



Whistleblowing Policy

Quest Learning Trust

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This document sets out the regulations for the MAT and member academies and remains in force until superseded

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1. Introduction

Quest Learning Trust is committed to maintaining the highest standards of openness, accountability and integrity. The board encourages employees and stakeholders to raise concerns where they reasonably believe wrongdoing, malpractice or risks to children may exist.

The board will appoint a designated director with oversight of whistleblowing arrangements, reporting trends and ensuring appropriate investigations are undertaken.

The board will receive an annual anonymised report summarising whistleblowing disclosures, themes, outcomes and lessons learned.

The trust aims to:

- Encourage a culture where all individuals feel able to raise concerns about alleged wrongdoing and report them at the earliest opportunity, in the knowledge that concerns will be taken seriously and acted upon and that confidentiality will be respected wherever possible; however, anonymity shall not be an automatic right
- Ensure staff know how to raise concerns about potential wrongdoing and encourage concerns to be raised by anyone working with or on behalf of the organisation
- Set clear procedures for how the board will respond to such concerns, ensuring that staff know that concerns raised will be responded to properly and fairly
- Let all staff know the protection available to them if they raise a whistleblowing concern; information will only be shared on a need-to-know basis and in accordance with data protection requirements
- 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 – see section 6 below)
- Ensure staff know that they are protected by law and that a non-disclosure agreement, confidentiality clause or 'gagging clause' in a settlement agreement or employment contract cannot stop them from making a protected disclosure in the public interest
- Ensure all staff understand their duty to raise concerns about safeguarding practices within the organisation, including concerns about the behaviour of adults working with children, in line with statutory safeguarding guidance

This policy does not form part of any employee's contract of employment and may be amended at any time.

This policy applies to all employees, volunteers, trainee teachers, officers and directors. Other workers, including consultants, contractors, casual workers, agency staff and those on work placements, are also encouraged to use it.

2. Legislation

The requirement to have clear whistleblowing procedures in place is set out in the [Academy Trust Handbook](#). [Keeping Children Safe in Education](#) (KCSIE) also sets out expectations for schools to have appropriate whistleblowing procedures.

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

This policy complies with our funding agreement and articles of association.

3. Definition of whistleblowing

Whistleblowing covers concerns made that report wrongdoing or dangers at work that is “in the public interest”. Examples of whistleblowing include (but are not limited to):

- Criminal offences, such as theft, fraud, bribery or corruption
- Financial impropriety, procurement concerns or misuse of public funds.
- Breaches of financial management procedures, such as a failure to follow internal rules or policies
- Pupils’ or staff health and safety being put in danger
- Poor or unsafe safeguarding practice in the trust or its schools, including potential failures in provision as well as the failure to act on concerns about a child or the behaviour of an adult
- Failure to comply with a legal obligation or statutory requirement
- Discrimination, victimisation, harassment or breaches of equality legislation that present a wider public-interest concern
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Risk or damage to the environment

A whistleblower is a person who raises a genuine concern relating to the above. These genuine concerns relating to suspected wrongdoing or danger affecting any of the trust activities should be reported under this policy.

Not all concerns about the trust, or individual schools in the trust, count as whistleblowing. For example, personal staff grievances, such as bullying or general harassment do not usually count as whistleblowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance.

If a complaint involves personal circumstances alongside wider concerns regarding one of the areas set out above (e.g. pupil health and safety), the staff member must consult with the People Team to decide the most appropriate reporting procedure.

When staff have a concern, they should consider whether it would be better to follow our staff grievance or complaints procedures. Advice can be sought from the People Team.

Safeguarding concerns or allegations about the behaviour of staff that do not meet the harm threshold (‘low-level concerns’) should be reported in line with the school’s Safeguarding Policy. Where concerns indicate a pattern of behaviour or a culture of unsafe practice, they may be addressed under this whistleblowing policy.

[Protect](#), an independent whistleblowing charity, has further guidance and a free and confidential advice line on the difference between a whistleblowing concern and a grievance that staff may find useful if unsure.

4. Procedure for staff to raise a whistleblowing concern

4.1 When to raise a concern

Staff should consider the examples in section 3 when deciding whether their concern is of a whistleblowing 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.

4.2 Who to report to

School-based 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, or where the matter is more serious or feel that the headteacher has not addressed their concern or prefer not to raise it with them for any reason, the staff member should report their concern to the Chair of the ASC or to the CEO.

Central team staff should report their concern to the CEO. If the concern is about the CEO, or it is believed they may be involved in the wrongdoing in some way, the central team staff should report the concern to the Chair of Directors.

The email address for the CEO can be found on the intranet. The Chair can be contacted by emailing chair@qlt.org.uk

4.3 How to raise the concern

Concerns should be made in writing wherever possible. They should include the names of those alleged to be committing wrongdoing, 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.

Staff are encouraged to give their name when reporting an allegation, to help the trust take the investigation further. The board hopes that staff will feel able to voice whistleblowing concerns openly under this policy. However, if the staff member wants to raise their concern confidentially, every effort will be made to keep their identity secret. If it is necessary for anyone investigating their concern to know their identity, they will discuss this with the staff member.

The board does not encourage staff to make disclosures anonymously, although will make every effort to investigate anonymous disclosures. The staff member should be aware that a proper investigation may be more difficult or impossible if further information cannot be obtained from the staff member. This will also make it more difficult to establish whether any allegations are credible.

Staff who are concerned about possible reprisals if their identity is revealed should consult with the People Team or one of the contact points listed in section 4.2, and appropriate measures can be taken to protect confidentiality where possible. If the staff member is in any doubt, advice can be sought from the trust's confidential counselling hotline through 'Wisdom' or [Protect](#) who offer a confidential helpline.

Where a concern relates to the immediate safety or welfare of a child, staff should follow the school's child protection policy and speak to the relevant designated safeguarding lead (DSL) without delay, in addition to using this whistleblowing procedure.

5. Procedure for responding to a whistleblowing concern

5.1 Investigating the concern

When a concern is received by the headteacher/CEO/director, '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. The companion must respect the confidentiality of the disclosure and any subsequent investigation
- Get as much detail as possible about the concern at this meeting and record the information. The staff member will be provided with a copy of the written summary of the concern after the meeting
- If it becomes apparent that the concern is not of a whistleblowing nature, the recipient should handle the concern in line with the appropriate policy and/or procedure and inform the staff member accordingly
- Reiterate, at this meeting, that they are protected, by law, 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 6 of this policy)
- Establish whether there is sufficient cause for concern to warrant further investigation. If so:
 - The recipient should then arrange a further investigation into the matter, involving other staff, governors or directors, if appropriate. In some cases an external, independent body, with relevant experience, sufficiently independent of the matter being investigated, may be appointed to support or conduct the investigation.
 - The investigator (or investigators) may make recommendations for change to enable the board to minimise the risk of future wrongdoing. 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. The person who raised the concern may also be required to attend additional meetings in order to provide further information
- Within 10 working days, excluding periods of school closure, of a concern being raised. The recipient will write to the complainant to:
 - Acknowledge that the concern has been received
 - Indicate how the matter is to be dealt with
 - Give an estimate of how long it will take to provide a final response, informing the complainant as to whether any initial enquiries have been made
 - Tell the staff member whether further investigations will take place and if not, why not where able. Sometimes, there may be a need for confidentiality that may prevent the board giving the staff member specific details of the investigation, an outcome or any disciplinary action taken as a result. In any event, any information about the investigation must be treated as confidential
 - Provide regular progress updates where investigations are prolonged

Throughout any investigation, wellbeing check-ins for both the complainant and the subject(s) of a concern will be undertaken by the People Team. Where appropriate, support and signposting to manage expectations, protect emotional wellbeing and maintain professional confidence will be offered.

Where a concern relates to safeguarding, the relevant DSL will be informed and involved in decision-making where suitable, and appropriate referrals to external agencies (such as children's social care or the police) will be considered.

5.2 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 (LA) 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 CEO, directors and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

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

If a staff member is not satisfied with the way in which their concern has been handled, they can raise their concerns with one of the contact points listed in section 4.2.

The board will maintain a secure confidential whistleblowing register, recording; date received, nature of concern, investigator appointed, outcome, actions taken, date closed.

6. Malicious or vexatious allegations

Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made with the reasonable belief that the disclosure is in the public interest and meets the definition of whistleblowing as listed in section 3, 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 board will consider whether any disciplinary action is appropriate against the person making the allegation.

7. Escalating concerns beyond the trust

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases the staff member should not find it necessary to alert anyone externally. As such, the board encourages staff to raise their concerns internally, in line with section 4 of this policy, but the board and the law recognise that in some circumstances staff may feel the need to report concerns to an external body such as a regulator. A list of prescribed bodies to whom staff can raise concerns with is included [here](#).

It will very rarely, if ever, be appropriate to alert the media. It is strongly advised that staff seek advice before reporting a concern to an external body. The Protect advice line, linked to in section 3 of this policy, can help staff when deciding whether to raise the concern to an external party. They operate a confidential helpline and they also have a list of prescribed regulators for reporting certain types of concern.

Whistleblowing concerns usually relate to the conduct of staff but they may sometimes relate to the action of a third party. In some circumstances the law will protect the staff member raising the concern if they raise the matter with the third party directly. However, the board encourages staff members to report such concerns internally first, in line with this policy.

Where concerns relate to safeguarding practice in the organisation, staff may also consider contacting the local authority designated officer (LADO), children's social care directly, or the NSPCC whistleblowing advice line on 0800 028 0285 or via email help@NSPCC.org.uk.

8. Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. The trust aims to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a staff member believes that they have suffered any such treatment, they should inform the People Team immediately. If the matter is not remedied, they should raise it formally using the trust's Grievance Resolution policy and procedure.

The staff member must not threaten or retaliate against whistleblowers in any way. Any employee who retaliates against or victimises a whistleblower may be subject to disciplinary action.