



The shared vision for our trust is to “create schools that ‘stand out’ at the heart of their communities.” Our trust has four core beliefs; Family, Integrity, Teamwork and Success that are integral to everything we do. The purpose is to enable everyone to be able to ‘Love Learning, Love Life.’

Our policies are underpinned by our vision, beliefs and purpose

Whistleblowing Policy

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Approval Level	Embark Trust Board

Policy Accountability and Implementation

Policy Title:	Whistleblowing Policy
Policy Author / Reviewers:	Deputy Trust Lead, Safeguarding Lead, People and Culture Lead
Policy Owner:	Embark Safeguarding Lead
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Policy User Group(s)

- All staff

Policy Classification and Publication

Classification

- Statutory

Publication

- Embark Federation website
- Embark Schools website
- Embark central policy portal

Version	Reviewed / Modified by:	Change History	Advisory committee / groups or specialists	Review / Meeting Date/s
3	Embark Safeguarding Lead	Reviewed and no required amendments	Embark Safeguarding Committee Trust Board approval	July 2024
4	Embark Safeguarding Lead	Reviewed and no required amendments	Embark Safeguarding Committee Trust Board approval	July 2025
5.	Embark Safeguarding Lead and People and Culture Lead.	• Updated to reflect current legislation, including the Employment Rights Act 1996 (Protected Disclosures), Public Interest Disclosure Act 1998, Academy Trust Handbook and Keeping Children Safe in Education.	Embark Safeguarding Committee/ People and	Sept 2026

Version	Reviewed / Modified by:	Change History	Advisory committee / groups or specialists	Review / Meeting Date/s
		• Strengthened definitions of whistleblowing and clarified the distinction between whistleblowing, grievances and safeguarding concerns. • Expanded reporting and investigation procedures, including anonymous disclosures, confidentiality, independent investigations and escalation to external agencies. • Enhanced protections for whistleblowers, including protection from detriment, victimisation and dismissal for making protected disclosures. • Added sections on record keeping, data protection, support available to whistleblowers, governance oversight and policy monitoring to reflect current best practice.	Remuneration Trust Board approval	

Whistleblowing Policy

1. Aims

Embark Federation is committed to the highest standards of openness, integrity, accountability and safeguarding. We encourage all workers to raise concerns where they reasonably believe that wrongdoing has occurred, is occurring or is likely to occur.

The Trust recognises that speaking up is an essential part of maintaining a strong safeguarding culture, protecting children, ensuring effective governance and safeguarding public funds.

This policy aims to:

- Encourage individuals to raise concerns as soon as possible where they reasonably believe wrongdoing has occurred or may occur.
- Ensure concerns are taken seriously and investigated appropriately.
- Explain how whistleblowing concerns can be raised.
- Set out how the Trust will respond.
- Explain the legal protections available to individuals who make a protected disclosure.
- Reassure staff that they will not suffer detriment for raising a genuine concern in accordance with this policy.
- Promote a culture of openness, honesty and continuous improvement across the Trust.

This policy does not form part of any employee's contract of employment and may be amended by the Trust at any time.

This policy applies to all workers engaged by the Trust including:

- Employees
- Agency workers
- Supply staff
- Contractors
- Consultants
- Casual workers
- Apprentices
- Volunteers
- Governors and Trustees where appropriate
- Individuals undertaking work experience or placements

2. Legislation

This policy has been developed with reference to:

- Employment Rights Act 1996 (Part IVA – Protected Disclosures)
- Public Interest Disclosure Act 1998
- Academy Trust Handbook (current edition)
- Keeping Children Safe in Education (current edition)
- Department for Business and Trade guidance on whistleblowing

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018

This policy also supports the Trust's responsibilities relating to safeguarding, governance, financial management and regulatory compliance.

3. What is whistleblowing?

Whistleblowing is the disclosure of information where a worker reasonably believes that the information shows, or tends to show, wrongdoing and that making the disclosure is in the public interest.

Examples include, but are not limited to:

- Criminal offences, including fraud, theft or corruption
- Safeguarding failures or practices that place children at risk
- Risks to the health or safety of pupils, staff or others
- Breaches of legislation or statutory duties
- Serious breaches of Trust policies or procedures
- Financial malpractice or misuse of public funds
- Deliberate concealment of wrongdoing
- Environmental damage
- Abuse of authority or serious misconduct
- Miscarriages of justice

A whistleblower is someone who raises such concerns under this policy.

Matters not normally covered

Whistleblowing is different from a personal employment concern.

Issues relating solely to an individual's employment, for example:

- Pay
- Terms and conditions
- Bullying
- Harassment
- Relationships at work
- Working practices affecting only the individual

should normally be raised through the Trust's Grievance Policy or other relevant employment procedures.

Where there is uncertainty about the correct procedure, advice can be sought from Protect (formerly Public Concern at Work).

Safeguarding concerns

Nothing within this policy replaces the Trust's safeguarding procedures.

Concerns regarding the safety or welfare of children must always be reported immediately in accordance with the Child Protection and Safeguarding Policy.

Where safeguarding concerns involve systemic failures, leadership failures, governance concerns or failures to act appropriately, they may also constitute whistleblowing concerns.

4. Raising a whistleblowing concern

4.1 When should concerns be raised?

Concerns should be raised as soon as reasonably possible.

Workers do not need proof of wrongdoing before raising a concern. They should have a reasonable belief that the information they are disclosing indicates wrongdoing and that disclosure is in the public interest.

4.2 Who should concerns be reported to?

School-based staff should normally report concerns to the Headteacher.

If the concern relates to the Headteacher, or the individual believes the Headteacher may be involved, concerns should be reported to the Trust Leader or Chair of Trustees.

Central Team staff should normally report concerns to the Trust Leader.

If concerns relate to the Trust Leader, or they are believed to be involved, concerns should be reported directly to the Chair of Trustees.

Where concerns relate to the Chair of Trustees, they should be reported to the Vice Chair of Trustees or another appropriate trustee.

4.3 How should concerns be raised?

Concerns should normally be made in writing wherever possible.

The disclosure should include, where known:

- what happened;
- who was involved;
- dates, times and locations;
- any supporting evidence;
- names of any witnesses;
- why the individual believes the matter is in the public interest.

A concern may also be raised verbally where appropriate. The recipient will make a written record of the discussion.

4.4 Anonymous disclosures

Anonymous disclosures will be considered.

However, the Trust's ability to investigate or provide feedback may be limited where insufficient information is available or where the individual cannot be contacted for clarification.

4.5 Confidentiality

The Trust will make every reasonable effort to protect the identity of a whistleblower.

However, there may be circumstances where disclosure of an individual's identity is required by law or is necessary to enable a fair investigation, safeguarding processes or legal proceedings.

Where this becomes necessary, the Trust will discuss this with the individual wherever reasonably practicable.

5. How the Trust will respond

5.1 Initial response

Upon receiving a concern, the recipient will normally:

- acknowledge receipt within five working days;
- arrange to meet the individual as soon as reasonably practicable;
- allow the individual to be accompanied by a trade union representative or workplace colleague if requested;
- obtain sufficient information to understand the concern;
- determine whether the matter falls under this policy or another Trust procedure;
- assess whether immediate action is required to protect children, staff, finances or evidence.

Where urgent safeguarding concerns arise, appropriate safeguarding procedures will take precedence.

5.2 Investigation

Where further investigation is required, the Trust will appoint an investigator who is independent of the matters under investigation wherever reasonably practicable.

Depending upon the circumstances, investigations may involve:

- senior Trust leaders;
- Trustees;
- external investigators;
- HR advisers;
- safeguarding professionals;
- financial auditors;
- legal advisers.

Where appropriate, concerns may be referred immediately to external agencies including:

- Police;
- Local Authority;
- Local Authority Designated Officer (LADO);
- Education and Skills Funding Agency;
- Charity Commission;
- Health and Safety Executive;

- Information Commissioner's Office;
- other regulatory bodies.

The Trust will seek to investigate concerns promptly, proportionately and fairly.

The individual raising the concern will normally receive updates regarding progress where appropriate, although information may be restricted due to confidentiality or legal requirements.

5.3 Investigation outcome

Following the investigation, a written record of the findings will be prepared.

The investigation may conclude that:

- the concern is upheld;
- the concern is partially upheld;
- insufficient evidence exists to reach a conclusion;
- the concern is not upheld.

Recommendations may include:

- disciplinary action;
- safeguarding action;
- policy changes;
- training;
- governance improvements;
- referral to external agencies;
- criminal investigation where appropriate.

The individual raising the concern will normally be informed that the investigation has concluded and whether appropriate action has been taken, although specific employment or disciplinary information relating to others will remain confidential.

The Trust cannot guarantee that the outcome sought by the whistleblower will be achieved but will ensure concerns are considered fairly and objectively.

6. Protection for whistleblowers

No worker who raises a protected disclosure in accordance with this policy will suffer dismissal, disciplinary action, victimisation, harassment or any other detriment because they have raised a concern.

Any member of staff who subjects another person to detriment because they have made a protected disclosure may themselves be subject to disciplinary action.

Where an individual believes they have suffered detriment after making a disclosure, they should report this immediately to the Trust Leader or Chair of Trustees.

7. Malicious or knowingly false allegations

The Trust encourages staff to raise concerns whenever they reasonably believe wrongdoing may have occurred.

No action will be taken against an individual who raises a concern honestly and in the reasonable belief that it is true, even if the concern is not subsequently upheld.

However, where it is established that an allegation has been knowingly made falsely, maliciously or for personal gain, disciplinary action may be considered.

8. Record keeping

The Trust will maintain confidential records of whistleblowing concerns, investigations and outcomes.

Records will be retained securely in accordance with the Trust's Data Protection Policy, Records Retention Schedule, UK GDPR and the Data Protection Act 2018.

Access to records will be restricted to those who have a legitimate need to know.

9. Raising concerns externally

The Trust encourages concerns to be raised internally wherever possible.

However, workers have the right to make protected disclosures to prescribed persons or bodies where permitted by law.

Examples include:

- Education and Skills Funding Agency
- Department for Education
- Charity Commission
- Health and Safety Executive
- Information Commissioner's Office
- HM Revenue & Customs
- Police

Independent advice is available from Protect, which provides free and confidential whistleblowing advice.

10. Support available

Individuals raising concerns may seek advice and support from:

- their trade union;
- professional association;
- Protect;
- the Trust's Employee Assistance Programme

11. Monitoring and review

The Trust Board has overall responsibility for this policy.

The Safeguarding Committee will monitor its implementation and receive assurance that whistleblowing arrangements remain effective.

This policy will be reviewed annually, or sooner where there are changes in legislation, statutory guidance or operational requirements.

12. Links with other policies

This policy should be read alongside:

- Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Grievance Policy
- Complaints Procedure
- Disciplinary Policy
- Managing Allegations Against Staff Policy
- Anti-Fraud and Corruption Policy
- Data Protection Policy
- Records Management and Retention Policy

This version brings the policy into line with current legislation and guidance, including the **Employment Rights Act 1996 (protected disclosures), Public Interest Disclosure Act 1998, Academy Trust Handbook and KCSIE 2026**. It also strengthens the policy around safeguarding culture, confidentiality, anonymous disclosures, protection from detriment, independent investigations, record keeping and governance while remaining proportionate and suitable for an academy trust.