



TRUE LEARNING PARTNERSHIP

Whistleblowing (Raising Concerns) Policy	
Policy Ref Number: TLP0024	Reviewed by: Director of People & Culture Approved by: People Committee
Policy Date: May 2026	Review Date: May 2029 Unless there are operational or legislative changes that require an earlier review.

1. AIM

This policy aims to:

- Provide for a culture which ensures the highest standards of openness, probity and accountability and which will not tolerate wrongdoing and malpractice
- Encourage individuals affected to feel confident to report suspected wrongdoing as soon as possible and in the right way in the knowledge that their concerns will be taken seriously and investigated, and that their confidentiality will be respected
- Let all employees across the Trust know how to raise concerns about potential wrongdoing in, or by, the Trust ensuring critical information gets to the people who need to know and are able to take action.
- Set clear procedures for how the Trust will respond to such concerns and how it will respond to allegations and how feedback can be obtained on any action.
- Provide safeguards to reassure an individual who raises legitimate concerns in the public interest that they can do so without fear of reprisals or victimisation.
- Ensure that employees know what to do if they are not satisfied with actions taken.

This policy does not form part of any employee's contract of employment and may be amended at any time. The policy applies to employees and to individuals who meet the statutory definition of a 'worker' under the Employment Rights Act 1996 (as amended), including agency workers.

The Trust also permits concerns to be raised under this policy by other individuals providing services (for example, contractors, consultants and volunteers). However, statutory whistleblowing protections apply only where the individual falls within the statutory definition of 'worker'/'employee'.

2. LEGISLATION

The requirement to have clear whistleblowing procedures in place is set out in the [Academy Trust Handbook](#). This policy has been written in line with the above document, as well as [government guidance on whistleblowing](#). We also take into account the [Public Interest Disclosure Act 1998](#).

This policy also reflects legislative changes effective from 6 April 2026, which extend whistleblowing protections to qualifying disclosures relating to sexual harassment.

This policy complies with our funding agreement and articles of association.

3. DEFINITION AND SCOPE OF THIS POLICY

Whistleblowing covers concerns made that report suspected wrongdoing, malpractice, illegality or serious risk in the workplace and the disclosures which are in the public interest. Examples of whistleblowing include (but are not limited to):

- criminal offences, such as fraud or corruption
- pupils' or staff health and safety being put in danger
- failure to comply with a legal obligation or statutory requirement
- breaches of financial management procedures
- a miscarriage of justice
- a risk of or actual damage to the environment
- attempts to cover up the above, or any other wrongdoing in the public interest
- Civil offence e.g. negligence/ breach of contract
- Mistreatment or abuse of a stakeholder or member of the public for whom the Trust has a responsibility

The examples above are illustrative. Whether a disclosure is 'protected' depends on whether the worker reasonably believes the information tends to show one or more of the statutory categories of wrongdoing and that the disclosure is in the public interest, in accordance with the Employment Rights Act 1996 (as amended).

The wrongdoing will typically (although not necessarily) be something witnessed at work, could have happened in the past, present or there is a belief it will happen in the future.

A whistleblower is a person who raises a genuine concern relating to the above.

Not all concerns about the Trust, or individual schools in the Trust, count as whistleblowing, for example, grievances, disputes and private complaints are therefore excluded from this policy. Matters relating to potential child protection or safeguarding matters are handled in accordance with the Trust Child Protection and Safeguarding policies. Matters relating to parental complaints are handled in accordance with the Trust's Complaints policy.

Sexual Harassment

From 6 April 2026, a disclosure relating to sexual harassment may constitute a qualifying disclosure under whistleblowing legislation where it is made in the public interest. Concerns about sexual harassment, bullying or other harassment may also amount to protected disclosures where they reasonably indicate wider risk, repeated behaviour, organisational failure, safeguarding risk, or a culture that could affect others. Where a concern is primarily about an individual's personal employment situation and does not meet the legal test for a protected disclosure, it will normally be considered under the Trust's Dignity at Work or Grievance procedures.

Protect (formerly Public Concern at Work) has [Further guidance](#) on the difference between a whistleblowing concern and a grievance that employees may find useful if unsure.

We recognise that the decision to speak out and report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the suspected malpractice or wrongdoing. As a result, we will not tolerate any detrimental treatment (including informal pressures) and will take appropriate action to protect employees when they raise a concern that they believe to be true.

The Trust recognises that raising concerns about sexual harassment can be particularly sensitive. Any individual making such a disclosure in good faith will be supported and protected in line with this policy and the law.

Should you believe that you have suffered (or may suffer) any detriment as a result of raising a whistleblowing concern, you may report this to your line manager, Head Teacher, the Director of People & Culture, the CEO, or (where appropriate) the Chair of Trustees. The Trust will take prompt steps to assess risk and implement protective measures. You may also raise the matter through the Trust's grievance procedure.

4. TRUST ETHOS

Our Trust is committed to inspiring the best in everyone. Guided by our shared values: we are aspirational in our pursuit of excellence; collaborative in working together and valuing diverse perspectives; compassionate in our care for others; curious in promoting creativity and a love of learning; and inclusive in ensuring everyone feels valued, supported and able to contribute fully.

These values underpin all Trust policies and practices, shaping safe, supportive and innovative environments that empower individuals to achieve their full potential and make a positive difference within their communities and beyond.

5. LINKS TO OTHER POLICIES

This policy links to the following policies:

- Trust Grievance Policy
- Trust Complaints Procedure
- Trust Dignity at Work Policy
- Child Protection and Safeguarding Policies

6. OPEN DISCLOSURES

We want employees to speak up and actively encourage it.

The best culture at True Learning is one where people feel confident in the whistleblowing system and can speak up openly about concerns. This openness makes it easier to investigate the issue and to gather more details to help determine whether concerns are substantiated. It also helps avoid unfair blame and reduces distrust or worry in the workplace. The earlier an employee expresses a concern, the easier it will be to take action. They should raise a concern as soon as they have a reasonable suspicion.

7. CONFIDENTIALITY

The Trust hopes that all employees will feel able to voice whistleblowing concerns openly under this policy. However, you may not feel comfortable reporting concerns openly. In such cases, you may request confidentiality.

We will, as far as possible, keep concerns raised under this policy confidential and only disclose information on a strict 'need to know' basis, subject to legal obligations. This may include sharing information with those responsible for investigating or overseeing the concern, or with external bodies such as the police, local authority or regulatory agencies where required. Where it becomes necessary to disclose your identity, we will, wherever practicable, discuss this with you in advance, explain the reasons, and take reasonable steps to mitigate any risk of detriment.

If an employee is in any doubt, they can also seek advice from Protect (formerly known as Public Concern at Work (PCaW), the independent whistleblowing charity, who offer a free independent and confidential advice including a helpline (please see section 15 for contact details).

8. ANONYMOUS CONCERNS

The Trust encourages employees to put their name to any allegations made as concerns raised anonymously make it more difficult for the matter to be investigated and substantiated and for you to be provided with feedback. However, if you raise a concern and wish to remain anonymous, we'll make every effort to keep your identity confidential and only reveal it where necessary to those involved in investigating the concern and after discussing it with you. Occasionally your identity will become apparent to other parties from the nature of the information provided.

We will investigate all concerns that are raised, even if they are raised anonymously. However, the more information that you can give us, the easier it is for us to progress our investigations. If you raise a concern on an anonymous basis, you should be aware that this may make it impossible for us to fully investigate your concerns.

Click on the link below to submit concerns via an online form. [Confidential Reporting Form/](#). Alternatively, employees can raise concerns through their trade union representative.

Any action taken following investigation into anonymous concerns will be determined proportionately, taking account of the nature and seriousness of the issues raised; the credibility of the concern; the likelihood of confirming the allegations from attributable sources; and the need to protect pupils, staff, the public interest and Trust assets.

9. HOW TO RAISE A CONCERN

As a first step, you should normally raise concerns with your immediate manager as soon as possible. However, depending upon the seriousness and sensitivity of the issues involved and who is suspected of the malpractice or wrongdoing, this may not be appropriate.

Where this is the case, you should report your concern directly to your Head Teacher or to the Chief Executive Officer. Members of the central team should report their concern to the CEO. If the concern is about the CEO, or it is believed they may be involved in the wrongdoing in some way, the central team staff should report the concern to the Chair of Trustees.

In the case of concern relating to the central operations of the Trust which cannot be raised with the appropriate senior manager, the concern should be raised with the Chief Financial Officer (CFO), either directly or via email to info@truelearning.org.uk.

Contractors and consultants should raise concerns with the Head Teacher and for central operations with the appropriate senior manager or Chief Financial Officer via email to info@truelearning.org.uk.

Trustees should raise concerns to the Chair of the Trust Board.

There are two ways to formally make a whistleblowing disclosure. Concerns can be raised verbally or in writing. Where possible, written concerns can help ensure details are recorded accurately, but a concern will not be refused or delayed because it is raised verbally. You are not expected to prove the allegation or provide evidence; you should share the information you have and explain why you are concerned. Reasonable adjustments will be made to support accessibility.

Where concerns are raised in writing, the following information is requested

- Your name and contact details
- Background information and history (giving specific names, dates, places, and supporting documentation or evidence, where possible) including details as to why you are concerned
- Whether the issue has already been reported to management and the outcome of this
- Whether you wish your name to remain confidential
- Whether you want feedback
- The names and jobs of any other employees who may support your concern.

Where reports are made verbally to one of the named officers, the officer will attempt to ascertain the same information in writing. A copy will be sent to the individual making the allegation, or via a representative, to give them an opportunity to agree it is an accurate record of the situation.

The earlier you express the concern, the easier it is to take action. Concerns may be raised by an individual or collectively where more than one person shares the same concern.

10. HOW WE WILL INVESTIGATE THE CONCERNS

Within each school, concerns may be raised with the Head Teacher or a Senior Leader. Where a concern relates to senior leadership, governance, HR/People functions, organisational culture, or where impartiality could reasonably be questioned, the Trust will consider the appointment of an independent Designated Officer and, where appropriate, an external investigator.

In order to protect individuals and those accused of possible malpractice or wrongdoing, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. In determining how to proceed, the Trust will have primary regard to the public interest and the requirements of whistleblowing legislation. Concerns or allegations which are not of a whistleblowing nature, for example, child protection or discrimination issues, will normally be referred for consideration under the relevant procedures.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

As part of the initial investigation, contact will be made with you to clarify your concerns and obtain any further information that you may have. The recipient of your concern will:

- Meet with you within a reasonable time (no later than 10 working days) to discuss your concerns.
- You may be accompanied at any meeting under this policy by a recognised trade union or professional association representative, or a workplace colleague. The companion must respect confidentiality of the disclosure and any subsequent investigation.
- Get as much detail as possible about your concerns at this meeting and record the information. If it becomes apparent the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure
- Reiterate, at this meeting, that you are protected from any unfair treatment or risk of dismissal as a result of raising the concern. However, it is important to note that if the concern is found to be malicious or vexatious, disciplinary action may be taken.
- Establish whether there is sufficient cause for concern to warrant further investigation. In some cases, an internal investigator or team of investigators including staff with relevant experience or specialist knowledge may be appointed. Alternatively, the investigation may be more appropriately handled by an external investigator/agency, such as the Police, Local Authority Designation Officer or external independent enquiry

An initial response will be sent to you within 10 school working days of the concern being raised to indicate:

- how the school or Trust proposes to deal with the matter; and the policy under which it will be dealt with.

- whether the school or Trust's initial view is that it may constitute a protected disclosure (this will be kept under review as information develops).
- contact details for the officer handling the investigation.
- arrangements for confidentiality.
- an estimate of how long it will take to provide a response on the outcome.
- any initial enquiries which may have been made.
- if no action is planned, why not.
- Information on any support to be provided.

The amount of contact between the designated officer and you will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, the designated officer will seek further information from you throughout the investigation.

The Trust will seek to progress investigations without unreasonable delay and, where practicable, will provide an indication of expected timescales. Where timescales change, the individual raising the concern will be kept informed.

We will aim to keep you informed of the progress and outcome of any investigation. However, sometimes the need for confidentiality or legal constraints may prevent the Trust giving you specific details of the investigation or any action taken as a result, for example, any internal disciplinary or external action. Any information shared with you about the investigation must be treated confidentially.

11. COMMUNICATING THE OUTCOME

Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether or not a referral is required to an external organisation, such as the local authority or police.

You will be informed of the outcome of the investigation, though certain details may need to be restricted due to confidentiality. Beyond the immediate actions, the CEO, Trustees and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

If you're not happy with the way your concerns have been addressed, you should escalate your concerns to a more senior manager, who did not deal with your original concern. The senior manager will then determine whether any further investigation is required. This concludes the Trust's internal process under this policy. Nothing in this policy prevents an individual from

making a protected disclosure to a prescribed person in accordance with the law, or from exercising any statutory rights.

12. UNFOUNDED OR MALICIOUS ALLEGATIONS

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.

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.

13. HOW THE MATTER CAN BE TAKEN FURTHER

Whilst the Trust cannot guarantee the outcome that the employee who raises concerns seeks, it will deal with the concern and fairly and in an appropriate way. If you are not happy with the way in which your concern has been handled, you can raise it with one of the Trustees.

The Trust encourages employees to raise their concerns internally, in line with this policy, but recognises that employees may feel the need to report concerns to an external body such as a "regulator". A list of prescribed bodies to whom staff can raise certain "protected disclosure" (qualifying disclosure) with is included [here](#).

It will very rarely be appropriate to alert the media to a concern. Disclosures to the media are protected only in exceptional circumstances set out in whistleblowing legislation and may not be protected if those conditions are not met. The Trust strongly encourages staff to seek independent advice (for example from their trade union or Protect) before considering this step.

The independent whistleblowing charity, Protect, [advice line](#) operates a free confidential independent advice on how best to raise concerns and those which are protected by PIDA.

14. SUPPORT

We understand that raising concerns can be upsetting and stressful.

Where an investigation is necessary, you will be notified of the name of a Support Officer appointed by the Trust. The Support Officer will be independent from the matters raised and not part of the investigation decision-making chain. If you raise reasonable concerns about the Support Officer's independence, the Trust will consider these and determine whether an alternative appointment is appropriate.

The Support Officer will make contact with you and explain their role: dealing with all confidentiality issues; agreeing frequency of contact and keeping you informed about the progress of the investigation. They will also inform the person investigating the concern of any

further issues you think may be necessary and relevant. Where you are employed by an agency or third party, the support worker is likely to be sourced from the agency/employer.

You should raise with the Support Officer any concerns about the conduct of the whistleblowing process who will then take the appropriate steps to support you, both in the workplace and at any criminal or disciplinary proceedings which may eventually result and at which you may be asked to give evidence.

Where appropriate, the Trust will consider interim measures during an investigation to reduce any potential risk of detriment to the individual raising the concern. This may include temporary adjustments to reporting lines, duties or working arrangements.

We operate an Employee Assistance Programme. This provides a free, confidential telephone and web-based information support service providing you with access to experienced professionals, consultants and counsellors. The contact number is 03303 800658, and they can offer you emotional support 24 hours a day, seven days a week.

We also have trained mental health first aiders who work across all sites within the Trust. If you feel you need to talk to someone, please contact a mental health first aider directly or alternatively contact the People and Culture Team who will be able to put you in contact with one of our trained mental health first aiders.

You can also seek support from Protect. Protect is an independent whistleblowing charity and they operate a confidential helpline.

Their details are:

Advice Line: 020 3117 2520

Website: <https://protect-advice.org.uk>

Email: whistle@protect-advice.org.uk

15. EQUALITY, CONSISTENCY OF TREATMENT AND FAIRNESS

The Trust is committed to ensuring that the whistleblowing process is accessible and fair. Reasonable adjustments will be considered and, where appropriate, made throughout the process, including in relation to meetings, communication methods and the format of information.

The procedures should be applied irrespective of the age, marital status (including civil partnership), sex, race, disability, religion or belief, sexual orientation, gender reassignment, pregnancy or maternity, socio economic status or caring responsibility of the person concerned. This means that the policy may need to be adjusted to cater for the specific needs of an individual including the provision of information in alternative formats where necessary.

16. RECORD KEEPING AND LEARNING

The Trust will keep an appropriate record of concerns raised under this policy, including the number and general nature of concerns, themes identified and any learning actions taken. Information will be recorded and reported in an anonymised way and shared periodically with the Trust Board and/or People Committee to support oversight and continuous improvement.

17. MONITORING AND REVIEW

Any changes made to this policy will be communicated to all employees and relevant stakeholders. All employees are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.