
Confidential Reporting/Whistleblowing Policy

Review: Sept 2029



This policy has been **shared** with the following professional associations and Trade Unions representing Teachers, Headteachers and Support Staff:

- National Education Union
- National Association of Schoolmasters Union of Women Teachers
- National Association of Headteachers
- Unison
- GMB
- Association of School and College Leaders
- Unite

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1.0 Background

- 1.1 The Public Interest Disclosure Act 1998 <http://www.hmso.gov.uk/acts.htm> provides protection for staff who raise concerns about wrongdoing (e.g.: frauds, dangers at work, etc.) within their organisation. Following the legislation, subsequent Employment Tribunal cases have clearly indicated to employers that they should have an effective Whistleblowing Policy in place.

2.0 Introduction

- 2.1 The Diocese of Hereford Multi Academy Trust (Trust) recognises that a member of staff may be the first to realise if something is wrong within their school or the Trust. The Trust's Central team, working alongside Headteachers and LGB members, is committed to ensuring all concerns are handled professionally and consistently across all our schools. .
- 2.2 It is important for staff to know that the academies in the Trust are committed to the highest possible standards of openness, probity and accountability. Part of meeting this commitment is to encourage employees and others with concerns about any aspect of their schoolwork to feel able to come forward and voice those concerns. The Trust recognises the need for confidentiality and the fact that the majority of cases will have to proceed on a confidential basis.
- 2.3 This policy has been updated to reflect the Employment Rights Act 2025, which strengthened protection for workers who raise concerns in the public interest. The Act recognises sexual harassment as a protected whistleblowing disclosure, reinforcing our commitment to providing a safe, respectful and inclusive working environment where all concerns can be raised without fear of detriment. The Trust takes its duty to prevent sexual harassment seriously and is committed to taking all reasonable steps to ensure that harassment does not occur in our workplaces.

3.0 Aims of the Policy

- 3.1 The policy is designed to ensure that staff can raise their concerns about wrongdoing or malpractice within the school without fear of victimisation, subsequent discrimination or disadvantage. It is also intended to encourage and enable them to raise serious concerns within the Trust and its schools rather than ignoring a problem or 'blowing the whistle' outside.

This policy aims to:

- 3.2 encourage staff to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice;
- 3.3 provide avenues for them to raise concerns, in confidence if requested, and receive feedback on any action taken;
- 3.4 ensure that they receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied;
- 3.5 reassure them that they will be protected from possible reprisals or victimisation if they have made any disclosure in the public interest.
- 3.6 demonstrate the Trust's commitment to preventing sexual harassment and other forms of misconduct by creating clear routes for concerns to be raised and addressed.

4.0 Range of the Policy

- 4.1 The policy is intended to enable those who have concerns regarding wrongdoing or malpractice to report those concerns at the earliest possible opportunity so that they can be properly investigated. The policy is not, however intended to replace existing procedures, for example:
 - 4.1.1 If the concern relates to someone's own treatment as a member of staff or breaches of their own employment contract, they should raise this under the existing grievance procedure, as appropriate.
 - 4.1.2 If a parent or other user of the school has a concern about services provided, they should raise this as a complaint to the Trust and/or school.
 - 4.1.3 Some areas have their own specific procedures which need to be carefully followed, this is particularly important for Child Protection issues.
- 4.2 Where concerns are raised, the subsequent investigation may take the form of any appropriate procedure, either internal or external, e.g. an internal audit enquiry or a Police investigation.
- 4.3 The person who raised the concerns will ordinarily be kept informed of progress and of the outcome of any investigation.

5.0 Who can raise a concern under this Policy?

- 5.1 The provisions of the policy apply to all:
 - Employees at the school

- Local Governing Board (LGB) members of the school
- Employees of contractors working for the school, e.g. agency staff
- Employees of suppliers
- Voluntary workers within the school

6.0 What should be reported?

- 6.1 A qualifying disclosure means any disclosure of information that in the reasonable belief of the employee is made in public interest. Staff should report any concerns that they have about service provision or about the conduct of employees or LGB members of the school or others acting on behalf of the school and/or Trust that:
- 6.1.1 make them feel uncomfortable in terms of known standards, or
 - 6.1.2 are not in keeping with the school's and/or Trust's regulations and policies, or
 - 6.1.3 fall below established standards of practice, or improper behaviour.
- 6.2 These concerns might relate to:
- 6.2.1 Conduct which is unlawful.
 - 6.2.2 Miscarriages of justice.
 - 6.2.3 Discrimination, harassment, bullying or victimisation contrary to the Equality Act 2010, including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
 - 6.2.4 Sexual harassment, sexual misconduct, unwanted conduct of a sexual nature, abuse of power for a sexual purpose, inappropriate sexualised behaviour, conduct creating an intimidating, hostile, degrading, humiliating or offensive working environment, or concerns that reports of such behaviour have not been appropriately addressed.
 - 6.2.5 Health and safety risks affecting employees, pupils, visitors or members of the public.
 - 6.2.6 Failure to comply with safeguarding requirements, including inappropriate conduct towards pupils, staff, volunteers or visitors.
 - 6.2.7 Damage to the environment.
 - 6.2.8 Unauthorised use of public or Trust funds.
 - 6.2.9 Possible fraud, corruption or financial irregularity.
 - 6.2.10 Neglect or abuse of service users.
 - 6.2.11 Deliberate concealment of information relating to any of the above matters.
 - 6.2.12 Other unethical conduct.

6.3 Prevention of Sexual Harassment

The Trust is committed to providing a safe, respectful and inclusive working environment in which all employees, workers, volunteers, governors, directors, contractors and visitors are treated with dignity and respect.

6.3.1 The Trust will take reasonable steps to prevent sexual harassment and will not tolerate behaviour that creates an intimidating, hostile, degrading, humiliating or offensive environment.

6.3.2 Sexual harassment may include, but is not limited to:

- unwelcome sexual comments, jokes or remarks;
- unwanted physical contact;
- sexual advances or requests for sexual favours;
- displaying, sharing or circulating offensive material;
- inappropriate communications, including electronic communications and social media messages;
- conduct that causes an individual to feel intimidated, offended, humiliated or unsafe.

6.3.3 Any individual who experiences, witnesses or becomes aware of sexual harassment or sexual misconduct is encouraged to raise concerns using the appropriate Trust procedure. Where concerns indicate wider organisational failings, abuse of position, safeguarding concerns, or systemic misconduct, they may be reported under this Whistleblowing Policy.

7.0 The Legal Framework

This policy operates in accordance with:

- Public Interest Disclosure Act 1998
- Employment Rights Act 1996
- Employment Rights Act 2025
- Equality Act 2010
- Worker Protection (Amendment of Equality Act 2010) Act 2023
- Keeping Children Safe in Education (current edition)
- Trust's Code of Conduct
- Grievance Policy
- Safeguarding and Child Protection Policies

8.0 Harassment or Victimisation

8.1 The Trust is committed to good practice and high standards and to being supportive of its staff.

8.2 The Trust recognises that the decision to report a concern can be a difficult one to make. If a member of staff honestly and reasonably believes what they are saying is true, they should have nothing to fear because they will be doing their duty to the school, their colleagues and those for whom they are providing a service.

The Trust will not tolerate harassment, victimisation, retaliation or any other detrimental treatment (including informal pressure) towards any individual who raises a concern in good faith under this policy.

No employee, worker, volunteer, governor, trustee or contractor will suffer disadvantage, discrimination, bullying or unfavourable treatment because they have raised a concern, provided information, acted as a witness or participated in an investigation regarding suspected wrongdoing.

Any act of retaliation, victimisation or attempted deterrence against a person who has raised a concern under this policy may result in disciplinary action and could constitute gross misconduct.

9.0 Support for the Person Raising Concerns

Throughout the process the member of staff:

9.1 will be protected from suffering detriment, bullying or harassment from another employee

9.2 will be given full support from the management and LGB members of the Trust

9.3 their concerns will be taken seriously

9.4 The Trust will do all it can to help them throughout the investigation

9.5 If following discussions with the member of staff, the Trust's central team considers redeployment on a temporary basis is appropriate, the Trust will seek to arrange for this to take place, consulting with relevant Headteachers and LGB members as necessary and appropriately.

9.6 Where concerns relate to sexual harassment, discrimination, bullying, safeguarding or other sensitive matters, the Trust will consider what additional wellbeing, safeguarding and employee support measures may be appropriate for those involved.

10.0 Confidentiality

- 10.1 All concerns will be treated with confidence and any records relating to the case should be handled in accordance with the Data Protection Act. Every effort will be made not to reveal the identity of the member of staff who raise concerns, should that be their wish.
- 10.2 If the concerns raised are investigated as part of the disciplinary/grievance/harassment procedures, it may be that it is not possible to take the appropriate action on the disclosure without the help of the person raising the concerns. As a result, they may be asked to come forward to act as a witness. If they agree to this, they will be offered the appropriate advice and support.
- 10.3 The Trust recognises the particularly sensitive nature of concerns relating to sexual harassment, discrimination, bullying and safeguarding matters. All reasonable steps will be taken to protect the privacy, dignity and wellbeing of those involved, whilst ensuring that a fair and thorough investigation can be undertaken.

11.0 Anonymous Allegations

- 11.1 This policy encourages staff to put their name to their allegation whenever possible. Concerns expressed anonymously are much less powerful, but they may be considered at the discretion of the school. In exercising this discretion, the factors to be taken into account would include:
- 11.1.1 the seriousness of the issue raised
 - 11.1.2 the credibility of the concern; and
 - 11.1.3 the likelihood of confirming the allegation from other sources.

12.0 Untrue Allegations

- 12.1 Some concerns raised may, when investigated, prove to be groundless. If a concern is raised or an allegation made in public interest by someone reasonably believing it to be true and their concerns are not confirmed by investigation, they should have nothing to fear as the school will recognise their genuine motives. However, it needs to be stated, should someone make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against them.

13.0 Who should a concern be raised with?

- 13.1 The Trust operates a centralised approach to managing whistleblowing concerns to ensure consistency, expertise and appropriate independence in handling such matters.
- 13.2 As a first step, staff may raise concerns with their line manager or Headteacher if they feel comfortable doing so. However, **all whistleblowing concerns must be reported to the Trust's Central Team to ensure proper oversight and investigation.**
- 13.3 Staff can raise concerns directly with:
- HR & Operations Manager – hr@dhmat.org.uk
 - CEO – complaints@dhmat.org.uk
 - Chair of the Local Governing Body
- 13.4 Concerns involving a Headteacher should be reported directly to the CEO
- 13.5 Concerns involving the CEO, Director or a senior Trust leader should be reported to:
- Chair of the Trust Board governance@dhmat.org.uk
 - In the event of concern with reporting to the Chair of the Trust Board, contact hr@dhmat.org.uk
- 13.6 The Trust's central team will:
- Acknowledge receipt of the concern within 10 academic days
 - Determine the most appropriate person to investigate
 - Provide specialist HR and governance support throughout the process
 - Ensure consistency in approach across all Trust schools and locations
 - Maintain appropriate confidentiality and independence
- 13.7 Employees may also seek independent advice from:
- HR at the Trust's central team
 - Their trade union and/or professional bodies
 - Protect (formerly Public Concern at Work) 0203 117 2520 or visit protect-advice.org.uk

14.0 How the Trust will respond

The Trust will take all concerns seriously and will respond to them, The Trust's central team will coordinate the response, working with the relevant school where appropriate.

- 14.1 In order to be fair to all employees, including those who may have been wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form that investigation should take.
- 14.2 Where concerns or allegations fall within the scope of specific school procedures, then they would normally be referred for consideration under those procedures.
- 14.3 As a result of this, where appropriate, the concerns raised may:
 - 14.3.1 be investigated by management, internal audit or through the discipline/grievance/ harassment process.
 - 14.3.2 be referred to the external auditors.
 - 14.3.3 be referred to and dealt with under the established child protection procedures
 - 14.3.4 form the subject of an independent inquiry.
- 14.4 Within 10 (ten) working days of the concern being raised, the Trust's central team (or the Chair of the Board for concerns involving the CEO or senior Trust leaders) will write to the person raising the concern.
 - 14.4.1 acknowledging that their concern has been received.
 - 14.4.2 indicating how the school proposes to deal with the issue;
 - 14.4.3 telling them whether any further investigations will take place (and if not, explaining why this is the case).
 - 14.4.4 supplying them with information on staff support mechanisms.
- 14.5 The amount of contact between the person raising the concern and those considering the issues will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. It is likely that the person raising the concern will be interviewed to ensure that their disclosure is fully understood.
- 14.6 A meeting can be arranged away from the workplace, if they wish, and a Union or Professional Association Representative or a friend may accompany them in support.

- 14.7 The school will do what it can to minimise any difficulties that staff may experience as a result of raising a concern. For instance, if they are asked to give evidence in criminal or disciplinary proceedings, the Trust will arrange for them to receive appropriate advice and support.
- 14.8 They need to be assured that their disclosure has been properly addressed, unless there are any legal reasons why this cannot be done, they will be kept informed of the progress and outcome of any investigation.

15.0 Record keeping

- 15.1 The Trust has overall responsibility for the maintenance and operation of this policy. The Trust will maintain a record of concerns raised and the outcomes. Records will be kept in such a way so as not to endanger the confidentiality concerning the identity of the person raising concerns.
- 15.2 The Trust will maintain appropriate records of concerns raised, investigations undertaken and outcomes achieved.
- 15.3 The CEO and Board of Trustees will receive anonymised reports, where appropriate, on whistleblowing concerns, themes, lessons learned and actions taken to support organisational improvement and effective governance.

16.0 How the matter can be taken further

- 16.1 The aim of the policy is to provide staff with an appropriate way to raise concerns within the Trust. Hopefully, they will be satisfied with any action taken. However, should this not be the case and they feel it necessary to take the matter outside of the Trust, our prescribed contacts are:
- 16.1.1 Chair of the Board (if not already involved) governance@dhmat.org.uk
- 16.1.2 the external auditor – Bishop Fleming (Worcester) 01905 732100
- 16.1.3 Protect (formerly Public Concern at Work) - 0203 117 2520
- 16.1.4 the Police (for criminal matters)
- 16.2 This does not prevent staff from seeking their own legal advice.
- 16.3 If the member of staff raises their concerns outside the school, they should ensure that it is to one of the above prescribed contacts. A public disclosure to anyone else could take them outside the protection of the Public Interest Disclosure Act and of this policy.
- 16.4 They should not disclose information that is confidential to the school or to anyone

else, such as a client or contractor of the school except to those included in the list of prescribed contacts.

17.0 Review of policy

17.1 Before its publication, the contents of this policy were subject to consultation with the relevant Trade Unions and the Trust will continue to review the policy every 3 years, unless there are legislative changes. As part of this process, views may be sought from employees and relevant Trade Unions, with regard to how effectively the policy has operated and whether any revision is needed.

17.2 In the meantime, should any member of staff wish to suggest any addition/revision to the policy, they should contact the Trust's central team at governance@dhmat.org.uk, who will consider their suggestions and if necessary, put them forward to the Board of Directors.