Mid-Trent Multi Academy Trust

Whistleblowing Policy

September 2025

St Andrew's CE Primary School

Colwich CE Primary School

St Peter's CE Primary School

Flourish Early Education

Document Control Information

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Author	Charlotte Pilkington (Headteacher on behalf of MT MAT)
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Version History				
Version	**Date**	**Detail**	**Author**	**Key Changes**
1.0	17.07.2018	Initial	J. Alexander	
1.1	03.12.2020	Reviewed	A. Nield	Reviewed – No significant changes.
2.0	17.07.2022	New	C. Pilkington	New Policy based on new policy guidance.
2.1	01.09.2023	Review	P Hayward	Updated chair of Trust contact details
2.2	30.04.2024	Review	C. Pilkington	No changes
2.3	01.09.2025	Review	C. Pilkington	No changes

Approval History			
Version	**Approver**	**Date**	**Included in the minutes of**
1.0	MAT Board	17.07.2018	MAT Board of Trustees Meeting 17.07.2018
1.1	MAT Board	03.12.2020	MAT Board of Directors Meeting 03.12.2020
2.0	MAT Board	08.12.2022	MAT Board of Directors Meeting 08.12.2022
2.1	CEO	01.09.2023	
2.2	CEO	10.05.2024	
2.3	CEO	03.07.2025	Leadership Forum Minutes 03.07.2025

1. Introduction

The Mid-Trent MAT is committed to highest possible standards of honesty, openness, probity and accountability. It seeks to conduct its affairs in a responsible manner, to ensure that all its activities are open and effectively managed, and that integrity and principles of public interest disclosure are sustained.

In line with that commitment we encourage employees, those working on behalf of the school and others that we deal with, who have concerns about any aspect of the school's work to come forward and voice those concerns at the earliest opportunity.

2. Aims

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)

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.

3. Legislation

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.

4. Definition of whistle-blowing

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
- Breaches of financial management procedures
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment

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. Where a safeguarding concern is raised regarding an adult the school's 'Managing Allegations against Staff' procedures within the Safeguarding (inc. Child Protection) policy will be followed.

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

5. Procedure for staff to raise a whistle-blowing concern

5.1 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.

5.2 Who to report to

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 Chair of the school's local academy committee or the MAT CEO. If the concern is about the CEO, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the Chair of the MATs board of Directors

Contact Information			
	Name	**Email**	**Phone**
Headteacher	Charlotte Pilkington	cpilkington@mid-trentmat.co.uk	01889 270233 07972157202
Chair of Local Academy Committee	Michael Whitfield	mwhitfield@mid-trentmat.co.uk	01889 270233
CEO	Paul Hayward	ceo@mid-trentmat.staffs.sch.uk	07587086352
Chair of the MAT Board of Directors	Kerry Reynolds	kreynolds@mid-trentmat.staffs.sch.uk	07811400071

5.3 How to raise the concern

Concerns should be made in writing wherever possible. They should include names of those committing wrong doing, 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.

6. Trust procedure for responding to a whistle-blowing concern

6.1 Investigating the concern

When a concern is received by the headteacher, CEO or Chair of the Board - 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
- 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 7 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, Chair of Local Academy Committee, Chair of Board of Directors, if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In other cases, 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.

6.2 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 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.

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.

Beyond the immediate actions, the headteacher, trustees and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

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

7. 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.

8. Escalating concerns beyond the trust

The trust encourages staff to raise their concerns internally, in line with section 5 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.

- Diocesan Board of Education

- Protect (Formerly Public Concern at Work). This is an independent charity that operates a confidential helpline to provide free impartial advice 020 3117 2520 or www.protect-advice.org.uk
- A relevant Trade Union
- Citizens Advice Bureau
- Relevant Professional Bodies
- Regulatory Organisations
- Local Police

If you choose to take the matter outside of the academy and Multi Academy Trust then the employee should ensure that they do not disclose confidential information. Within the Academy all staff have a duty of confidentiality. The duty of confidentiality is implied by the law in every contract of employment and prohibits employees from publicly disclosing employers' confidential information, unless it is in the public interest that the information is disclosed or unless the Academy fails to follow required procedures. Other legal restrictions on the disclosure of information, for example under data protection legislation, may also apply.

Whistleblowing to an external agency without first going through the internal procedure is a breach of the Academy's Code of Conduct.

Whistleblowing to the media is not appropriate or permitted in any circumstances.

9. Links with other policies

This policy links with our policies on:

- Staff grievance policy
- Complaints procedure
- Safeguarding (inc. Child Protection) policy

10. Monitoring and Evaluation

The CEO, supported by Headteachers in each school, is responsible for monitoring and implementing this policy on a daily basis. All adults who work and volunteer within our schools should be made aware of this policy and have open access to it through the MAT online SharePoint. When concerns about any aspect of the school's work arise, it is expected that those with concerns will come forward and voice those concerns at the earliest opportunity.

The CEO is responsible for reporting to the MAT Board of Directors regularly on how the policy is being enforced and upheld across the MAT. Headteachers within each school are responsible for reporting to their Local Academy Committees regularly on staff awareness and use of this policy.

11. Approval and Review

This policy will be reviewed a minimum of every 2 years by Trust staff (as applicable); representatives of Trust schools' Local Academy Committees and approved by the Board of the Mid-Trent MAT.

Signed:  Paul Hayward (CEO of the Mid-Trent MAT)

Date of latest policy review: 1st September 2025
Date of next review: September 2027