

# Whistleblowing Policy

**Recommended by:** Senior HR Manager

**Approved by:** Trust Board

**Signed:**



**Position on the Board:** Chair of HR Committee

**Ratification Date** May 2026

**Next Review:** Summer Term 2028

## KEY CHANGES

Section	Change
Section 2	Rephrased to reflect review in accordance with the changes introduced by the Employment Rights Act 2025.
Section 2.2	Rephrased to provide clarity regarding protection from detriment.
Section 3.3 and 3.4	Rephrased to provide clarity regarding victimisation.
Section 3.8	Rephrased to provide clarity regarding relationship with other Trust policies.
Section 4	Rephrased to provide clarity.
Section 5	Rephrased to provide clarity.
Section 5.2	Added to reflect commitment to training managers and leaders.
Section 7	Rephrased to provide access to further advice.

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## 1. INTRODUCTION

- 1.1 Staying true to the principles of our founding organisation, the Royal Society for the encouragement of Arts, Manufactures and Commerce (The RSA), of undertakings for the public good we take a practical view of social justice, moving from powerful thinking into practical action. We consider how Our Distinctive Culture of people, places and processes (see [Central Region Schools Trust - Our Distinctive Culture](#)) can best support our mission of 'supporting social justice through exceptional schools'. This policy is one of our suite of HR policies that drive our people strategy.
- 1.2 This policy applies to anyone working for or on behalf of Central Region Schools Trust including, but not limited to, employees, trustees, governors, casual workers, consultants, contractors, volunteers, supply staff, agency employees and trainee teachers.
- 1.3 People working within organisations are often the first to realise that there may be something wrong in the place in which they work. The Trust is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we encourage employees and others working at or for the Trust who have concerns about any aspect of the Trust's work to come forward and voice those concerns.
- 1.4 The Trust Board and Local Academy Governing Boards are responsible for ensuring the operation of this policy regarding matters relating to the Trust and its individual schools.

## 2. BACKGROUND

- 2.1 The law (Employment Rights Act 1996, as amended by the Employment Rights Act 2025, Public Interest Disclosure Act 1998 and Enterprise and Regulatory Reform Act 2013) provides protection for workers who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in public interest by a worker who has a reasonable belief that there is wrong doing or there are dangers at work. This may include

- a criminal offence;
- a miscarriage of justice;
- danger to health & safety;
- an act causing damage to the environment;
- possible fraud, financial mis-management and/or corruption;
- sexual harassment, as defined under the Equality Act 2010 (occurring, has occurred or likely to occur);
- a breach of any other legal obligation;
- concealment of any of the above; or
- other serious unethical conduct.

The worker has no responsibility for investigating the matter. It is the Trust's or individual school's responsibility to ensure that an investigation takes place.

- 2.2 A worker who makes a protected disclosure has the right not to be dismissed, subjected to any detriment, or victimised because they have made that disclosure. This protection applies from the first day of engagement and extends to employees, agency workers, contractors and other individuals engaged by or on behalf of the Trust.
- 2.3 The Trust encourages workers to raise their concerns under this policy in the first instance. If, having read this policy, you are uncertain about whether it is the appropriate policy or how to proceed, please feel free to seek informal advice at [info@crst.org.uk](mailto:info@crst.org.uk) or 0121 270 3117.

### **3. GUIDING PRINCIPLES**

- 3.1 Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Workers should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- 3.2 The Trust promotes a whole school approach to Safeguarding. In accordance with individual schools' Safeguarding Policies and the latest version of the Keeping Children Safe in Education (KCSIE) statutory guidance, workers are encouraged to raise any concerns they have about inappropriate behaviour towards a child. This includes reporting any low-level concerns in accordance with the Trust Managing Allegations Policy.
- 3.3 No worker will be subjected to any form of detriment as a result of raising a genuine concern under this policy. This includes, but is not limited to, dismissal, disciplinary action, loss of work, change of duties, loss of opportunities, withdrawal of support, isolation, or adverse treatment connected to the disclosure.
- 3.4 Any act of retaliation, victimisation or adverse treatment against an individual for raising a protected disclosure, including disclosures relating to sexual harassment, will be treated as a serious disciplinary matter and may result in disciplinary action up to and including dismissal.
- 3.5 If misconduct is discovered as a result of any investigation under this policy, the Trust's Disciplinary Policy and Procedure may be invoked (in addition to any appropriate external measures).
- 3.6 Malicious/or false allegations will be considered a disciplinary matter. If the individual is a consultant, contractor, supplier or is employed by another organisation, but working on behalf of the Trust, and they make an allegation maliciously or for personal gain, this may result in them being removed from the approved list of contractors or the Trust may discontinue using their services.
- 3.7 An instruction to cover up wrongdoing is in itself a disciplinary matter. If told not to raise or pursue any concern, even by a person in authority, you should not agree to remain silent. You should report the matter in accordance with section 4 of this policy.
- 3.8 This policy operates alongside, and does not replace, the Trust's other policies, including the Disciplinary Policy and Procedure, Grievance Policy and Procedure, Preventing Sexual Harassment Policy and Managing Allegations Policy.
- 3.9 This policy is for disclosures about matters other than a breach of an employee's own contract of employment. If you are concerned that your own contract has been, or is likely to be, breached, you should use the Trust's Grievance Policy.

### **4. HOW TO RAISE A CONCERN**

#### **STEP 1**

- 4.1 If you have a concern as referenced in section 2.1, the Trust Board encourages you to raise the matter at the earliest opportunity. Concerns may be raised with the relevant Principal, Central Team Leader or Executive Leader or, where appropriate, through alternative reporting routes set out in this policy. Concerns relating to sexual harassment may be raised under this Whistleblowing Policy or the Preventing Sexual Harassment Policy and we will seek to agree with you which policy the matter being reported will be dealt with under. If your concern is related to a child protection issue, you must follow the relevant Child Protection and Safeguarding Policy.
- 4.2 Concerns may be raised verbally and/or in writing. If you wish to make a written report you are advised to include in your letter the background and history (giving relevant dates) and give the reason why you are particularly concerned about the matter. You may also wish to seek advice from your trade union representative (if applicable) at this stage.
- 4.3 If you are personally involved in the matter you raise, you must state this from the outset. You may invite your

trade union, or a work colleague to be present during any meetings or interviews (which may be arranged away from your normal workplace if you wish) in connection with the concerns you have raised.

- 4.4 However, if you feel unable to raise the matter with your Principal/line manager due to the seriousness and sensitivity of the issues involved, or if you believe that they may be involved, you should speak to the appropriate manager in accordance with the Trust Scheme of Delegation.
- 4.5 If the concern is related to child protection, you may wish to raise it with the appropriate Local Authority Designated Officer (LADO):
- Birmingham LADO: 0121 675 1669 or [ladoteam@birminghamchildrenstrust.co.uk](mailto:ladoteam@birminghamchildrenstrust.co.uk)
  - Sandwell LADO: 0121 569 4770 or [sandwell\\_lado@sandwellchildrenstrust.org](mailto:sandwell_lado@sandwellchildrenstrust.org)
  - Worcestershire LADO: 01905 846221 or [lado@worcschildrenfirst.org.uk](mailto:lado@worcschildrenfirst.org.uk)
- 4.6 The Trust will respond promptly to concerns raised under this policy. You will be informed who is responsible for handling the matter (the Responsible Officer), how they can be contacted and what support is available. In normal circumstances, written acknowledgement will be provided within 7 working days. The Trust will agree appropriate arrangements to keep you informed, subject to legal and confidentiality constraints.
- 4.7 Some concerns may be resolved by agreed action without the need for an investigation. If urgent action is required, this may be taken before any investigation is conducted.
- 4.8 Thereafter, the Responsible Officer will keep you informed of progress and the outcome of any investigations or decisions on the matter, including the content of any reports written.
- 4.9 The Trust will take steps to minimise any difficulties which you may experience as a result of raising concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, the Trust will arrange for you to receive advice about the policy.

## **STEP 2 - OPTIONAL**

- 4.10 If your concern relates to Health & Safety matters, you may speak to the Trust Head of Operations on 0121 270 3117.
- 4.11 Alternatively, you may wish to contact [info@crst.org.uk](mailto:info@crst.org.uk) or 0121 270 3117, where advice may be sought on the process, or you may be directed towards the appropriate person with specialist knowledge.

## **STEP 3 - RAISING A CONCERN EXTERNALLY**

- 4.12 While the Trust encourages concerns to be raised internally wherever possible, individuals may raise qualifying disclosures with prescribed external bodies in accordance with whistleblowing legislation. A current list of prescribed persons and bodies is available on the GOV.UK website at <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>. Individuals are encouraged to seek advice before making an external disclosure.

## **5. CONFIDENTIALITY**

- 5.1 The Trust is committed to protecting the confidentiality of individuals who raise concerns. Your identity will not be disclosed without your consent unless disclosure is required by law or is necessary to progress an investigation, for example where evidence is required in regulatory, disciplinary or legal proceedings. Where disclosure is necessary, the Trust will discuss this with you in advance wherever possible.
- 5.2 The Trust will ensure that managers and senior leaders receive appropriate training to recognise and respond to whistleblowing concerns, including disclosures relating to sexual harassment, and to ensure individuals raising concerns are treated fairly, lawfully and with appropriate support.

## 6. THE ROLE OF THE TRADE UNIONS

6.1 Trade Unions are committed to the effective use of a Whistleblowing Policy. If you are considering raising concerns using this policy you may wish to seek advice from your trade union representative (if applicable) before doing so, particularly if you believe that the only course of action open to you is to raise your concern with an external body.

## 7. FURTHER ADVICE

The Executive Principal/CEO.	
The relevant Principal, Central Team Leader or Executive Leader.	
Chair of the Local Academy Governing Board	<a href="mailto:governance@crst.org.uk">governance@crst.org.uk</a>
Chair of the Trust Board	<a href="mailto:governance@crst.org.uk">governance@crst.org.uk</a>
Care First (Employee Assistance Programme)	Telephone: 0800 174319 Website: <a href="http://www.carefirst-lifestyle.co.uk">www.carefirst-lifestyle.co.uk</a>
Protect (independent whistleblowing charity)	Helpline: (020) 3117 2520 Website: <a href="http://www.protect-advice.org.uk">www.protect-advice.org.uk</a>
The NSPCC whistleblowing helpline	Helpline: 0800 028 0285 E-mail: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
Department for Education	Telephone: 0370 000 2288 Website: <a href="http://www.gov.uk/government/organisations/department-for-education">www.gov.uk/government/organisations/department-for-education</a>
Ofqual	Telephone: 0300 303 3344 Website: <a href="http://www.gov.uk/government/organisations/ofqual">www.gov.uk/government/organisations/ofqual</a>
Equality & Human Rights Commission (EHRC) / Equality Advisory Support Service (EASS)	Telephone: 0808 800 0082 Website: <a href="http://www.equalityadvisoryservice.com/app/ask">http://www.equalityadvisoryservice.com/app/ask</a> or <a href="http://www.equalityadvisoryservice.com/app/ask">Equality Advisory Support Service (EASS) - GOV.UK</a>