

Whistleblowing Policy



Policy Owner:	Lighthouse Multi Academy Trust
Approved/ Ratified:	Pat Hunt
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Document Version Control Log

Version	Modification Date	Synopsis of Changes
1.0	September 2025	
2.0	September 2026	No changes

1. Introduction

'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 worker, is made in the public interest and tends to show serious misconduct.

This malpractice may constitute any behaviour detrimental to the best interests of The Lighthouse Trust, its stakeholders, and its employees. Specific examples of issues covered by the Whistleblowing Policy includes:

- Any unlawful act
- Health and safety issues
- Damage to the environment
- Unauthorised use of public funds
- Fraud, corruption, and wrongdoing of any description
- Inappropriate or improper conduct (including bullying, bribery or harassment)
- Serious failure to comply with appropriate professional standards
- Breach of the Lighthouse Trust Code of Conduct
- Discrimination of any kind
- Negligence
- Any form of unethical conduct
- The deliberate concealment of any of the above matters

The Whistleblowing Policy does not apply to raising grievances about an employee's personal situation. Any such concerns should be raised under the existing provisions for raising grievances.

Provided that you act in good faith and have a reasonable suspicion that the alleged malpractice has occurred, is occurring, or is likely to occur, you can disclose your concerns using this procedure and be protected by law from victimisation or dismissal. To be protected under PIDA, a worker only must have a reasonable belief that the wrongdoing being complained about is being, has been, or is likely to be committed.

Although not strictly required by the Act, the Trust's internal procedures give effect to it. The Trust believes that having internal procedures is in everyone's interest.

2. Aims

This policy aims to:

- Encourage individuals affected to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated, and that their confidentiality will be respected
- Let all staff in the trust know how to raise concerns about potential wrongdoing in or by the trust
- Set clear procedures for how the trust will respond to such concerns
- Let all staff know the protection available to them if they raise a whistle-blowing concern
- Assure staff that they will not be victimised for raising a legitimate concern through the steps set out in the policy, even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue)

This policy does not form part of any employee's contract of employment and may be amended at any time. The policy applies to all employees or other workers who provide services to the trust in any capacity, including self-employed consultants or contractors who provide services on a personal basis and agency workers

3. Legislation

The requirement to have clear whistle-blowing 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 whistle-blowing](#). We also take into account the [Public Interest Disclosure Act 1998](#).

This policy complies with our funding agreement and articles of association

4. Definition of whistle-blowing

Whistle-blowing covers concerns made that report wrongdoing that is “in the public interest”. Examples of whistle-blowing 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
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment

A whistle-blower is a person who raises a genuine concern relating to the above.

Not all concerns about the trust, or individual academies in the trust, count as whistle-blowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistle-blowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance.

When staff have a concern they should consider whether it would be better to follow our staff grievance or complaints procedures.

Protect (formerly Public Concern at Work) has:

- [Further guidance](#) on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure
- A free and confidential [advice line](#)

5. Procedure for staff to raise a whistle-blowing concern

5.1 When to raise a concern Staff should consider the examples in section

when deciding whether their concern is of a whistle-blowing nature. Consider whether the incident(s) was illegal, breached statutory or trust procedures, put people in danger or was an attempt to cover any such activity up.

All staff across the Lighthouse Multi Academy Trust will be made aware of the **NSPCC Whistleblowing Hotline** and will be detailed in the local safeguarding and child protection policy.

All staff can call 0800 028 0285

Monday – Friday 8.00am - 8.00pm

Saturday – Sunday: 9.00am - 6.00pm

Email: help@nspcc.org.uk

Alternatively staff can write to: National Society of Prevention for Cruelty to Children (NSPCC)

Weston House, 42 Curtain Road, London, EC2A 3NH

5.2 Who to report to

Staff should report their concern to their Executive/Head Teacher/Head of School. If the concern is about the Executive Head Teacher/Head of School, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to Paul Drew – Chief Executive Officer or the Chair of the Trustees.

5.3 How to raise the concern

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. Lighthouse Multi Academy Trust procedure for responding to a whistle-blowing concern

6.1 Investigating the concern

When a concern is received by the CEO or Chair of the Trustees– referred to from here as the 'recipient' – they will:

- Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative
- Get as much detail as possible about the concern 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 they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken (see section 6 of this policy)
- Establish whether there is sufficient cause for concern to warrant further investigation. If there is:
 - The recipient should then arrange a further investigation into the matter, involving the [CEO, local governing body and/or chair of trustees – amend to reflect your structure and approach], if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In others, they may need to report the matter to the police
 - The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps

6.2 Outcome of the investigation

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.

They will inform the person who raised the concern 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.

7. Malicious or vexatious 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.

8. Escalating concerns beyond the trust

The trust encourages staff to raise their concerns internally, in line with section 4 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.

The Protect advice line, linked to in section 3 of this policy, can also help staff when deciding whether to raise the concern to an external party.

8. Approval

This policy will be reviewed every 12 months.

These procedures have been agreed by the board of trustees, who will approve them whenever reviewed.

NSPCC

I teach this one quiet kid and I caught him stealing food. Poor thing broke down. I raised it with the head, but months later nothing has changed. Should I take it further?



A chat with your partner over a cup of tea won't change anything. A chat with us can change a child's life.

Call the NSPCC Whistleblowing Advice Line today
0800 028 0285

Free & Anonymous

EVERY CHILDHOOD IS WORTH FIGHTING FOR

www.nspcc.org.uk/whistleblowing

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