Excelsior Multi Academy Trust

Whistleblowing Policy

This policy was approved by the Trustees on 1st October 2026

Pam Garrington ..... Chair of Trustees

Adopted on 2nd October 2026

This policy will be reviewed on or before 1st October 2027

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1 Introduction

1.1 Excelsior Multi Academy Trust is committed to the highest possible standards of openness, honesty, integrity, probity and accountability. The Board of Trustees expects all employees, workers, volunteers, governors, trustees and others working on behalf of the Trust to uphold these standards in accordance with the Trust's Code of Conduct.

All organisations face the risk of wrongdoing, illegal or unethical conduct, or failures in practice occurring from time to time. A culture of openness and accountability is essential to help prevent such situations and ensure that they are identified and addressed appropriately when they arise.

The Trust therefore encourages anyone who has a genuine concern about suspected wrongdoing or malpractice within the Trust or any of its schools to raise it promptly. Individuals who raise concerns reasonably and in the public interest will be supported and should be able to do so without fear of retaliation, victimisation or other detrimental treatment.

1.2 This policy has been implemented following consultation with the recognised trade unions. It has been formally adopted by the trustees.

1.3 This policy does not form part of any employee's contract of employment or other contract to provide services and we may amend it at any time.

2 Scope and purpose

2.1 The aims of this policy are:

2.1.1 To encourage staff to report suspected wrongdoing or dangers 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 and how the trust will respond.

2.1.3 To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

2.2 This policy applies to all employees of the Trust, governors, consultants, contractors, casual and agency staff and volunteers (collectively referred to as staff in this policy).The Trust will take concerns raised by anyone within the scope of this policy seriously. However, the statutory protections available under whistleblowing law depend on the individual's legal status and whether the disclosure meets the requirements of the Employment Rights Act 1996.

3 What is whistleblowing

3.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. 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:

3.1.1 criminal activity;

3.1.2 miscarriages of justice;

3.1.3 danger to health and safety;

3.1.4 damage to the environment;

3.1.5 failure to comply with any legal or professional obligation or regulatory requirements;

3.1.6 bribery;

3.1.7 financial fraud or mismanagement;

3.1.8 negligence;

3.1.9 breach of our internal policies and procedures including our Code of Conduct;

3.1.10 conduct likely to damage our reputation or financial wellbeing;

3.1.11 unauthorised disclosure of confidential information;

3.1.12 unethical behaviour;

3.1.13 the deliberate concealment of any of the above matters.

3.1.14 Sexual Harassment

3.2 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.

3.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure, preventing sexual harassment at work policy, Anti-harassment and Bullying Policy as appropriate.

3.4 If a complaint relates to your own personal circumstances but you also have wider concerns regarding one of the areas set out at 3.1 above (for example, a breach of our internal policies), you should discuss with a member of the School's leadership team which route is the most appropriate.

3.5 If you are uncertain whether something is within the scope of this policy you should seek advice from a member of the Trust's leadership team.

3.6 If your concern is in relation to safeguarding and the welfare of pupils or students at the school, you should consider whether the matter is better raised under the Trust's child protection policy and in accordance with the arrangements for reporting such concerns, for example via the designated safeguarding lead, although the principles set out in this policy may still apply.

4 Raising a whistleblowing concern

4.1 We hope that you will be able to raise any concerns with your 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.

4.2 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:

4.2.1 The Head Teacher or Head of School

4.2.2 The Trust Leadership Team (Lisa Davies)

4.2.3 The Chair of Trustees (Jasmine Armstrong)

4.3 Contact details are set out at the end of this policy.

4.4 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

4.5 We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

5 Confidentiality and data protection

5.1 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 will make every effort to protect your identity so far as reasonably practicable and permitted by law. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

5.2 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 paragraph 4.2 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, which offers a confidential helpline. Its contact details are given at the end of this policy.

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

5.3.1 the seriousness of the issue raised;

5.3.2 the credibility of the concern; and

5.3.3 the likelihood of confirming the allegation from other sources.

5.4 The Trust will collect, use, store and share personal data arising under this policy in accordance with the UK General Data Protection Regulation, the Data Protection Act 2018, the Trust's Data Protection Policy and its relevant privacy notices. Information will be shared only with those who need it to assess, investigate or respond to the concern, or where disclosure is required for safeguarding, regulatory or legal reasons. Records will be held securely and retained in accordance with the Trust's records retention arrangements.

6 External disclosures

6.1 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.

6.2 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 advice before reporting a concern to anyone externally. Protect holds a list of prescribed regulators for reporting certain types of concern. Its contact details are at the end of this policy. Alternatively, the list is available from current GOV.UK list of prescribed people and bodies.

6.3 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 paragraph 4.2 for guidance.

7 Investigation and outcome

7.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

7.2 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 an external person or body to investigate the concern. The investigator or investigators will collate findings on the matter and may make recommendations for change to enable us to minimise the risk of future wrongdoing. This will be sent to the Head Teacher or Head of School and/or Trustees for actioning.

7.3 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.

7.4 If, following appropriate consideration, the Trust concludes that an individual has knowingly made a false allegation or acted maliciously, the matter may be addressed under the disciplinary policy. No action will be taken merely because a concern raised in reasonable belief is not substantiated.

8 If you are not satisfied

8.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

8.2 If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in paragraph 4.2. Alternatively, you may contact the Chair of Trustees. Contact details are set out at the end of this policy.

9 Protection and support for whistleblowers

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

9.2 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 you believe that you have suffered any such treatment, you should inform one of the contact people in paragraph 4.2 immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

9.3 Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action. In some cases, the whistleblower could have a right to sue an individual personally for compensation in an employment tribunal.

10 Review of policy

10.1 This policy is reviewed every year by Excelsior Multi Academy Trust. We will monitor the application and outcomes of this policy to ensure it is working effectively.

11 Contacts

Contact	Details
Whistleblowing Officer	Lisa Davies 0121 716 0455 l.davies@excelsiormat.org
Chair of Trustees	Pam Garrington p.garrington@excelsiormat.org
Confidential counselling	Education Support Partnership https://www.educationsupport.org.uk/
Protect	Independent whistleblowing charity Helpline 020 3117 2520 whistle@protect-advice.org.uk https://protect-advice.org.uk/
NSPCC Whistleblowing Advice Line	0800 028 0285

Contact	Details
	help@nspcc.org.uk
Department for Education	0370 000 2288 https://www.gov.uk/government/organisations/department-for-education
Ofqual	0300 303 3344 https://www.gov.uk/government/organisations/ofqual