# Whistleblowing Policy

| | |
|---|---|
| Policy owner: | Chief Operating Officer |
| Approved by: | Audit and Risk Committee |
| Ratified by: | Trust Board |
| Date: | September 2026 |
| Date of next review: | September 2028 |

# CONTENTS


| | | |
|---|---|---|
| 1. | Introduction | 3 |
| 2. | Scope of the policy | 3 |
| 3. | General principles of the policy | 4 |
| 4. | Whistleblowing information | 4 |
| 5. | How to raise a concern | 4 |
| 6. | Procedure for investigating a disclosure | 6 |
| 7. | Complaints and appeals | 7 |
| 8 . | Data protection and record retention | 8 |

# 1. INTRODUCTION

Whistleblowing is the disclosure or communication of information about possible malpractice by individuals or organisations, either internally or externally, to an outside authority. The term 'malpractice' has equal validity in relation to breaches of civil and criminal law. The concept of whistleblowing is also associated with principles of accountability.

Whistleblowing protections are contained within the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998. The legislation is intended to encourage an open, transparent and safe working environment where concerns about past, present or likely future wrongdoing can be identified and addressed. This policy takes account of the statutory framework governing protected disclosures.

Coastal Collaborative Trust (CCT) seeks to run all aspects of Trust's business and activity with full regard for high standards of conduct and integrity and is fully committed to openness and accountability at all times.

CCT recognises that employees are often the first to witness any wrongdoing within an organisation due to their closeness to day-to-day operations. However sometimes, individuals can feel reluctant to share their concerns because they are worried that they are being disloyal, afraid that they may be victimised if they speak up, or worried that no action will be taken to address their concern.

Conversely, it is vital to CCT that any information employees may discover about any past, present or likely future concern is shared at the earliest opportunity to prevent any wrongdoing, which could cause harm to our students, employees, parents/carers, individual Academies or the Trust.

In line with legislation, CCT is committed to creating a climate of trust and openness whereby any person who has a genuine concern or suspicion can raise the matter in full confidence that the matter will be dealt with appropriately and, wherever possible, resolved. Individuals raising a concern can do so without fear of victimisation, subsequent discrimination or disadvantage.

Concerns about wrongdoing within the Trust or any of its Academies, such as fraud, malpractice, mismanagement, breach of health and safety law, or any other illegal or unethical act, should be raised using this procedure.

Though the term 'employees' is used throughout this policy, this should not be seen as incompatible with the term 'workers' under the Public Interest Disclosure Act. The following are described as 'workers': employees, casual workers, employees of subcontractors, agency workers employed by the Trust, trainee teachers and apprentices.

This policy also supports the Trust's safeguarding arrangements and should be read alongside the safeguarding policy.

## 2. SCOPE OF THE POLICY

This policy is applicable to all employees, both paid and voluntary within CCT (including directly employed staff, those employed through an agency or third party, volunteers including governance positions, and those self-employed with a contract for service with CCT). It also covers suppliers and those providing services under a contract with the Trust in their own premises.

## 3. GENERAL PRINCIPLES OF THE POLICY

This policy provides a clear and supportive approach for employees to share any concerns regarding wrongdoing in our Academies and Trust. It also provides a robust procedure which outlines how any concerns will be consistently and fairly investigated by the Trust.

The Trust will protect any employee from suffering any detriment, e.g. victimisation as a result of sharing a genuine concern. CCT is committed to protecting the confidentiality of employees who raise concerns but cannot guarantee absolute confidentiality in every circumstance. An individual's identity may need to be disclosed where this is required by law or is necessary for the proper investigation of the concern, including for safeguarding, regulatory or criminal investigation purposes. Wherever reasonably possible, this will be discussed with the individual beforehand and appropriate support and protective measures will be considered.

## 4. WHISTLEBLOWING INFORMATION

This policy should be used, if, in the course of employment, an employee becomes aware of information which they reasonably believe to indicate one or more of the following:

- that a criminal offence has been committed, is being committed, or is likely to be committed;
- that an individual has failed, is failing, or is likely to fail to comply with any legal duty or obligation to which they are 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;
- that sexual harassment has occurred, is occurring or is likely to occur;
- there is an abuse of position or decision making for personal gain;
- there is behaviour which is in serious breach of the Trust/Academy's procedures and values;
- that information tending to show any of the above, is being, or is likely to be, deliberately concealed.

***The list above is for guidance only and is not intended to be exhaustive.***

Concerns about the immediate safety or welfare of a child must be reported without delay under the Trust's safeguarding procedures.

To be protected by whistleblowing legislation:

- an employee's concern must relate to one of the above listed wrongdoings, whether this is a past, present or likely future wrongdoing;
- an employee must believe that in sharing the concern they are acting in the public interest.

This policy is intended for concerns raised in the public interest. Concerns relating solely to an individual's own employment circumstances should normally be raised under the Trust's Grievance Policy. Complaints from parents, carers or members of the public should normally be addressed through the Complaints Policy.

## 5. HOW TO RAISE A CONCERN

We encourage all our employees to share any concern they may have about any wrongdoing, no matter how minor or major this may seem to be. The earlier they are able to share any concern, the sooner we will be able to take action in response and resolve it.

As a first step, the employee should normally raise concerns with their immediate line manager. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected in the malpractice. If, for any reason, the employee's line manager is not appropriate, the employee should raise their concerns with a member of the senior leadership team (SLT), or any other leader within the Trust, as they feel is appropriate.

An employee may prefer to raise the matter in person, by telephone or in a written form marked private and confidential and addressed to one of the individuals detailed below. Concerns may be raised anonymously. The Trust will consider and, where reasonably practicable, investigate anonymous disclosures. However, anonymity may limit the Trust's ability to investigate the matter fully, seek further information or provide personalised feedback. Individuals are therefore encouraged, but not required, to identify themselves when raising a concern.

In exercising discretion, the factors to be taken into account would include:

- the seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

Employees are encouraged to share as much information as they feel comfortable to do so relating to their concern such as:

- the nature of and reason for their concern;
- any background or history relating to their concern including relevant dates.

Employees should be reassured that whilst helpful at this stage, evidence isn't required in order for their concern to be investigated further; all that is required is a genuine belief or suspicion of wrongdoing.

We recognise that employees may want to have some choice in who they feel comfortable raising any wrongdoing concern with. Therefore, please find a list of all senior leaders to whom they can raise their concern:

- employee's line manager;
- a member of SLT;
- Chair of the Local Governing Board;
- CCT Chief Operating Officer;
- CCT Chief Financial Officer;
- Deputy Trust Leader;
- Trust Leader;
- Chair of CCT Board of Trustees.

We encourage and hope that all our employees are able to share any concerns regarding wrongdoing in the workplace within our Academies or Trust structures through the identified contacts listed above. However, if they feel that it is right to share their concern outside of their Academy or the Trust, then the following are recommended points of contact:

- Ofsted (whistleblowing hotline);
- Director of Children's Services (local authority);
- The Health and Safety Executive (HSE);
- The Financial Conduct Authority (FCA);
- His Majesty's Revenue and Customs (HMRC);
- Police;
- The District Auditor;
- The Ombudsman;
- The Environment Agency;
- Protect (independent whistleblowing charity)
- NSPCC Whistleblowing Advice Line (0800 028 0285) where safeguarding concerns cannot be raised internally or where the individual believes safeguarding concerns are not being appropriately addressed.

Individuals may also report a concern to an appropriate prescribed person or body. The current list of prescribed persons and the matters for which they are responsible is available through the Government's whistleblowing guidance.

It should be noted that if an employee chooses to share their concerns with the media, in most cases they will not be protected by the whistleblowing legislation. It is only in exceptional circumstances where this protection will not be lost when: an individual reasonably believes that the information they disclose is substantially true and that their employer will subject them to detriment or conceal or destroy evidence if they were to share it with them, and when not acting for personal gain.

## 6. PROCEDURE FOR INVESTIGATING A DISCLOSURE

When an employee makes a disclosure, the Trust will acknowledge its receipt in writing **within 5 working days**.

The senior leader (investigating officer) will carry out a preliminary investigation, which may involve an interview with the employee (whistleblower). The employee has the right to be accompanied by a recognised trade union representative or a work colleague. This process will seek to establish the facts of the matter and assess whether the concern has foundation. The initial assessment may

identify the need to involve third parties to provide further information, advice or assistance, for example involvement of other members of Trust staff, legal or HR advisors, external auditors, the Local Authority Designated Safeguarding Officer (LADO), the police and the DfE. The overriding principle which the Trust will have in mind during any whistleblowing investigation is the public interest.

The senior leader will liaise with the employee to:

- indicate how the Trust will propose to deal with the matter;
- estimate of how long it will take to provide a final response;
- advise whether any initial enquiries have been made;
- supply information on employee support mechanisms;
- advise when further investigations will take place and if not, why not.

The amount of contact between the senior leader and the employee will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of information provided. If necessary, the Trust will seek further information from the employee. Every effort will be made to ensure that concerns are investigated as quickly, but as thoroughly as possible and that individuals are kept up to date with the progress of the investigation.

The Trust will take steps to minimise any difficulties which employees may experience as a result of raising a concern. For instance, if they are required to give evidence in criminal or disciplinary proceedings, the Trust will arrange for them to receive advice and support about the procedure. Access to free and confidential counselling services, mediation or dispute resolution services may also be offered.

Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer(s), in conjunction with the Headteacher/Principal will consider what corrective action needs to be taken. This may include some form of disciplinary action or third party referral such as the police.

The employee (whistleblower) will be notified of the outcome of any action taken by the Trust under this policy **within 10 working days wherever possible.** If they are not satisfied that their concern has been appropriately addressed, they can appeal against the outcome by raising the issue with the Trust Leader within **10 working days** of receiving the outcome of any investigation. The Trust Leader will make the final decision on action to be taken and notify the employee of this decision

Where concerns regarding the safety or welfare of a child are identified, safeguarding procedures and any necessary external referrals will take precedence and will not be delayed by the whistleblowing investigation.

The Trust will maintain a confidential record of whistleblowing disclosures, investigations, actions and outcomes in accordance with the Trust's Records Management and Data Protection policies.

*Please note timeframes may be subject to change where a disclosure is raised or the investigation process coincides with the Trust's academic holidays.*

## 7. COMPLAINTS AND APPEALS

If any employee feels that they have been unfairly treated as a result of their whistleblowing actions they must raise this with the senior leader who investigated the concern in the first instance. Alternatively, they may choose to raise a grievance in line with CCT's grievance policy and procedures.

If the employee (whistleblower) is dissatisfied with the conduct of the investigation or resolution of the matter or has genuine concerns that the matter has not been handled appropriately, the concerns should be raised with the Trust Leader or Chair of the Trust Board. Where the original concern relates to the Trust Leader, or it would otherwise be inappropriate for the Trust Leader to consider the appeal, the matter should be raised with the Chair of the Trust Board.

Alternatively, the employee may feel it is appropriate to gain external advice or report the matter to a relevant external body as detailed above. If the employee decides to take the matter outside of the Trust, they should ensure that they do not breach any confidentiality obligations or damage the Trust's reputation in doing so.

Any employee who takes action under the Public Interest Disclosure Act 1998 will be protected from any detriment in relation to any allegations that are made. Employees who make a protected disclosure have the right not to be dismissed, victimised or subjected to any other detriment because they have raised the concern. Whether a disclosure qualifies for statutory protection will depend on the circumstances, including the nature of the concern, the employee's reasonable belief that disclosure is in the public interest and the person or body to whom the disclosure is made.
Individuals considering reporting a matter outside the Trust are encouraged to seek independent advice to ensure that the concern is raised with an appropriate person or body, and that confidential information is handled properly.

## 8. DATA PROTECTION AND RECORD RETENTION

The Trust will maintain appropriate confidential records of disclosures, investigations and outcomes.

Information will be processed in accordance with UK GDPR, the Data Protection Act 2018 and the Trust's Data Protection Policy.

Records will be retained in accordance with the Trust's Records Retention Schedule.

Anonymised information may be reported periodically to the Audit and Risk Committee and Trust Board for governance and assurance purposes.