ACHIEVING TOGETHER

# FOUR STONES GATEWAY TRUST

# WHISTLEBLOWING POLICY

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| DATE POLICY WAS APPROVED | 01.07.2026 |
| DATE POLICY WILL BE REVIEWED | Summer 2027 |
| MEMBER OF STAFF WITH RESPONSIBILTY FOR REVIEW | Head of People |

**Key Definitions**

All policies incorporate the following schools or organisations within Four Stones Gateway Trust ('the Trust'):

- Clee Hill Community Academy
- Cleobury Mortimer Primary School
- Haybridge High School and Sixth Form
- Haybridge Teaching School Hub
- Haybridge SCITT
- King Charles I School
- Lacon Childe School
- SHaW (Shropshire, Herefordshire, and Wolverhampton) Maths Hub
- Stottesdon CofE Primary School
- TDMS (The De Montfort School)
- Any other schools or organisations that may join the Trust from time to time and not listed above.

The terms Academy, School, Organisation and Trust are considered interchangeable in the context of all Trust policies.

Where appropriate, in this Policy the term:

**"CEO"** includes the Chief Executive Officer

**"CFOO"** includes the Chief Financial Officer

**"Trust Senior Leadership Team"** includes Executive Headteachers, Headteachers, strategic operational leads and Teaching School/SCITT Directors.

**"Headteacher"** includes the appropriate School Headteacher.

**"Trustees or Trust Board"** are appointed Trustees who oversee the business of Four Stones Gateway Trust, agreeing the overarching strategic direction and ensuring robust governance.

**"Local Academy Boards (LAB)"** are appointed Governors at a local level. LAB Governors act as advocates for their school's Safeguarding, SEND, Standards and Stakeholder engagement.

**"Chair"** responsible for leading the board and ensuring its effectiveness.

**"Stakeholders"** are any individuals or companies who are invested in the welfare and success of the Trust and/or School and its students, including staff members, students, parents, community members, LAB or Trust members, trade unions, local business leaders etc.

## Introduction

People working within an organisation are often the first to realise that there may be something seriously wrong in the place that they work. Four Stones Gateway Trust ( the Trust) is committed to the highest possible standards of openness, honesty, and integrity. In line with that commitment, we encourage staff who have serious concerns about the schools in the Trust to come forward and voice those concerns about specified matters.

## Purpose and Scope

The aims of this Policy are:

- To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide staff with guidance on how to raise concerns.
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- To commit to treating all disclosures consistently and fairly.

This Policy applies to all staff of the Trust, governors, consultants, contractors, casual and agency staff, and volunteers (collectively referred to as staff in this Policy).

While this policy applies to volunteers and other non-workers, legal whistleblowing protection under the Employment Rights Act 1996 may not apply to all individuals (e.g. volunteers). However, the Trust will treat all disclosures consistently and protect individuals from detriment wherever possible.

The Exams Whistleblowing Policy is to be read in line with this Policy.

Protection under whistleblowing law applies from the first day of engagement, with no minimum service requirement.

This Policy does not form part of your employment contract and the Trust may update it at any time in consultation with Trade Unions.

The Trust Board is responsible for ensuring the operation of this Policy with regard to matters relating to the schools in the Trust.

## What is Whistleblowing?

Whistleblowing is ‘making a disclosure in the public interest’ and occurs when a concern is raised (i.e. someone ‘blows the whistle’), about a certain type of wrongdoing, danger or illegality that affects others, for example members of the public. The disclosure may be about the alleged wrongful conduct of the employer, a colleague, client, or any third party. Typically, the whistleblower is not directly, personally affected by the danger or illegality, although they may be.

The law provides protection for workers who raise legitimate concerns about specified matters or "qualifying disclosures". A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that there are wrongdoing or dangers at work. This may include:

- that a criminal offence has been committed, is being committed or is likely to be committed;
- that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject;
- that a miscarriage of justice has occurred, is occurring or is likely to occur;
- that the health and safety of any individual has been, is being or is likely to be endangered;
- that the environment has been, is being or is likely to be damaged; or
- that information tending to show any matter falling within any of a) to e) above has been or is likely to be deliberately concealed.

## What are "Protected Disclosures"?

By law you will be protected as a whistleblower if you can show it’s reasonable for you to believe that what you disclose:

- fits into one of the categories of a qualifying disclosure.
- is in the public interest.

In the public interest means it has to also affect others. For example, other staff, customers, or the general public. A problem or grievance that is personal to only you is unlikely to count as being in the public interest. Something is more likely to be in the public interest:

- the more serious the issue is.
- if you're reporting something that was done deliberately
- if the issue involves a large, influential, or well-known employer.
- if there are a large number of people affected by the concerns

It is not necessary for staff to have proof that such an act is being, has been, or is likely to be, committed - a **reasonable belief** is sufficient. The employee has no responsibility for investigating the matter - it is the Trust's responsibility to ensure that an investigation takes place.

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this Policy.

Personal complaints such as harassment or discrimination may constitute whistleblowing where they are in the public interest, including concerns about sexual harassment, systemic issues, or a failure to prevent such conduct.

Where a concern is raised under this Policy but is subsequently assessed as being more appropriately dealt with under another procedure (for example, the Grievance Policy, or the Fairness and Dignity Policy), the Trust will advise the individual, and where appropriate, direct or support them to use the correct process. Similarly, where a concern is initially raised through another procedure but is found to constitute a whistleblowing disclosure, it will be managed under this Whistleblowing Policy and the individual will be informed accordingly.

If you are uncertain whether something is within the scope of this Policy, you should seek advice from a member of the Trust's Senior Leadership Team.

If your concern is in relation to safeguarding and the welfare of students at a school in our trust, you should consider whether the matter is better raised under the school's Safeguarding and Child Protection Policy or Managing Allegations Policy and in accordance with the arrangements for reporting such concerns, i.e. via the designated safeguarding lead, although the principles set out in this Policy may still apply.

**Harassment or Victimisation**

The Trust recognises its duty under the Worker Protection (Amendment of Equality Act 2010) Act 2023 to take reasonable steps to prevent sexual harassment. Concerns raised under this policy will inform preventative action, risk assessment, and organisational learning.

The Trust recognises that the decision to report a concern can be a difficult one to take, not least because of the fear of reprisal from those responsible for the malpractice or from the schools in the Trust. The Trust will not tolerate any such harassment or victimisation and will take appropriate action to protect those that raise a concern in good faith. In addition the Public Disclosure Act offers protection to employees from suffering a detriment and dismissal when they have 'blown the whistle'.

**Anonymous Allegations**

Concerns expressed anonymously, may be considered under this whistleblowing procedure, especially those relating to the welfare of children. The Trust, when determining whether an anonymous allegation will be investigated further, will take the following factors into account:

- The seriousness of the issue raised.
- The credibility of the concern
- The likelihood of obtaining the necessary information in order to confirm the allegation.

**Safeguarding Issues**

If the concern relates to a safeguarding issue, you should follow the process outlined in the 'Safeguarding Policy.' However, if you are concerned about the Trusts response or are still concerned about the situation then you should contact the Family Front Door on 01905822666. You can also contact the NSPCC

whistleblowing helpline at 0800 028 0285 or email at help@nspcc.org.uk If you believe a student or young person is at immediate risk of harm, then you should contact the police.

**Deliberately False or Malicious Allegations**
The Trust will consider any deliberately false or malicious allegations it receives as a disciplinary matter.

**Raising a Whistleblowing Concern**
If wrongdoing in the workplace is suspected:
- **Do not** approach or accuse the individual directly;
- **Do not** try to investigate the matter;
- **Do not** convey such suspicions to anyone else other than those with the proper authority but do raise your concern (see below).

We hope that you will be able to raise any concerns with your immediate line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.

However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, or they are the subject of the complaint, then you can raise the matter with:
- Chair of Trustees
- Chief Finance and Operations Officer. This is the member of the Trust senior leadership team who is responsible for managing whistleblowing complaints.
- The Headteacher of your school.
- The Chair of the Local Governing Body or Local Academy Board at your school
- A member of the People Team

Any staff member can by-pass the direct management line, and the Trust Board, if they feel the management and/or governors of a school or the management and/or trustees of the Trust is engaged in an improper course of action. In this case, please refer to the section external bodies in this Policy.

Although concerns may be raised verbally, they are better put in writing. When setting out your concern in writing you should include as much detail as possible, for example, set out the background and history of the concern; giving names, dates and places and explaining the reasons for your concerns. It is not necessary for staff to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient.

An instruction to cover up wrongdoing is in itself a disciplinary matter. If you are told not to raise or pursue any concern, even by a person in authority, you should not agree to remain silent. You should report the matter in accordance with the 'raising a whistleblowing concern' section of this Policy.

**Our Response**
It is expected that an appropriate Investigating Officer from within the Trust will be appointed to respond to your concern.

In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. We may in some circumstances, appoint a Trustee or an external person or body to investigate the concern.

Initially the Investigating Officer will consider the matter raised and decide whether an investigation is appropriate and if so, what form it should take. It may be appropriate for the investigating officer to initially consider other procedures such as the Allegations of Abuse against Teachers and other Staff (in cases of safeguarding) and immediately contact the Local Authority Safeguarding in Education Adviser for advice. If the concern is unrelated to a qualifying disclosure, then the Investigating Officer should halt the use of this procedure and instead refer the employee to the grievance and harassment or other relevant procedure.

**Written Acknowledgement**
Once the Investigating Officer has considered the issue(s) they will aim to write to you within 10 working days of the concern being raised:

- acknowledging that the concern has been received;
- indicating how they propose to deal with the matter;
- giving an estimate (so far is reasonably practical) of how long it will take to provide a final response;
- advising whether any initial enquiries have been made;
- advising whether further enquiries will take place;
- informing you of any support available whilst matters are investigated; and
- maintaining confidentiality where possible, but explaining that it may not be possible that you remain anonymous due to the need for a thorough investigation.

**The Investigation Process**

The Investigating Officer may decide it is necessary to meet with you to seek further information or for clarification purposes. Where a meeting is arranged you have the right to be accompanied by a trade union representative or a colleague who is not involved in the matter(s) of concern. The Investigating Officer may also feel it is necessary to collect further evidence and interview witnesses as part of the investigation process.

During the investigation process the Investigating Officer may feel it is appropriate to refer matters to:

- the DfE (was ESFA- Education & Skills Funding Agency) due to concerns about financial loss or irregularity; or
- the Police, due to concerns of a criminal nature; or
- the Local Authority Safeguarding in Education Adviser or Local Authority Designated Officer (LADO) in relation to safeguarding concerns.

The investigation process would aim to be completed within 20 working days of the matter being raised with the Investigating Officer, However, enquiries may extend beyond this timescale in some more complex cases.

**Possible Outcomes**

Following the investigation process the Investigating Officer will write up their findings and recommendations and present them to the relevant person(s) in the form of a report. The Investigating Officer will determine that either:

a) there is no evidence to support the matters raised and no further action is required; or
b) allegations have been proven and that it is appropriate to take action in accordance with the disciplinary procedure or other relevant action; or
c) the outcome is currently unknown because matters have been referred to other parties for further investigation e.g. police, audit, social services, legal, DBS etc; or
d) the allegation is found to be malicious and will be investigated as a conduct issue under the disciplinary procedure.

The Trust will take appropriate steps to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, the Trust will arrange for you to receive advice about the procedure.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation, an outcome or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

There is no internal right of appeal against the outcome of a whistleblowing investigation. If you are dissatisfied with the outcome of the internal investigation, you retain the right to report your concerns externally to an independent oversight body or a prescribed regulatory authority.

**External Disclosures**

The aim of this Policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media.

We strongly encourage you to seek independent advice before reporting a concern to anyone external. But you could raise your concern to any of the following (this list is not exhaustive):

- Protect holds a list of prescribed regulators for reporting certain types of concern Protect - Speak up stop harm - Whistleblowing Homepage
- A recognised trade union or professional association
- A solicitor
- Public Health England
- Proper external regulator Whistleblowing: list of prescribed people and bodies - GOV.UK

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a contractor, supplier, or service provider. In some circumstances the law will protect you if you raise a concern with the third party directly where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the other individuals set out in the section raising a concern above for guidance.

**Confidentiality and Data Protection**

We hope that staff will feel able to voice whistleblowing concerns openly under this Policy. However, if you want to raise your concern confidentially, we commit to making every reasonable effort to keep your identity secret but we cannot guarantee absolute anonymity in all cases.

In all cases we will take reasonable steps to protect a whistleblower's identity wherever possible. This may include where appropriate limiting access to the whistleblower's details to only those who need to know, and using secure, confidential channels for communication. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you before an investigation is begun.

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the other contact points listed in the raising a concern section above and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline.

Where we receive anonymous complaints, we will investigate the complaints as far as is reasonable taking into account:

- the seriousness of the issue raised.
- the credibility of the concern; and
- the likelihood of confirming the allegation from other sources

As part of the application of this Policy, the Trust may collect, process and store personal data in accordance with our Data Protection Policy. We will comply with the requirements of Data Protection Legislation (being the UK General Data Protection Regulation and Data Protection Act 2018) and any implementing laws, regulations, and secondary legislation, as amended or updated from time to time in the collecting, holding, and sharing of information in relation to our workforce. Records will be kept in accordance with our Data Protection Policy and in line with the requirements of Data Protection Legislation.

**Training and Awareness**

We are committed to ensuring that all staff and managers understand their rights and responsibilities in relation to this Policy and wider whistleblowing law. To support this we will provide all staff with appropriate regular training as part of our mandatory training calendar.