James Cambell Primary School

Whistleblowing Policy

2026-27

Last reviewed on:	November 2026
Next review by:	November 2027 POLICY WILL BE UPDATED IN DECEMBER 2026 BY PARTNERSHIP LEARNING
Staff responsible:	Partnership Learning Trust

James Cambell Primary School

Partnership Learning

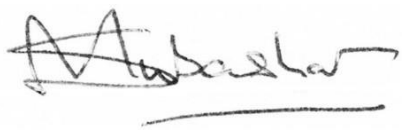
Partnership Learning

Whistleblowing Policy

MONITORING, EVALUATION AND REVIEW

The Board of Trustees and Local Governing Boards will assess the implementation and effectiveness of this policy. The policy will be promoted and implemented throughout the Trust and its schools.

This Policy will be reviewed by the Board of Trustees annually and must be signed by the Chair of the Board of Trustees and Chief Executive.

Policy Adopted/Approved by Board of Trustees:	1st December 2025
Next Review:	Annually
Signature of Chair of the Board of Trustees: 	Signature of Chief Executive: 

WHISTLEBLOWING POLICY

This policy applies to all employees and ex-employees of Partnership Learning ('the Trust') and its schools. Employees may, for this purpose, include, for example, contractors and agency workers.

1 WHAT IS 'WHISTLEBLOWING'?

Whistleblowing inside the work place is the term used to describe reporting by employees or ex-employees, of wrongdoing on the part of management (at school or Trust level), Local Governing Boards, the Board of Trustees or by fellow employees. Wrongdoing may include for example, fraud, corruption, malpractice, breach of health and safety law, or any other illegal or unethical act. Employees may, for this purpose, include, for example, contractors and agency workers.

2 PROTECTING THE WHISTLEBLOWER

Under the Public Interest Disclosure Act 1998 a Whistleblower is protected from detriment and unfair dismissal. The Trust will support and not discriminate against concerned employees who apply the Whistleblowing procedure, provided any claim is made in good faith.

3 WHEN SHOULD WHISTLEBLOWING PROCEDURES BE USED?

3.1 If an employee has concerns about wrongdoing at the Trust or any of its schools and feels that those concerns are sufficiently serious to require reporting, this procedure outlines what should be done.

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

3.3 Whistleblowing should only be used when the party implementing the procedure (Representor) has reasonable grounds for believing that serious wrong-doing has been or may be committed. It must never be used without good grounds, falsely or maliciously.

3.4 Whistleblowing is not appropriate for dealing with issues between an employee and the Trust or one of its schools which relate to the employee's own employment or rights or employment conditions generally. Alternative dispute resolution procedures for that purpose are outlined in the employment terms and conditions.

3.5 Whistleblowing is not appropriate for dealing with pupil complaints, which will be dealt with under separate procedures.

3.6 Whistleblowing is not appropriate to specific cases of child safety or safeguarding which will be dealt with under the procedures specified in that connection. If any staff member has concerns that a pupil is being dealt with unfairly in a school, they should raise their concern, in the first instance with the school's Headteacher or Designated Safeguarding Lead.

4 THE PROCEDURE

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

4.2 The Representor (the person raising the concern) should raise their concern with their line manager. This may be done orally or in writing.

4.3 However, if the concern relates to the Representor's line manager or any person to whom he or she reports, the Representor, if school-based should raise the issue with the Headteacher or if central Trust-based with the Chief Executive.

4.4 If the concern relates to a Headteacher, the Representor should raise the matter with the Chair of the school's Local Governing Board. If the concern relates to the Chief Executive of the Trust, the Representor should raise the matter with the Chair of the Board of Trustees.

4.4.1 If the concern relates to a school's Local Governing Board the Representor should raise the matter with the Trust CEO. If the concern relates to the Board of Trustees, the Representor should raise the matter with the one of the Trust Members.

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

The Assessor will:

4.5.1 Interview the Representor as soon as possible within seven working days, in confidence. Early interview will be essential if the concern relates to an immediate danger to loss of life or serious injury or risk to pupils;

4.5.2 Obtain as much information as possible from the Representor about the grounds for the belief of wrongdoing;

4.5.3 Consult with the Representor about further steps which could be taken;

4.5.4 Advise the Representor of the appropriate route if the matter does not fall under this Procedure;

4.5.5 Other than in the case of paragraph 4.4.1, report all matters raised under this procedure to the Chair of the Local Governing Board* for school-based matters and the Chair of Trustees for central Trust-based matters.

4.5.6 In the case of paragraph 4.4.1, report all matters raised under this procedure to the Board of Trustees if the matter relates to a school's Local Governing Board and to the Trust's Members if the matter relates to the Board of Trustees

4.6 At the interview with the Assessor, the Representor may be accompanied by a recognised trade union representative or a work colleague. The Assessor may be accompanied by a member of school or central Trust 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 services in order to assess the nature of the case and to inform the outcome of the investigation.

4.7 Promptly within ten working days of the interview, the Assessor will recommend one or more of the following:

4.7.1 The matter be further investigated internally by the school or the Trust;

4.7.2 The matter be further investigated by external consultants appointed by the

school or the Trust;

4.7.3 The matter be reported to an external agency;

4.7.4 Disciplinary proceedings be implemented against an employee;

4.7.5 The route for the Representor to pursue the matter if it does not fall within this procedure; or

4.7.6 That no further action is taken by the school or the Trust.

4.8 The grounds on which no further action is taken include:

4.8.1 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;

4.8.2 The Assessor is satisfied that the Representor is not acting in good faith;

4.8.3 The matter is already (or has been) the subject of proceedings under one of the school's or Trust's other procedures or policies;

4.8.4 The matter concerned is already (or has been) the subject of legal proceedings, or has already been referred to an external agency.

4.9 In the case of school-based matters, the recommendation of the Assessor will be made to the school's 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 school's Local Governing Board. Should it be alleged that the Local Governing Board is involved in the alleged wrongdoing, the recommendation will be made to the Chair of the Board of Trustees. The Headteacher or Chair of the Local Governing Board or Chair of the Board of Trustees as appropriate, will ensure that the recommendation is implemented unless there is 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 or Board of Trustees as appropriate.

4.10 In the case of central Trust-based matters, the recommendation of the Assessor will be made to the Chief Executive. However, should it be alleged that the Chief Executive is involved in the alleged wrongdoing; the recommendation will be made to the Chair of the Board of Trustees. Should it be alleged that the Board of Trustees is involved in the alleged wrongdoing; the recommendation will be made to the Members of the Trust. The Chief Executive or Chair of the Board of Trustees or Trust Members as appropriate, will ensure that the recommendation is implemented unless there is good reason for not doing so in whole or in part. Such a reason will be reported to the next meeting of the Board of Trustees or Trust Members as appropriate.

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

4.11.1 Where the Assessor is under a legal obligation to do so;

4.11.2 Where the information is already in the public domain; or

4.11.3 On a legally privileged basis to a professionally qualified lawyer for the purpose of obtaining legal advice.

4.12 The conclusion of any agreed investigation will be reported by the Assessor to the

Representor promptly within twenty eight working days of the initial interview.

4.13 All responses to the Representor will be made in writing and sent to the Representor's home address.

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

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

* *Chairs of Local Governing Boards who have been informed by an Assessor of matters raised under this procedure should report them to the CEO of the Trust, who will inform the Board of Trustees (whilst maintaining confidentiality requirements which protect the identity of the Representor).*

5 MALICIOUS ACCUSATIONS

5.1 A deliberately false or malicious accusation made by a Representor is a disciplinary offence and will be dealt with under the Trust's disciplinary procedures, as well as potentially exposing the Representor to legal liability.

6 INFORMING EXTERNAL AGENCIES

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

6.2 Whistleblowing to an external agency without first going through the internal procedure is a breach of the school or Trust's Code of Conduct. The external agencies which may be used if disclosure is permitted under paragraph 6.1 are:

6.2.1 Department for Education. (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);

6.2.2 Member of Parliament;

6.2.3 National Audit Office;

6.2.4 Health and Safety Executive;

6.2.5 Police.

6.3 Whistleblowing to the media is not appropriate or permitted in any circumstances.

7 CONFIDENTIAL EMPLOYEE ENQUIRIES

7.1 Employees may, on a confidential basis seek prior guidance from their Headteacher (for school-based staff) or the Chief Executive (for central Trust-based staff) if they wish to establish whether any course of conduct on their part or on the part of another employee may amount to wrongdoing under these procedures. Such enquiry shall be kept confidential. The Headteacher/Chief Executive will attempt to provide guidance on the

basis of the information provided, but such guidance shall not prejudice the rights of the school/Trust or any person under these procedures.