



Inspire Education Trust

Together we achieve, individually we grow

Whistleblowing Policy

Policy Date: October 2025

Review Date: October 2027

Document History

Version	Status	Date	Author	Summary Changes
V1	New Draft	May 2021	Jane Durkin	
V2	Review and update	April 2022	Lois Whitehouse	<p>Checked compliance with latest legal guidance and Model Policy from the Key. Several updates made throughout:</p> <p>3.2 – included in policy</p> <p>4.1.9 – removal of <i>"breach of our internal policies and procedures including our Code of Conduct"</i></p> <p>4.1.10 removal of conduct likely to damage our reputation <i>"or financial wellbeing"</i>;</p> <p>5 – amended for succinct process</p> <p>7.2 – inclusion of external advice and support network</p> <p>8 – added to the policy</p> <p>9.2 - Changed to Board of Directors from Chair of LGC</p> <p>10 – removal of this point</p> <p>11.3 – removal of this point</p> <p>13 – updated contact for Rob Darling. Added CEO contact info.</p>
V3	Review and update	Oct 23	Lois Whitehouse	<p>Amendments to 5.3/ 5.4/ 5.4/ 5.6 to include all ELT and those with a lead role and to show a clear route of reporting concerns with the addition of the DDE.</p> <p>Amendment to contacts in Section 12 – removal of Chair of FARC, addition of DDE, amendment to counselling provider.</p>
V4	Review and update	Oct 25	Josh Smith	<p>3.3 – Clause added relating to new protected disclosure laws</p> <p>4.4 – amended to Dignity at Work Policy</p> <p>5.1 – added 'and/or Headteacher or Head of Central Function'</p> <p>5.2 – amended to 'the manager'. Added Executive Headteacher or any members of the Executive Leadership Team'</p> <p>5.3 – amended to 'a member of the ELT'</p> <p>6.3 – Data protection section updated</p> <p>12 – Contacts moved to become Appendix 1. Chair of Trust Board email address included. Contacts updated/removed where applicable.</p>

V4.2	Updated following Board Review	Nov 25	Josh Smith	1.2 – added 'The whistleblowing policy' Section 2 added 'To' for consistency to prefix items listed Amended language throughout policy to ensure consistency and avoid 'first-person' language
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1 Introduction

- 1.1 The Board is committed to the highest possible standards of honesty and integrity, and we expect all staff to maintain these standards in accordance with our Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.
- 1.2 The Whistleblowing Policy has been formally adopted by the Trust Board.

2 Scope and Purpose

- 2.1 The aims of this policy are:
 - 2.1.1 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.
 - 2.1.2 To provide staff with guidance on how to raise concerns.
 - 2.1.3 To set clear procedures for how the Trust will respond to such concerns.
 - 2.1.4 To let all staff know the protection available to them if they raise a whistleblowing concern.
 - 2.1.5 To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue).
- 2.2 This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 2.3 This policy applies to all employees or other workers of the Trust i.e. governors, consultants, contractors, casual and agency staff and volunteers (collectively referred to as staff in this policy) in any capacity including self-employed consultants or contractors who provide services on a personal basis and agency workers.

3 Legislation

- 3.1 The requirement to have clear whistleblowing procedures in place is set out in the [Academy Trust Handbook](#).

- 3.2 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](#).
- 3.3 Recent updates to whistleblowing legislation have expanded the scope of protected disclosures under the Public Interest Disclosure Act 1998. These now include concerns relating to sanctions-related misconduct (e.g. breaches of financial, trade, or transport sanctions). Additional prescribed persons have also been added, such as HM Treasury and the Secretaries of State for Business & Trade and Transport, for disclosures relevant to their areas of oversight. The Trust will ensure that any disclosures falling within these categories are treated in accordance with the law and referred to the appropriate external body where necessary.

4 What is whistleblowing?

- 4.1 'Whistleblowing is the raising of a concern, either within the workplace or externally, about a danger, risk, malpractice or wrongdoing which affects others. It is referred to in law as 'making a protected disclosure'. It has a specific legal definition under the Public Interest Disclosure Act 1998 ("PIDA") i.e. "a disclosure of information which, in the reasonable belief of the employee, is made in the public interest and tends to show serious misconduct".
- 4.2 The law provides protection for whistleblower who raise legitimate concerns about specified matters or "qualifying disclosures". A qualifying disclosure may relate to:
- 4.2.1 Criminal activity (e.g. fraud, corruption or theft);
 - 4.2.2 Miscarriages of justice;
 - 4.2.3 Danger to health and safety (e.g. the use of unsafe equipment)
 - 4.2.4 Damage to the environment (e.g. a chemical spillage);
 - 4.2.5 Failure to comply with any legal or professional obligation or regulatory requirements (e.g. knowingly employing illegal immigrants);
 - 4.2.6 Bribery;
 - 4.2.7 Financial fraud or mismanagement (e.g. false returns to HM Revenue & Customs);
 - 4.2.8 Negligence;
 - 4.2.9 Breach of IET's internal policies and procedures;
 - 4.2.10 Conduct likely to damage IET's reputation;
 - 4.2.11 Unauthorised disclosure of confidential information;
 - 4.2.12 Other unethical behaviour;
 - 4.2.13 The deliberate concealment of any of the above matters.
- 4.3 A whistleblower is a person who raises a genuine concern relating to any of the above. If the whistleblower has any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) they should report it under this policy.
- 4.4 This policy should not be used for complaints relating to an individual's personal circumstances, such as the way they have been treated at work. In those cases, the whistleblower should use the Grievance Procedure or Dignity at Work Policy as appropriate.

- 4.5 If the whistleblower is uncertain whether something is within the scope of this policy, they should seek advice from a member of the Trust's leadership team.
- 4.6 If the concern is in relation to safeguarding and the welfare of pupils/students at the academy, the complainant should consider whether the matter is better raised under the academy's Safeguarding and Child Protection Policy and in accordance with the arrangements for reporting such concerns, i.e. via the Designated Safeguarding Lead, although the principles set out in the is policy may still apply.

5 Raising a whistleblowing concern

- 5.1 Concerns should be raised to the attention of the line manager and/or Headteacher or Head of Central Function in the first instance where appropriate. This can be either in person or in writing if preferred. The complainant and the line manager may be able to agree a way of resolving the concern quickly and effectively.
- 5.2 However, where the matter is more serious, or if it is felt that the manager has not addressed the concern, or the complainant prefers not to raise it with them for any reason, or they are the subject of the complaint, then the matter can be raised with an Executive Headteacher or any other members of the Executive Leadership Team.
- 5.3 If the concern is about a member of the Executive Leadership Team or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the Chief Executive Officer or Chair of the Inspire Education Trust Board of Directors.
- 5.4 If the concern relates to the CEO then this should be raised with the Chair of the Inspire Education Trust Board of Directors.
- 5.5 If the employee making the disclosure is unhappy about the outcome of the investigation they can report their concern to the CEO or to the Chair of the Inspire Education Trust Board of Directors.
- 5.6 Alternatively, if the whistleblower considers the matter too serious or sensitive to raise within the internal environment of the Trust, the matter should be directed in the first instance to the Coventry Diocesan Director of Education.
- 5.7 Contact details are set out at the end of this policy.
- 5.8 Concerns should be made in writing wherever possible. They should include names of those 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.

6 Confidentiality and Data Protection

- 6.1 The Trust does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from the person/s

raising the concerns. 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 paragraph 4.2 and appropriate measures can then be taken to preserve confidentiality. If they are in any doubt, they can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are given at the end of this policy.

- 6.2 Where the Trust receives anonymous complaints, the Trust will investigate the complaints as far as is reasonable taking into account:

6.2.1 the seriousness of the issue raised

6.2.2 the credibility of the concern; and

6.2.3 the likelihood of confirming the allegation from other sources

- 6.3 As part of the application of this policy, The Trust will collect, process and store personal data in accordance with our data protection policy. The data will be held securely and accessed by, and disclosed to, individuals only for the purposes of completing the procedures as set out in this policy. Records will be kept in accordance with our Workforce Privacy Notice, our Retention and Destruction Policy and in line with the requirements of Data Protection Legislation (being the UK General Data Protection Regulation, the Data Protection Act 2018 and the Data Use and Access Act 2025) and any implementing laws, regulations and secondary legislation, as amended or updated from time to time. Any breach of data protection may constitute a disciplinary offence and be dealt with under this procedure.

7 External Disclosures

- 7.1 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](#).
- 7.2 The Protect (formerly Public Concern at Work) advice line can also help staff when deciding whether to raise the concern to an external party. Links can be found below.
- 7.2.1 [Further guidance](#) on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure.
- 7.2.2 A free and confidential [advice line](#)

8 Malicious or Vexatious Allegations

- 8.1 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.

- 8.2 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

9 Investigation and Outcome

- 9.1 Once a concern has been raised, The Trust will carry out an initial assessment to determine the scope of any investigation. The Trust will inform the person raising the concern, the outcome of its assessment. They may be required to attend additional meetings in order to provide further information.
- 9.2 In some cases, the Trust may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The Trust may in some circumstances, appoint an external person or body to investigate the concern. The investigator(s) will collate findings on the matter and may make recommendations for change to enable the Trust to minimise the risk of future wrongdoing. This will be sent to a member of the Executive Leadership Team for action if related to activities within an academy or Board of Directors if elsewhere.
- 9.3 The Trust will aim to keep the complainant informed of the progress of the investigation, its likely timescale and outcome. However, sometimes the need for confidentiality may prevent the Trust divulging specific details of the investigation or any disciplinary action taken as a result. The complainant should treat any information about the investigation as confidential.
- 9.4 If it is concluded that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

10 Protection and support for whistleblowers

- 10.1 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.
- 10.2 Staff must not suffer any detrimental treatment as a result of raising a genuine concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If staff believe they have suffered any such treatment, they should inform one of the contact people in paragraph 4.2 immediately. If the matter is not remedied, they should raise it formally using the Trust's Grievance Procedure.
- 10.3 A confidential support and counselling hotline is available to whistle-blowers who raise concerns under this policy. Their contact details are set out at the end of this policy.

11 Review of policy

This policy is reviewed every two years by Trust. The Trust will monitor the application and outcomes of this policy to ensure it is working effectively.

12 Links with Other Policies

This policy links with our policies on:

- Grievance policy
- Child Protection & Safeguarding Policy
- Code of Conduct

13 Appendix 1 - Contacts

CEO	Lois Whitehouse 024 7601 1479 lois.whitehouse@ietrust.org
Deputy CEO	Rob Darling 024 7601 1479 rob.darling@ietrust.org
Chair of Trust Board	Chair of Trust Board Inspire Education Trust c/o Hearsall Academy Kingston Road Coventry CV5 6LR 024 76011479 Mark Gore Mark.gore@ietrust.org
Coventry Diocesan Director of Education	Coventry Diocesan Director of Education The Benn Education Centre Craven Road Rugby CV21 3JZ
Confidential employee assistance programme	Health Assured 0800 028 0199
Protect (Independent whistleblowing charity)	Helpline: (020) 3117 2520 E-mail: whistle@protect-advice.org.uk Website: www.protect-advice.org.uk
The NSPCC whistleblowing helpline	Helpline: 0800 028 0285 E-mail: help@nspcc.org.uk

Reviewed by:

Lois Whitehouse
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Josh Smith

May 2022
October 2023
October 2025

Next Review Date:

October 2027

Approved by Directors:

17 December 2025

Signed:



Lois Whitehouse
CEO



Mark Gore
Chair of Directors