



The LETTA Trust

Whistleblowing Policy

Approved & adopted on:	Autumn 2026	To be reviewed:	Autumn 2027
Reviewed by:	Trust Board	Signed:	



Contents

1. Introduction	3
2. What is whistleblowing?	4
3. Protecting the whistleblower	5
4. When should whistleblowing procedures be used?	5
5. Who to report to	6
6. The procedure	7
8. Malicious accusations	9
9. Informing external agencies	9
9. Confidential worker enquiries	10
10. Monitoring, evaluation and review	10
11. Links with other policies	11



1. Introduction

The Whistleblowing Policy is there for everyone who works for the Trust or who provides services to it, whatever those services might be. This includes employees, former employees, agency and supply staff, casual and temporary staff, trainee teachers, people on work experience, and the staff of contractors and suppliers working on our premises. Throughout this policy, these individuals are referred to as workers. The term is used in the broad sense given to it by the [Employment Rights Act 1996](#) for whistleblowing purposes, and is not confined to those holding a contract of employment.

The Trust also extends this procedure to volunteers including governors and trustees, who may raise concerns in the same way and who will be treated in the same way. The statutory protections described in section 3, however, apply only to workers.

The Policy encourages and enables all workers to raise concerns within the Trust rather than overlooking a problem or “blowing the whistle” outside. It is not part of any employment contract and may be amended at any time.

The LETTA Trust is committed to the highest possible standards of openness, professionalism and accountability. We encourage workers who have concerns about any aspect of the Trust's activities to come forward and voice those concerns. Anyone who raises a concern is protected by the [Public Interest Disclosure Act 1998](#).

The LETTA Trust is committed to the highest possible standards of openness, professionalism and accountability. We encourage workers who have concerns about any aspect of the Trust's activities to come forward and voice those concerns. Anyone who raises a concern is protected by the [Public Interest Disclosure Act 1998](#).

Workers are often the first to realise that there may be something seriously wrong within a School or the Trust. Normally, workers would be expected to raise any concerns initially with their line manager or the Headteacher. Sometimes, however, don't wish to express concerns because they feel that speaking up would be disloyal or they may fear harassment or victimisation as a result of speaking up. In these circumstances, it could be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

A worker who raises a concern in the reasonable belief that it is in the public interest, and who does so through one of the routes set out in this policy, is making a protected disclosure and is protected from dismissal and from detriment under the [Public Interest Disclosure Act 1998](#) and the [Employment Rights Act 1996](#).

1.1 The aim of the policy is to:

Allow staff to raise concerns without fear of victimisation or discrimination



- Provide clear guidance on the process for raising concerns
- Promote internal reporting so that issues can be addressed promptly and effectively

If you would like to speak to someone informally about a concern, prior to raising an issue under the Whistleblowing Policy, you may contact the CEO.

1.2 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 have also taken into account the [Public Interest Disclosure Act 1998](#).

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

2. What is whistleblowing?

Whistleblowing is the term used to describe reporting by a workers or ex-workers of wrongdoing on the part of leaders, those in a governance role or fellow workers. 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
- Sexual harassment

A whistle-blower 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 whistle-blowing.

-
- Whistleblowing is not appropriate for dealing with issues between a worker and the school which relate to the worker's own employment or rights or employment conditions generally. Alternative dispute resolution procedures for that purpose are outlined in the employment terms and conditions.
- Whistleblowing is not appropriate for dealing with pupil complaints, which will be dealt with under separately published procedures.
-



- A concern that a particular child is at risk of harm must be reported immediately to the Designated Safeguarding Lead under the Safeguarding and Child Protection Policy, and not through this procedure. This policy does apply where you have concerns about the way safeguarding is being managed, for example that concerns are not being acted on, that records are not being kept, or that a member of the leadership team is not following safeguarding procedures. If you do not feel able to raise such a concern internally, the NSPCC whistleblowing advice line is available on 0800 028 0285

3. Protecting the whistleblower

Under the Public Interest Disclosure Act 1998, a whistleblower is protected from detriment and unfair dismissal. The Trust will support concerned workers who apply the Whistleblowing Procedure.

Staff are protected by law, and a non-disclosure agreement, confidentiality clause or 'gagging clause' in a settlement agreement or employment contract cannot stop them from making a protected disclosure in the public interest.

Anonymous concerns will be considered and acted on so far as the information allows, though the Trust may be limited in what it can investigate; a confidential record is kept for a stated period; and the responsible committee receives an annual report on the number and type of concerns raised and how they were resolved

4. When should whistleblowing procedures be used?

If a worker has concerns about wrongdoing at a school and feels that those concerns are sufficiently serious to require reporting, this procedure outlines what should be done.

Each individual member of staff should feel able to speak freely on such matters. However, the school and colleagues have the right to protect themselves against unfounded, false or malicious accusations.

Whistleblowing should only be used when the whistleblower has reasonable grounds for believing that a serious offence has been or may be committed. It must never be used without good grounds, falsely or maliciously.



5. Who to report to

Any issue raised will be kept confidential while the procedure is being used.

School staff:

1. In the first instance, raise the concern with your line manager. This may be done orally or in writing
2. If the concern relates to your line manager or a senior leader, raise it with the Headteacher
3. If your concern relates to the Headteacher, raise the matter with the CEO or the Chair of the Local Governing Board
4. Concerns relating to the CEO or those in governance should be referred to the Chair of Trustees
5. A concern about the Chair of Trustees can be taken to the Members group

Central **School Improvement Team** staff:

1. In the first instance, raise the concern with your line manager. This may be done orally or in writing
2. If the concern relates to your line manager or a senior leader, raise it with the Director of School Improvement
3. If your concern relates to the Director of School Improvement, raise the matter with the CEO
4. Concerns relating to the CEO or those in governance roles should be referred to the Chair of Trustees
5. A concern about the Chair of Trustees can be taken to the Members group

Central **Operations Team** staff:

1. In the first instance, raise the concern with your line manager. This may be done orally or in writing
2. If the concern relates to your line manager or a senior leader, raise it with the Chief Finance Officer or Chief Operating Officer
3. If your concern relates to the the Chief Finance Officer or Chief Operating Officer, raise the matter with the CEO
4. Concerns relating to the CEO or those in governance roles should be referred to the Chair of Trustees
5. A concern about the Chair of Trustees can be taken to the Members group

The person with whom the matter is raised is referred to as the "Assessor".



5.1 Roles and names

Chief Executive Officer	Jo Franklin
Chair of Local Governing Board	Please refer to the specific school's website
Chair of Trustees	Peter Sherratt

6. The procedure

The Assessor will:

- Interview the whistle-blower within seven working days, in confidence. An early interview is essential if the concern relates to an immediate danger to loss of life or serious injury, or risk to pupils
- Obtain as much information as possible from the whistle-blower about the grounds for the belief of wrongdoing
- Consult with the whistle-blower about further steps which could be taken
- Advise the whistle-blower of the appropriate route if the matter does not fall under this procedure
- Report all matters raised under this procedure to the Chair of the LGB and the CEO
- At the interview with the Assessor, the whistle-blower may be accompanied by a recognised trade union representative or a work colleague. The Assessor may be accompanied by a member of the school staff to take notes
- The Assessor may at any time disclose the matter to a professionally qualified lawyer for the purpose of taking legal advice. The Assessor may also discuss the issue, in confidence, with other suitable professionals, such as independent HR consultants or school governance providers, in order to assess the nature of the case and to inform the outcome of the investigation

Within ten working days of the interview, the Assessor will recommend one or more of the following:

- The matter be further investigated internally by the school
- The matter be further investigated by external consultants appointed by the school
- The matter be reported to an external agency
- Disciplinary proceedings be implemented against a worker
- The route for the whistle-blower to pursue the matter if it does not fall within this procedure
- That no further action is taken by the school

The grounds on which no further action is taken include:



- The Assessor is satisfied that, on the balance of probabilities, there is no evidence that wrongdoing within the meaning of this procedure has occurred, is occurring or is likely to occur
- The matter is already (or has been) the subject of proceedings under one of the school's other procedures or policies
- The matter concerned is already (or has been) the subject of legal proceedings, or has already been referred to an external agency

The recommendation of the Assessor will be made to the Headteacher. However, should it be alleged that the Headteacher is involved in the alleged wrongdoing, the recommendation will be made to the Chair of the Local Governing Board and the CEO. Similarly, if the CEO is the subject of the allegation, the recommendation will be made to the Chair of Trustees.

The Headteacher or CEO, as appropriate, will ensure that the recommendation is implemented unless there is a good reason for not doing so in whole or in part. Such a reason will be reported to the next meeting of the Local Governing Board.

The whistle-blower's identity will be kept confidential unless the whistle-blower otherwise consents or unless there are grounds to believe that the whistle-blower has acted maliciously. In the absence of such consent or grounds, the Assessor will not reveal the identity of the whistle-blower except:

- Where the Assessor is under a legal obligation to do so
- Where the information is already in the public domain
- On a legally privileged basis to a professionally qualified lawyer for the purpose of obtaining legal advice

The conclusion of any agreed investigation will be reported by the Assessor to the whistle-blower promptly within 28 working days of the initial interview. All responses to the whistle-blower will be made in writing and sent to the whistle-blower's home address.

If the whistle-blower has not had a response within the above time limit or such reasonable extension as the school requires, the whistle-blower may go to an appropriate external agency, under paragraph 6, but will inform the Assessor before doing so.

The whistle-blower may at any time disclose the matter on a legally privileged basis to a professionally qualified lawyer for the purpose of taking legal advice.

Throughout any investigation, the Trust will provide wellbeing check-ins for both the complainant and the subject(s) of a concern. Where appropriate, support and signposting



to manage expectations, protect emotional wellbeing and maintain professional confidence will be offered.

7. Malicious accusations

If a concern is raised in good faith which is not confirmed by investigation, no action will be taken against the reporter; however, a deliberately false or malicious accusation made by a whistle-blower will be treated as potential gross misconduct and will be dealt with under the school's disciplinary procedure, as well as potentially exposing the whistle-blower to legal liability.

8. Informing external agencies

Within the Trust, all staff have a duty of confidentiality. The duty of confidentiality is implied by the law in every contract of employment and prohibits workers from publicly disclosing employers' confidential information, unless it is in the public interest that the information is disclosed or unless the school fails to follow required procedures. Other legal restrictions on the disclosure of information, for example under data protection legislation, may also apply.

The Trust would prefer that concerns are raised internally in the first instance, so that they can be addressed quickly. However, nothing in this policy prevents you from making a disclosure directly to the organisations listed below. A disclosure to these organisations is protected by law, and you will not be subject to any disciplinary action or detriment for making one:

- Department for Education (DfE). In these circumstances, the DfE will assess whether all school processes have been applied and that the Assessor has done everything possible to resolve the issue. If this is not the case, the DfE will refer the matter back to the Assessor
- Ofsted
- NSPCC
- ICO
- Charity Commission
- Member of Parliament
- National Audit Office
- Health and Safety Executive
- Police
- 'Protect' (formerly Public Concern at Work) has a free and confidential advice line and further guidance on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure



Disclosure to the media should be a last resort. In almost all cases the routes set out in this policy, including disclosure to the organisations above, will be the appropriate course and will carry legal protection. Staff considering approaching the media are strongly encouraged to take advice first from their trade union or from Protect, as the legal protection available for such disclosures is narrower and depends on the circumstances.

9. Confidential worker enquiries

Workers may, on a confidential basis, seek prior guidance from the Headteacher if they wish to establish whether any course of conduct on their part or on the part of another worker may amount to wrongdoing under these procedures. Such enquiry shall be kept confidential.

The Headteacher will provide guidance on the basis of the information provided, but such guidance will not prejudice the rights of the school or any person under these procedures.

10. Monitoring, evaluation and review

The Trust Board Resources Committee will assess the implementation and effectiveness of this policy. The policy will be promoted and implemented throughout the schools in the Trust.

The Whistleblowing Policy will be reviewed by the Trust Board annually and signed by the Chair of the Trust Board.

11. Links with other policies

- Staff Grievance Policy
- Complaints Procedure
- Child Protection and Safeguarding Policy
- Disciplinary Policy
- Staff Code of Conduct