



engage enrich excel academies

Whistle Blowing Policy 2026-2028

Date of Approval

12 June 2026

HR Committee

Date of Review

Summer 2028

HR Committee

Related Policies

- Anti-Bullying & Harassment Policy
- Capability & Disciplinary Policy
- Grievance Policy

Engage Enrich Excel Academies

Registered Office: 181 Frimley Road South Camberley Primary & Nursery School Junior Site, Camberley, Surrey. GU15 2QB
Company Registration Number 9279884 (England and Wales)

1. Introduction & Purpose of Policy

All Schools in Engage Enrich Excel Academies (EEEE) are committed to the 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 openly and effectively managed, and that the school's integrity and the principles of public interest disclosure are sustained. As a trust the EEEA believes that every member of staff should have the freedom to speak up about concerns that they have.

In line with that commitment, all members of staff, supply staff, volunteers and those working on behalf of the school and others we deal with who have serious concerns about any aspect of the school's work are encouraged to come forward and voice those concerns. As a first step, a member of staff should normally raise concerns with his/her immediate line manager, the Headteacher or the School's Designated Safeguarding Lead Officer (DSL) where this is appropriate to the nature of the concern. If the allegations involve the Headteacher, the member of staff should raise the matter with the Chair of Governor's. Staff not only have the right but also a duty to report any improper actions or omissions, particularly where the welfare of young people may be at risk. Where any member of staff decides to report a serious incident within the scope of this policy, whether anonymously or otherwise, this will be treated as a 'protected' internal disclosure. Staff members should feel reassured that they can raise concerns in accordance with this policy without fear of victimisation, subsequent discrimination, adverse repercussions or disadvantage.

This policy aims to:

- Encourage staff to feel confident in raising serious concerns and to question and act upon concerns about practice;
- Provide avenues to raise those concerns and receive feedback on any action taken;
- Ensure that staff receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied;
- Reassure staff that they will be protected from possible reprisals or victimisation if they have made any disclosure in good faith.

The Trust Board is mindful of its obligations under the Equality Act 2010 and this policy will be applied fairly and consistently to all staff employed at the school as well as those carrying out work for the school, for example, governors, volunteers, agency workers, contractors or consultants. The term 'member(s) of staff' is used in this document for simplicity but is intended to include this broader range of individuals covered by this policy. Copies of this policy, are available to all members of staff via the Trust Website (<https://www.eeea.co.uk/>) or can be obtained from the local Business Manager or member of the Central Team.

2. Scope of the Policy

There are existing procedures in place to enable employees to lodge a grievance relating to their own employment. The whistle blowing policy is intended to cover serious concerns that may fall outside the scope of other procedures, in accordance with the Public Interest Disclosure Act 1998. These include:

- Conduct which is an offence or a breach of law
- Failure to comply with a legal obligation
- Disclosures related to miscarriages of justice
- Health and safety risks, including risks to the public or pupils as well as other staff
- Damage to the environment
- Information relating to the above issues that has been, or is likely to be, deliberately concealed
- Failure to meet a professional requirement.

Examples of the above categories are likely to include:

- The unauthorised use or misuse of public funds
- Possible fraud and corruption
- Sexual, physical or psychological abuse of pupils at the school
- Harassment & bullying of staff
- Sexual harassment (including reports that it has occurred, is occurring, or it likely to occur); please see below.
- Breaches of codes of conduct
- Malpractice in examinations and assessments.

Therefore, any serious concerns that a member of staff has about any aspect of the school's service provision or the conduct of staff or others connected with the school can be reported under this whistle blowing policy where that member of staff has a reasonable belief in the validity of those concerns and they relate to one of the specified areas set out above.

A member of staff who makes such a protected internal disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because he/she has made a disclosure.

All whistle blowers are afforded the same protection, and members of staff must not threaten others who have raised concerns or carry out reprisals against them. The school may take disciplinary action which could include dismissal for gross misconduct, against any members of staff taking such action. Such members of staff may also face legal action from the whistleblower in these circumstances.

If a member of staff has a complaint about the way people are behaving towards them then they should refer to the Trust's Grievance Policy for guidance on how to proceed.

3. Key Points About Raising Concerns

3.1 Sexual Harassment

Disclosures relating to sexual harassment, made on or after 6 April 2026 may amount to a protected disclosure.

Sexual Harassment is something separate to sex (i.e. female or male) harassment. Sexual harassment occurs when someone is subjected to unwanted conduct of a sexual nature or when a person is treated less favourably because they have accepted or rejected unwanted conduct of a sexual nature. The conduct need not be sexually motivated; it only needs to be sexual in nature.

If a worker reasonably believes that sexual harassment has occurred, is occurring, or is likely to occur, and reports this in the public interest, they can benefit from whistleblowing protections, even if the concern is not yet substantiated at the time it is raised.

Sexual interaction that is invited, mutual or consensual is not sexual harassment (because it is not unwanted), but situations change and sexual conduct that has been consensual in the past may become unwanted.

A person can experience unwanted conduct from someone of the same or a different sex.

Examples of sexual harassment may include:

- sexual comments or jokes;
- suggestive looks, staring or leering;
- propositions and sexual advances;
- making promises in return for sexual favours;

- sexual gestures;
- intrusive questions about a person's private or sex life or a person discussing their own sex life;
- sexual posts or contact on social media or online;
- spreading sexual rumours about a person;
- sending sexually explicit emails or text message;
- unwelcome touching, hugging, massaging or kissing;
- suggestive behaviour or suggestions that sexual favours may further a career or that a refusal may hinder it;
- sending or displaying sexually graphic pictures, posters or photos (including by way of e-mail, text messages, video clips and images sent by mobile telephone or posted on the internet).

There may be overlap between grievance investigations and whistleblowing procedures where concerns regarding sexual harassment have been raised.

We will ensure concerns are accurately categorised and handled under the appropriate process to ensure compliance with legal protections and to support those reporting concerns.

If you are uncertain whether something is within the scope of this policy or our Anti-Bullying & Harassment Policy, you should seek advice from the Headteacher or CEO.

3.2 Safeguarding Against Harassment or Victimisation

It is recognised that the decision to report a concern can be a difficult one to make. The school will take a zero-tolerance approach to any act of harassment or victimisation (including informal pressures) resulting from a member of staff raising a concern in good faith, and will handle any such allegations in accordance with the School's Grievance Procedure.

A member of staff making an allegation within the scope of this policy will be supported by the school when raising a concern, providing that he/she:

- Discloses the information in good faith
- Believes the concern to be true
- Is not acting maliciously or making false allegations
- Is not seeking any personal gain; and
- The allegation relates to one of the categories of concerns set out in Section 2 above.

3.2 Unsubstantiated Allegations

If a member of staff makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, an allegation is made frivolously, maliciously or for personal gain, disciplinary action is likely to be taken.

3.3 Confidentiality

All concerns will be treated in confidence but, at the appropriate time, the whistle blower may be asked to come forward as a witness and this will be discussed with him/her.

3.4 Anonymous Allegations

This policy encourages staff to put their name to their allegation wherever possible. The school will take all concerns raised seriously. Concerns expressed anonymously are much less powerful but will still be given consideration at the discretion of the Local Advisory Committee. In exercising this discretion, the Local Advisory Committee would consider the seriousness of the issues raised, the credibility of the concern and the likelihood of confirming the allegation from sources which can be attributed.

4. How to Raise a Concern

As a first step, a member of staff should normally raise concerns with his/her immediate line manager, the Headteacher or the School's Designates Safeguarding Lead Officer (DSL) where this is appropriate to the nature of the concern. If the allegations involve the Headteacher, the member of staff should raise the matter with the Chair of the Governors.

While the School encourages members of staff to raise their concerns internally, the school also recognises that some staff may feel unable to do this and that they may therefore wish to contact an individual or organisation independent of the school. The whistle blower can contact the Trust's CFOO, nominated director, trade union/professional association or the Education & Skills Funding Agency as relevant to the nature of the concerns.

Concerns may be raised verbally or in writing, but the earlier the concern is expressed the easier it is to take any required action. A member of staff raising concerns should state that they are raising those concerns under this policy. Members of staff who wish to make a written report are encouraged to include the following information:

- The background and history of the concern, giving relevant dates and providing as much detail and supporting evidence as possible;
- The reason(s) why they are particularly concerned about the situation.

Where a concern is raised verbally, the person hearing it must ensure that a written account of it is made to assist with any subsequent investigation.

School management will take all concerns raised within the scope of this policy seriously and identify the appropriate level of investigation. Concerns will be considered fully, objectively and confidentially and the school will recognise that raising a concern can be a difficult experience for employees. Staff members who are under investigation will not be involved in the investigation. Advice and guidance will be obtained as necessary from the School's Personnel Consultant.

The whistle blower may invite a recognised trade union representative or a work colleague to be present during any meetings or interviews held in connection with the concerns raised. If the whistle blower brings a companion, it is implied that both the whistle blower and their companion agree to keep any disclosures confidential before and after the meeting or interview and during any investigation that may follow.

The school will take steps to minimise any difficulties which may be experienced as a result of raising a concern. For example, if a member of staff is required to give evidence in criminal or disciplinary proceedings, the school will arrange for them to receive appropriate procedural and/or legal advice.

A further option for members of staff who wish to raise concerns is to contact Protect (formerly Public Concern at Work) which offers an independent and confidential helpline on 020 3117 2520.

5. How We Will Respond

5.1 Initial Enquiry

In order to protect the individuals involved, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take and who should be appointed to conduct it. The overriding principle is that of the public interest. If urgent action is required, for example if the welfare of pupils may be at risk, this action will be taken before any investigation is conducted.

Further to the results of this enquiry, the following steps will be considered:

- Concerns or allegations which fall within the scope of specific procedures, e.g., child protection, bullying or harassment or disciplinary, will normally be referred for investigation and consideration under those procedures.
- Where there are any concerns about financial impropriety or criminal activity, the concern will be referred to the board of Trustees before taking any other action, which may include reporting to the police.
- Concerns indicating unlawful activity should be reported to the Trustees.
- Suspected incidents of malpractice relating to examinations will be reported to the appropriate awarding body at the earliest opportunity.
- In other cases, an impartial investigator may be appointed and the school will seek advice from the COO of the Trust or the CEO.
- If the initial enquiries involve the headteacher the chair of governors will seek advice from the CEO to decide who will conduct the investigation.

5.2 Communication

Within ten working days of a concern being raised, the person who is dealing with the concern will respond in writing directly. The response will:

- Acknowledge receipt of the concern
- Indicate how the school proposes to deal with the matter
- Give an estimate of how long it will take to provide a final response
- Advise whether any initial enquiries have been made
- Supply information on any staff support mechanisms (e.g., EAP), and
- Advise whether further investigation or action is required, and if not, why not.

A further update will also be provided 28 days after the concern was received, advising of additional progress made and the estimated date a final response will be available. If the whistle blower has chosen to remain anonymous and non-contactable, they will need to use their original contact route in order to receive updates.

5.3 Investigation

Once preliminary enquiries have established the need for an investigation, an appropriate person will be appointed to conduct the investigation (section 5.1). The person appointed to undertake the investigation is responsible for establishing the facts of the matter, as far as it is reasonably possible to do so, and assessing whether the concern has foundation and can be resolved internally. Other people may need to be interviewed to provide further information and/or clarification concerning the issue(s) raised.

Written records of all interviews will be kept throughout the investigation together with details of any action taken. The investigation will result in a written report and recommendations for corrective action, which will be passed to the Headteacher and/or the CFOO and /or the nominated Trustee of EEEA, as appropriate to the concerns under consideration, to determine whether formal action shall be taken.

The member of staff raising the concern will, subject to legal constraints, be advised in writing of the outcome of the investigation and, where appropriate, what action is being taken. This may, for example, include changes to working practices to ensure that a similar situation does not occur again.

6. Taking the Matter Further

This policy is intended to provide members of staff with an avenue to raise concerns internally. If the member of staff feels that it is right to take the matter outside the school, contact can be made with a recognised trade union, local Citizens Advice Bureau, relevant voluntary or independent organisation or legal advisor. The Public Interest Disclosure Act also sets out a

number of bodies to which protected disclosures can be made, including HM Revenue & Customs, the FSA, Protect (formerly Public Concern At Work) the Health and Safety Executive and the Serious Fraud Office. Employees should be aware that going directly to the press may limit their protection under the Public Interest Disclosure Act and they could therefore be subject to disciplinary action. An employee considering such a course of action is strongly advised to seek prior advice from their trade union or an independent organisation. Alerting the media to a concern – particularly during an internal investigation – is almost never justified or appropriate in any situation. The school strongly discourages members of staff from doing so, and will treat any contact with the press as a serious disciplinary issue justifying possible dismissal unless exceptional circumstances exist. The school would normally have expected members of staff to have taken all reasonable steps to deal with the matter internally or with an external regulator, and to have taken full advice from a lawyer or Protect (formerly Public Concern At Work) before being justified in approaching the press.

7. Monitoring & Reporting

The EEEA is responsible for overseeing the operation of this policy and for ensuring that appropriate records are maintained regarding concerns raised and the outcomes. It is also responsible for reporting concerns to officers at Surrey County Council, Hampshire County Council and to other external bodies as appropriate to the circumstances.

8. Further Information

Additional Contact Details:

Nominated Trustee: Graham Wolfe, Trustee, GWolfe@eeea.co.uk

Nominated Trust Member of Staff: Ali Larcombe-Fish, CFOO, ALFish@eeea.co.uk

Department for Education

To complain or make a disclosure about an academy trust, please see [Blowing the whistle to the Department for Education - GOV.UK](#)

ICO

Breach of data protection or freedom of information legislation as a whistle blower. <https://ico.org.uk/make-a-complaint/protection-for-whistleblowers-guidance/report-as-a-whistleblower/>

9. Version Control

Date	Version	Approved by	Amendment Summary
12/06/26	2026-2028	HR	- Sexual Harassment section added - Contacts updated