and Veritas Multi Academy Trust, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

Concerns or allegations which fall within the scope of specific procedures (e.g., child protection or discrimination issues) will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.

The Trust will ensure all concern raised by whistleblowers are responded to properly and fairly.

## **5. Investigating the concern**

When a concern is received by the [headteacher/CEO/trustee/other named person] – referred to from here as the 'recipient' – they will:

Complete an initial assessment

- Immediately assessing the credibility and potential impact of the allegation
- Determine whether the allegation falls within the scope of this policy, and whether it should be escalated to a formal investigation.

- If the allegation is deemed credible, the recipient should refer to the table below and advise the named individual(s) directly or via the Governance Professional will be informed promptly and a formal investigation will be initiated.
- The initial assessment will be reviewed by the relevant parties identified below, who will agree if any additional agencies need to be notified.

Type of Whistleblowing Concern	Who to conduct formal investigation	Other parties to be notified
Fraud, Corruption and Bribery	Trust Business Manager and/or Accounting Officer	Chair of Risk and Audit, Chair of Trust Board.  DfE for all instances of fraud, theft, bribery or irregularity exceeding £5,000 in any financial year (individually or cumulatively). Unusual or systematic fraud must also be reported. See Fraud Policy for all reporting lines.
Breach of legal obligation	Trust CEO	Chair of Trust Board
Health and Safety or someone is in danger	Trust Business Manager	Chair of Trust Board
Risk or damage to the environment	Trust Business Manager	Chair of Risk and Audit / Trust Board
Law breaking or criminal offence	Trust CEO	Trust Business Manager
Miscarriage of justice / wrongful conviction	Trust CEO	Chair of Trust Board
Concealment of any of the above	Trust CEO / Trust Business Manager	Chair of Trust Board

## Formal investigation process

The investigation will be conducted thoroughly, professionally and confidentially. The aim of the investigation is to:

- Establish the facts
- If fraud or an attempt to defraud has been made, determine the extent of this
- Identify all those involved
- Quantify any risks, losses or damages
- Identify any internal controls or processes which may have enabled any activity to occur.

The initial investigation meeting includes:

- Meeting 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

- 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 this section 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, Local Academy Committee Chair 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.

Further investigation meetings may be required to complete the findings of the investigation, or the investigation may be transferred to other policy procedures deemed more appropriate, ie. Discipline and Conduct.

External agencies may be required to complete their own investigations, if deemed appropriate to notify additional agencies, as identified above, within the process. Depending on the nature of the concern raised, there may be additional reporting requirements to the Department of Education, for example in the case of fraud (see the Fraud Policy), or as part of separate Discipline and Conduct Procedures, for example (See Discipline and Conduct Policy).

### Attending Meetings

- When a meeting is arranged staff members have the right to be accompanied by a trade union representative or a workplace colleague who is not involved in the area of work to which the concern relates.

## 6. Outcome of the investigation

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:

- acknowledging that the concern has been received;
- 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.
- whether further investigations will take place and, if not, why not.
- 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.
- whether further investigations will take place and, if not, why not.

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.

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

An outcome letter will usually be sent within 10 working days of the conclusion of the Investigation.

## Support for employees raising a concern

The CEO or Chair of the Trust Board of Veritas Multi Academy Trust (and where appropriate MAT Trustees) will take steps to minimise any difficulties you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, KCC or the MAT Board will advise or arrange for you to have advice about the procedure.

The CEO and Trustees of Veritas Multi Academy Trust will not tolerate harassment or victimisation (including informal pressures) and will take action to protect individuals who raise a concern in good faith.

The CEO and Trustees of Veritas Multi Academy Trust accepts that you need to be assured that concerns will be properly addressed and, subject to legal constraints, will provide information about the outcomes of any investigations.

## 7. Confidentiality

All concerns raised will be treated in confidence and every effort will be made not to reveal your identity if this is your wish. However, in certain cases, it may not be possible to maintain confidentiality if you are required to come forward as a witness.

## 8. 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 untrue, invented or malicious, the Trust will consider whether any disciplinary action is appropriate against the person making the allegation.

## 9. Escalating the concerns beyond the Trust

This procedure is intended to provide individuals with an avenue to raise concerns within Veritas Multi Academy Trust and where appropriate within KCC, but recognises that staff may feel the need to report concerns to an external body.

If you are not satisfied, and feel it is right to take the matter further, the following are possible contact points:

- Public Concern at Work
- Audit Commission
- Relevant professional bodies or regulatory organisations
- Solicitor
- Police

If a matter is taken outside the MAT, you must take all reasonable steps to ensure that confidential or privileged information is not disclosed. If in doubt, check with the MAT Governance Professional and Company Secretary.

## 10. Public Interest Disclosure

Public Interest Disclosure Act 1998 gives employees two safeguards in respect of disclosures of information.

- An employee is entitled not to be subjected to any detriment by virtue of having made a protected disclosure.
- The dismissal of any MAT employee directly due to the individual having made such a disclosure will automatically be unfair.