Whistleblowing Policy

Version:	**2.7**		
Ratified by:	**Board of Trustees**	**Date:**	**15th July 2026**
Next Review date:	**July 2028**		

Contact details that may be required for whistleblowing

CEO - jmorris@sussexlearningtrust.co.uk
DCEO - sdavis@sussexlearningtrust.co.uk
Chair of Board of Trustees - jashedwards@sussexlearningtrust.co.uk
Chair of Governors at NWPA - adam@sussexlearningtrust.co.uk
Acting Chair of Governors at WPPA - bswithenbank@sussexlearningtrust.co.uk
Chair of Governors at WPSA - jashedwards@sussexlearningtrust.co.uk
Chair of Governors at WGPA - jon.brydon@sussexlearningtrust.co.uk
Chair of Governors at CFS - imoore@chichesterfreeschool.org.uk
Chair of Governors at BHPA - nwaters@billingshurstprimary.org.uk
CFO (Central Executive Team) jenny.howard@sussexlearningtrust.co.uk
CPO (Central Executive Team) julie.keylock@sussexlearningtrust.co.uk
COO (Central Executive Team) jon.hickey@sussexlearningtrust.co.uk

1. Sussex Learning Trust (SLT) is a Multi-Academy Trust (MAT) and this policy and procedures covers all member academies within Sussex Learning Trust. Each member of SLT staff must read this policy at least once a year and sign to acknowledge they have done so and that they understand their responsibilities in respect to whistleblowing. Each academy Head has a responsibility for ensuring this record is maintained and updated at the beginning of each academic year and that new staff that join mid-year read and sign accordingly.

2. The Trust is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees who have serious concerns about any aspect of the work of the Trust or any of its academies to come forward and voice those concerns. This procedure makes it clear that this can be done without fear of victimisation, subsequent discrimination or disadvantage. It is intended to encourage and enable whistleblowers (see 4.1) to raise serious problems within the academy in which they work, or the wider Trust, rather than overlooking a problem or "blowing the whistle" outside. This procedure is fully consistent with the model policy recommended by WSCC for its schools and which the council consulted with the relevant trade unions and professional organisations and has their support.

3. These procedures are in place to encourage individuals to put their name to and raise their concern, as anonymous allegations may often be difficult to investigate, substantiate/prove. Concerns expressed anonymously are much less powerful but will be investigated unless the Trust's Finance Audit & Risk Committee acting in a monitoring role in consultation with the Chair of the Board of Trustees and CEO agrees there is insufficient evidence to proceed.

The Board of Trustees has appointed the Finance, Audit & Risk Committee to take specific responsibility for this procedure and policy.

4. What is whistleblowing?

4.1. Whistleblowing is the term used to describe reporting by stakeholders, usually employees or ex-employees, Trustees, Governors or volunteers, of wrongdoing on the part of management, the Trustees, a Governing Body or fellow employees.

4.2. Wrongdoing may include for example, fraud, corruption, malpractice, sexual harassment, a breach of health and safety law, any other illegal or unethical act or breaches of the Sussex Learning Trust Code of Conduct for Staff. Whistleblowers may for this purpose include, for example, contractors and agency workers.

5. Protecting the whistleblower

5.1. Under Part IVA of the Employment Rights Act 1996 (as inserted by the Public Interest Disclosure Act 1998) a whistleblower is protected from detriment and unfair dismissal if they believe they are acting in the public interest. The Trust and each member academy will support and not discriminate against concerned employees or other whistleblowers who apply the whistleblowing procedure, provided any disclosure is made in good faith.

5.2. The Trust recognises that the decision to report a concern can be difficult to make, not least because of the fear of reprisal from those responsible for the subject that gives rise to the concern. If concerns are raised in good faith, there will be nothing to fear because a whistleblower will be doing their duty to their employer and/or to those for whom they are providing a service.

6. When should whistleblowing procedures be used?

6.1. Whistleblowing procedures should be used where there is a major concern over any wrongdoing within the Trust relating to unlawful conduct, financial malpractice or dangers to the public or environment.

6.2. Examples could include:

- A criminal offence (e.g. fraud, corruption or theft) has been/is likely to be committed
- A miscarriage of justice has been/is likely to occur
- The health or safety of any individual has been/is likely to be endangered
- The environment has been/is likely to be damaged
- Sexual harassment has been/is likely to be committed

- Public funds are being used in an unauthorised manner
- The Trust's Governance arrangements have or are not being observed or are being breached by students, volunteers or staff.

The above does not represent an exhaustive list of areas covered by Whistleblowing.

6.3. Whistleblowing is not appropriate for dealing with grievances between an employee and the Trust which relate to the employee's own employment or rights of employment conditions generally.

6.4. Whistleblowing is not appropriate for dealing with pupil/student complaints, which will be dealt with under the complaints procedures.

6.5. Whistleblowing is not appropriate to specific case(s) matters relating to child safety, child protection or safeguarding, which will be dealt with under the procedures and policy in place for such matters.

7. How to raise concerns

7.1. Step 1: Employees or volunteers should normally raise concerns with their immediate line manager and inform them about using this procedure. However, the Trustees and Governors recognise that on occasion this may not be appropriate. This depends, however, on the seriousness and sensitivity of the issues, in these cases the concern should be raised with the Executive Principal, Headteacher, Head of School or a member of the Central Executive Team of the Trust. In exceptional circumstances, or if the matter relates to a Headteacher, the concern should be raised with the CEO or DCEO of Sussex Learning Trust. If the matter concerns the CEO, then the Chair of Trustees should be consulted.

7.2. For other stakeholders a number of alternative contacts may be appropriate depending on the nature of the concern. For example, approach a more senior manager in the academy such as a member of the Leadership Team or a Governor. The whistleblower may also contact the CEO or a Trustee of Sussex Learning Trust. Concerns may be raised verbally initially but will need to be formalised in writing. Preferably concerns must be raised in writing without undue delay setting out the background and history of the concern, giving names, dates and places where possible, and the reason for the whistleblower's particular concern.

7.3. Although whistleblowers are not expected to prove beyond doubt the truth of the concerns, they will need to demonstrate reasonable grounds to raise them. Where employees fail to report their concerns they may themselves become implicated and consequently the Trust may treat failure by an employee to report such matters as a serious matter, which could lead to disciplinary action. Employees may wish to obtain assistance in putting forward a concern from a Trade Union representative or a colleague and may choose to be represented by a Trade Union representative or colleague at any meetings that are required.

7.4. Step 2: within five working days of a concern being received in writing, the Trust will write to the whistleblower:

- acknowledging that the concern has been received;
- indicating how it proposes to deal with the matter;
- giving an estimate of how long it will take to provide a final response;
- telling the whistleblower whether any initial enquiries have been made, and

- telling the whistleblower whether further investigations will take place, and if not, why not. Employees will also be provided with details of support available.

7.5. Step 3: the action taken by the Trust will depend on the nature of the concern. The matters raised maybe:
- investigated internally;
- referred to the police;
- referred to the local governing body;
- referred to the Trustees;
- form the subject of an independent inquiry investigated externally.

7.6. In order to protect individuals and those accused of possible wrongdoing or malpractice, initial enquiries will be made by the relevant senior leader to decide whether an investigation is appropriate and, if so, what form it should take.

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

7.8. The amount of contact between the officers considering the issues and the whistleblower will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided.

7.9. The Trust will take steps to minimise any difficulties which employees may experience as a result of raising a concern.

7.10. The Trust accepts that whistleblowers need to be assured that the matter has been properly addressed and will ensure this happens.

7.11. Subject to legal constraints, whistleblowers will normally receive feedback about the outcomes of any investigations.

7.12. This policy is intended to provide whistleblowers with an avenue to raise concerns within the Trust. The Trust hopes that whistleblowers will be satisfied with any action taken under Sussex Learning Trust policy and procedures.

7.13. If the whistleblower raising the concern is unhappy with the outcome the next steps are to contact the Chair of the Board of Trustees. A whistleblower should, prior to raising the concern outside of Sussex Learning Trust, first go through the internal procedure.

Link Documents, Policies and Procedures

These procedures are intended to supplement, rather than to replace, the existing complaints, disciplinary and grievance procedures. It is intended to cover serious concerns that fall outside the scope of other procedures and may relate to something which:

- Is contrary to the Trust's Financial Regulations or Safeguarding Policies, or
- Is against the Trust's, or individual academy's policies and procedures, or

- falls below established standards of practice or amounts to improper conduct.

This policy will be monitored by the Finance, Audit & Risk Committee as part of the Trust's policy review or as required by legislature changes and the requirements of the ESFA/DfE, for example updates in the Academy Trust Handbook and other publications.

Further guidance:

Department of Business, innovation and skills guidance

National Community Volunteers Organisation information about PIDA

Appendices to Whistleblowing Policy

Responding to receiving a whistleblowing concern

1. Remain Calm and Professional

- Thank the whistleblower for coming forward.
- Reassure them they are doing the right thing and will not suffer any detriment for raising a concern in good faith.

2. Listen and Record

- Allow the individual to speak freely.
- Do not ask leading questions.
- Take notes or ask them to provide a written statement, capturing:
    - Dates, times, locations
    - People involved
    - What was observed or heard
    - Why it is a concern
- You should explain what happens next, including reminding them of the procedure set out in 7.4 of the policy.

You are not Investigating the matter yourself

- Your role is to receive, not resolve, the concern.
- Do not discuss the disclosure widely or take any independent action.

3. Liaise with a colleague holding the most senior position that is not implicated in the matter raised. i.e. usually the CEO or Chair of Board of Trustees, unless they are implicated, in which case their Vice or Deputy.

Together you will clarify the nature of the concern.

Whistleblowing is appropriate if the issue involves:

- Fraud, corruption or theft
- Breach of health & safety or safeguarding law
- Misuse of public funds
- Breach of governance, code of conduct, or Trust policy
- Damage to the environment

4. The most senior person will proceed with the matter as per 7.4 and 7.7 of the policy i.e.

"7.4. Step 2: within five working days of a concern being received in writing, the most senior officer or Trustee will write to the whistleblower:

- *acknowledging that the concern has been received;*
- *indicating how it proposes to deal with the matter;*
- *giving an estimate of how long it will take to provide a final response;*
- *telling the whistleblower whether any initial enquiries have been made, and*
- *telling the whistleblower whether further investigations will take place, and if not, why not.*

Whistleblowers will also be provided with details of support available.

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

5. At all times maintain confidentiality

- Share information only on a need-to-know basis with appropriate senior personnel.
- Protect the identity of the whistleblower where possible.

a) 7.1 of the policy states that employees or volunteers should normally raise concerns with their Line Manager but also provides guidance in the event of this being inappropriate.

b) In order to ensure quality assurance, a member of the Central Executive Team (CEO, DCEO, CFO, CPO or CEDO) must at least be made aware of the whistleblowing concern, if they are not already the most senior person the matter has been escalated to, raised and agree who is taking the lead in Steps 2 and 3 outlined in 7.4 and 7.5 of the policy.

Document Version Control

Date	Version	Comment	Ratified by	Reviewer
8.6.26	2.7	To explicitly include sexual harassment as a stated protected disclosure under this policy	Board of Trustees 15.7.2026	CPO
Version history				
23.5.24	2.4	Central Executive Team added as officers to whom concerns can be raised. Response from the Trust to concerns raised reduced to 5 working days from 10 to speed up processes. Audit & Risk Committee changed to Finance, Audit & Risk Committee Contact details for DCEO added and included as a potential Senior Official to be contacted to report a concern Contact details of Executive team & Chairs of governors updated	Board of Trustees 17.7.24	J Morris
29.4.25	2.5 2.6	Contact details of Chair of WPPA updated Contact details of Chair of NWPA updated after change of Chair	Executive Review/ Governance Support Executive Review/ Governance Support	CEO CEO
9.5.25	2.6	Addition of appendices - responding to whistleblowing concerns - Links to further guidance	Central Executive Team	J Morris/ Finance, Audit & Risk Committee