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1. INTRODUCTION

In this policy 'Whistleblowing' means the reporting by employees of suspected misconduct, illegal acts, or failure to act within an Academy or across Place Partnership.

Employees are often the first to realise that there may be something seriously wrong within an organisation. 'Whistleblowing' is viewed by Place Partnership as a positive act that can make a valuable contribution to Place Partnership's efficiency and long-term success. It is not disloyal to colleagues or Place Partnership to speak up.

2. ROLES AND RESPONSIBILITIES

BOARD OF TRUSTEES

The Board of Trustees are responsible for approval of all Trust employment policies and will do so following the relevant persons within Place Partnership having consulted where appropriate, with appropriate colleagues and Trade Unions on the content of the policy.

CHIEF EXECUTIVE OFFICER (CEO)

The CEO has overall responsibility to ensure that the expected standards for behaviour and conduct of employees across Place Partnership are clear and that all employees are aware of the Whistleblowing Policy and how employees should feel supported should they need to report a concern.

ACADEMY EDUCATION COMMITTEE (AEC)

Academy Education Committees (AECs) are responsible for supporting senior leaders with any matters brought to the attention of the Academy and/or Trust under this Policy that may require investigation and/or disciplinary action.

EXECUTIVE LEADERS / PRINCIPALS

Executive Leaders and Principals are responsible for ensuring that all employees are aware of the Whistleblowing Policy and have opportunity to read and review it. They are responsible for supporting AECs and the CEO with any matters brought to the attention of the Academy and/or Trust under this policy that may require investigation and/or disciplinary action, enabling reasonable adjustments to be made, in relation to disability, in regard to pupils, employees, parents / carers and visitors to Place Partnership / Academy.

EMPLOYEES

Employees should report all concerns about suspected wrongdoing within the workplace (excluding any related to their own contract of employment) which come to their attention during their employment, providing that they have a reasonable belief that their concerns are accurate and

that it is in the public interest that those concerns should be subject to further scrutiny. Where possible, employees should put their name to any whistleblowing disclosures made and fully participate in any investigation following a whistleblowing disclosure made by them.

HUMAN RESOURCES (HR)

HR will provide advice and guidance to Executive Leaders and Principals, Senior Leaders, and employees regarding the application of this policy. HR will provide support to any investigation and/or disciplinary action that may be instigated as a result of a concern brought to the attention of an Academy or Place Partnership under this policy.

3. AIMS

The aim of this policy is to encourage employees and others who have serious concerns about any aspect of Place Partnership's work to come forward and voice those concerns.

Place Partnership is committed to becoming an outstanding educator and achieving the highest possible ethical standards in its communities and in all of its practices. To help achieve these standards it encourages freedom of speech.

If an employee is considering raising a concern, they should read this policy first. It explains:

- The type of issues that can be raised;
- How the person raising a concern will be protected from victimisation and harassment;
- How to raise a concern, and what Place Partnership will do.

UNDERSTANDING WHISTLEBLOWING

Whistleblowing is the reporting of concerns about wrongdoing, malpractice, risks, or illegal activity that affect others or the wider public interest. Examples may include but are not limited to safeguarding concerns, fraud, financial irregularities, serious breaches of health and safety, unlawful conduct, abuse of authority, environmental damage, discrimination, harassment or victimisation, including sexual harassment (where requirements for a protected disclosure are met) or attempts to conceal any of these matters.

Whistleblowing is different from a grievance. A grievance is a concern about an individual's own employment, working conditions, treatment at work, terms and conditions, relationships with colleagues, or management decisions that affect them personally. Such concerns should normally be raised through the Grievance Policy.

In some cases, a concern may involve both personal and public interest issues. Where this occurs, Place Partnership will consider the nature of the concern and advise the employee of the most appropriate process to follow.

SUPPORT FOR EMPLOYEES AND MANAGERS

Place Partnership recognises that raising or managing a whistleblowing concern can be difficult and potentially stressful for everyone involved. Employees who raise concerns in good faith will be treated

seriously, supported throughout the process, and protected from victimisation, harassment, retaliation, or any other detriment.

Managers who receive whistleblowing disclosures also have a responsibility to ensure concerns are handled appropriately, confidentially, fairly, and in line with this policy. Advice and support are available to managers where required.

Employees may seek support from their trade union representative/professional association, or the HR Shared Services Team at hr@placepartnership.com.

If an employee is unsure whether to use this policy or they wish to seek independent advice at any stage, they may contact the independent charity 'Protect' by visiting their website at [Protect | Speak Up, Stop Harm](#). Their advisers can give free confidential advice on how to raise a concern about serious malpractice at work.

This policy is designed to ensure that employees can raise their concerns about wrongdoing or malpractice within Place Partnership without fear of victimisation, subsequent discrimination, disadvantage, or dismissal.

It is also intended to encourage and enable employees to raise serious concerns within Place Partnership rather than ignoring a problem or 'blowing the whistle' outside.

This policy aims to:

- Encourage employees to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice.
- Highlight that failure to report a concern relating to the wellbeing of children could be seen as a failing in professional duty for some employees and be a breach of legislation, statutory guidance, professional standards or safeguarding responsibilities. Such matters may be subject to investigation and, where appropriate, could result in possible disciplinary action.
- Provide avenues for employees to raise concerns and receive feedback on any action taken.
- Ensure that employees receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied.
- Reassure employees that they will be protected from detriment, victimisation or reprisal where they raise a concern with a reasonable belief that the information disclosed tends to show wrongdoing and that the disclosure is being made in the public interest. Employees will not be required to prove that the concern is true before raising it. However, knowingly making a false allegation or raising concerns maliciously may result in disciplinary action.

4. SCOPE OF THIS POLICY

This policy is intended to enable those who become aware of wrongdoing within Place Partnership affecting a pupil, student, employee, or some other person, to report their concerns at the earliest opportunity so that they can be properly investigated.

Keeping Children, Safe in Education requires staff to have access to appropriate whistleblowing procedures where safeguarding concerns are not being addressed appropriately. Concerns relating to the safety or welfare of children should normally be reported immediately in accordance with the Trust's Safeguarding and Child Protection Policy and may also be raised under this Whistleblowing Policy.

5. WHO CAN RAISE A CONCERN UNDER THIS POLICY

This policy applies to all:

- Employees of Place Partnership
- Employees of contractors working for Place Partnership, for example, agency staff, contractors, and drivers
- Employees of suppliers
- Members, Trustees and AEC governors
- Voluntary workers working with Place Partnership.

6. WHAT SHOULD BE REPORTED

Any serious concerns that arise about the curriculum or the conduct of employees of Place Partnership or others acting on behalf of Place Partnership that:

- Make you feel uncomfortable in terms of known standards.
- Are not in keeping with Place Partnership's policies and procedures.
- Fall below established standards of practice; or are improper behaviour.

These might relate to:

- Conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation).
- Disclosures related to miscarriages of justice.
- Racial, sexual, disability or other discrimination.
- Health and safety of the public and/or other employees/pupils.
- Damage to the environment, or intention to damage the environment.
- Unauthorised use of public / trust funds or other assets.
- Possible fraud and corruption.
- Deliberately covering up any of the above; or Place Partnership or any associated person within Place Partnership has been, is being or is likely to be receiving or offering bribes.
- Other unethical conduct.

This list is not exhaustive.

7. PRESCRIBED PERSONS

The Public Interest Disclosure (Prescribed Persons) Order 2014 sets out a list of over 60 organisations and individuals that a worker may approach outside their workplace to report suspected or known wrongdoing.

For the Education Sector these organisations are:

Ofsted

Piccadilly Gate
Store Street
Manchester
M1 2WD

Tel: 0300 123 3155

<https://contact.ofsted.gov.uk/online-complaints-schools>

Office of Qualifications and Examinations Regulation (Ofqual)

about matters in relation to which the Office of Qualifications and Examinations Regulation exercise functions under the Apprenticeships, Skills, Children and Learning Act 2009.

Complaints and Investigations Manager Ofqual

Earlsdon Park

53 – 55 Butts Road

Coventry

CV1 3BH

Tel: 0300 303 3346

<https://complaints.ofqual.gov.uk/>

Secretary of State for Education

Ministerial and Public Communications Division

Department for Education

Piccadilly Gate

Store Street

Manchester

M1 2WD

Tel: 0370 000 2288

[Contact the Department for Education \(DfE\) - GOV.UK](https://gov.uk)

Other prescribed organisations that may be of use include:

- Health & Safety Executive (HSE)
- Information Commissioner's Office (ICO)
- Charity Commission
- National Audit Office (where relevant)
- Teaching Regulation Agency (TRA)
- DfE Academy Financial Compliance

The purpose of a prescribed person provides employees with a mechanism to make their public interest disclosure to an independent body that may be able to act on them. An employee will potentially qualify for the same employment rights as if they had made a disclosure to their employer if they report to a prescribed person. In order to qualify for this right, as well as meeting the criteria set out above, the employee must have a reasonable belief that:

- When a whistle blower makes a disclosure to a prescribed person they escalate the issue beyond their employer, as those with investigatory and regulatory functions can consider acting upon the information that has been disclosed to them.
- The prescribed person needs to decide, and clearly communicate, whether they limit their role to the receipt of protected disclosures only or are accepting of a wider range of non-protected disclosures. This will depend on the prescribed person's statutory functions beyond the whistleblowing legislation.
- The prescribed person is not responsible for deciding whether the individual who has made the disclosure qualifies for protection. Ultimately this will be decided by the employment tribunal in contested cases.

Place Partnership benefits from an open whistleblowing culture; for example, by having this policy established and readily available to all employees, it is more likely that concerns will be raised internally, which reduces the likelihood of escalation to an Ofsted or the Exam Regulator.

8. PROTECTING THE WHISTLEBLOWER

LEGAL RIGHTS

This policy has been developed in accordance with the Public Interest Disclosure Act 1998, as amended by subsequent legislation. Individuals who make a protected disclosure are entitled to legal protection where they reasonably believe that the information disclosed tends to show wrongdoing and that the disclosure is in the public interest. A disclosure does not need to be proven to be true, provided the individual had a reasonable belief in the information at the time it was reported.

The Trust will not dismiss, disadvantage, victimise or subject any individual to detriment for raising genuine concern under this policy. Protection applies even where an investigation concludes that no wrongdoing has occurred, provided the concern was raised with a reasonable belief and in the public interest.

HARASSMENT OR VICTIMISATION

Place Partnership is committed to good practice and high standards and to being supportive of all employees.

Place Partnership recognises that the decision to report a concern can be a difficult one to make. If an employee honestly and reasonably believes what they are saying is true, they should have nothing to fear because they will be doing their duty to their employer, colleagues, and those for whom they are providing a service.

Place Partnership will not tolerate any harassment or victimisation of a whistleblower (including informal pressures) and will take appropriate action to protect the whistleblower when a concern is raised with a reasonable belief and in accordance with this policy and will treat this as a serious disciplinary offence, which will be dealt with under Place Partnership Disciplinary Policy.

SUPPORT TO EMPLOYEES

Throughout this process:

- Employees will be given full support from their designated line manager within the Academy Senior Leadership Team, Shared Services, or other designated leader,
- Concerns will be taken seriously; and
- Place Partnership will do all it can to help employees throughout the investigation.

If appropriate, Place Partnership will consider temporary re-deployment or adjustment to duties as may be required for the period of the investigation in order to aid the conclusion of an objective investigation being carried out or as a means to support the employee making the disclosure.

CONFIDENTIALITY

Employees should feel able to voice whistleblowing concerns openly under this policy. However, if employees wish to raise their concern confidentially, Place Partnership will make every effort to keep the employee's identity secret. If it is necessary for anyone investigating the concern to know the employee's identity, this will be discussed with the employee before that disclosure is made.

Notwithstanding the above, employees should be aware that a proper investigation may be more difficult or impossible if the employee wishes to remain anonymous or if further information cannot be obtained from the employee.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Executive Leader / Principal, or the next most Senior Manager and appropriate measures will be taken to preserve confidentiality.

ANONYMOUS ALLEGATIONS

This policy encourages employees to put their name to the allegation(s) whenever possible. If the employee does not tell Place Partnership who they are it will be much more difficult for Place Partnership to protect the employee's position or to give feedback. This policy is not ideally suited to concerns raised anonymously.

However, concerns raised anonymously will still be considered and handled appropriately, consistently and fairly in accordance with this policy.

Concerns expressed anonymously may be more difficult to fully investigate, but they may be considered at the discretion of Place Partnership.

Where a concern is raised anonymously, Place Partnership may be limited in its ability to seek further information, provide feedback on the outcome, or offer individual support and protection measures. In exercising this discretion, the factors to be taken into account would include:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation(s) from other sources.

MALICIOUS ACTIONS

The Trust encourages individuals to raise concerns without fear of reprisal. No action will be taken against an individual who raises a concern that is not subsequently substantiated, provided the concern was raised honestly, with a reasonable belief in the information disclosed and in the public interest. However, where an individual is found to have knowingly made a false allegation, acted maliciously, or sought personal gain through deliberately misleading information, disciplinary action may be considered.

RAISING A CONCERN

Who should concerns be raised with?

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. Employees should normally raise concerns with their immediate Line Manager in the first instance, a senior leader or the HR Department.

If the concern is about an Executive Leader or a Principal, the concern should be raised with the CEO. If the concern is about the CEO it should be raised with the Chair of the Board of Trustees. Concerns relating to the Chair of Trustees should be reported to the Vice Chair or Trust Members. Concerns relating to Trust Members should be reported to the Trust's external auditors or the DfE where appropriate.

They will decide how the investigation will proceed. This may include external investigation.

If unsure who to contact, you may call the independent charity Protect at [Protect | Speak Up, Stop Harm](#).

How to raise a Concern

Concerns can be raised by telephone, in person or in writing. The earlier concerns are expressed, the easier it is to take action. The following information should be provided:

- The nature of the concern and why you believe it to be true;
- The background and history of the concern (giving relevant dates).

Employees are not expected to prove the truth of a concern before raising it. However, they should have a reasonable belief that the information disclosed indicates wrongdoing and that raising the concern is in the public interest. The Trust will assess the information provided and determine whether further enquiries or an investigation are required.

Employees may wish to consider discussing their concern with a colleague first and they may find it easier to raise the matter if there are two (or more) who have had the same experience or concerns.

Employees may invite their trade union, professional association representative, or a work colleague to be present for support during any meetings or interviews in connection with the concerns raised.

Reporting Concerns about Examinations

In compliance with section 5.11 of the JCQ's General Regulations for Approved Centres¹, Place Partnership will:

- Take all reasonable steps to prevent the occurrence of any malpractice (which includes maladministration) before, during and after assessments have taken place.

¹ Reference www.jcq.org.uk/exams-office/general-regulations/

- Inform the awarding body immediately of any alleged, suspected, or actual incidents of malpractice or maladministration, involving a candidate or a member of staff, by completing the appropriate documentation.
- As required by an awarding body, gather evidence of any instances of alleged or suspected malpractice (which includes maladministration) in accordance with the JCQ publication suspected malpractice: policies and procedures² and provide such information and advice as the awarding body may reasonably require.

If a member of centre staff involved in the management, administration and / or conducting of examinations (such as exams officer, exams assistant or invigilator), a pupil / student or a member of the public (such as a parent / carer) has a concern or reason to believe that malpractice has or will occur in an examination or assessment, concerns should be raised initially with the relevant staff member with responsibility for oversight of examination administration.

However, there may be times when it may be more appropriate to refer the issue direct to the governing board, most often when the allegation is against the Head of Centre.

EXAMPLES OF MALPRACTICE

Exams related breaches in addition to the centre wide Whistleblowing Policy, this exams-specific policy, includes reference to exams-related breaches including, but not limited to, the following:

- Failure to comply with exam regulations as set out by the Joint Council for Qualifications (JCQ) and its awarding bodies.
- A security breach of the examination paper.
- Conduct of centre staff which undermines the integrity of the examination.
- Unfair treatment of candidates by either giving an advantage to a candidate / group of candidates (e.g. by permitting a candidate an access arrangement which is not supported by appropriate evidence), or disadvantaging candidates by not providing access to the appropriate conditions (providing a 'level playing field').
- Possible fraud and corruption (e.g. accessing the exam paper prior to the exam to aid teaching and learning).
- Abuse of authority (e.g. the Head of Centre /members of the Senior Leadership Team overriding JCQ and awarding body regulations).
- Other conduct which may be interpreted as malpractice / maladministration.

PROVIDING INFORMATION TO SUPPORT CONCERNS

In order to investigate concerns effectively, the awarding body should be provided with as much information as possible/is relevant, which may include:

- The qualifications and subjects involved;
- The centre involved;
- The names of staff / candidates involved;
- The regulations breached / specific nature of suspected malpractice;
- When and where the suspected malpractice occurred;

² Reference www.jcq.org.uk/exams-office/malpractice/

- Whether multiple examination series are affected;
- If the issue has been reported to the centre and any outcome;
- How the issue became apparent.

9. WHAT WILL PLACE PARTNERSHIP DO

Place Partnership will respond to concerns as quickly as possible. Do not forget that testing concerns is not the same as either accepting or rejecting them.

The overriding principle for Place Partnership will be the public interest. In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases, however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Employees who are suspended will be supported throughout the process in accordance with the Trust's Disciplinary Policy and may access wellbeing support through the Place Plus portal, via the Place Partnership SharePoint site or by contacting HR at hr@placepartnership.com. Protection of others is paramount in all cases.

Where appropriate, the matters raised may:

- Be investigated by the Senior Leadership Team or Place Partnership Leadership Team through the disciplinary/grievance process.
- Be referred to the police.
- Be referred to an external auditor.
- Be referred and put through established child protection/abuse procedures; form the subject of an independent inquiry.

Within five working days of a concern being raised the employee will receive an acknowledgement that the concern has been received.

Within ten working days, the person investigating the concern will write to the employee raising the concern and do the following:

- Indicate how Place Partnership proposes to deal with the matter including any actions taken up to that point.
- Supply information on staff support mechanisms and the name of a "contact officer" who they can liaise with if concerns or issues arise as a consequence of them making a disclosure.
- Provide an estimate of how long it will take to provide a final response and why it will take this long.
- Confirm whether further investigations will take place and if not, why not.

The amount of contact between the employee and the designated senior leader considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of information. It is likely that a meeting will be arranged with the employee to ensure that their disclosure is fully understood.

A status update will be provided at least once every 14 days until the matter is resolved.

Any meeting can be arranged away from the workplace, if that is preferable of the employee, and a union or professional association representative or a work colleague may accompany the employee to provide support.

Place Partnership will do what it can to minimise any difficulties that employees may experience as a result of raising a concern. For instance, if employees are asked to give evidence in criminal or disciplinary proceedings, Place Partnership will arrange for appropriate advice and support.

Employees need to be assured that disclosures have been properly addressed. Unless there are any legal reasons why this cannot be done, employees will be kept informed of the progress and outcome of any investigation.

10. HOW THE MATTER CAN BE TAKEN FURTHER

This policy is intended to provide all employees of Place Partnership with an avenue within Place Partnership to raise concerns. Whilst Place Partnership cannot guarantee that every employee will receive their desired outcome, the employee's concern will be dealt with fairly and appropriately and it is hoped that the outcome will be satisfactory.

However, if the employee is not happy and feels that they need to take the matter further, they can use the following contacts:

- Trade Union
- The Health and Safety Executive (HSE)
- Place Partnership HR Department
- Solicitor
- Police
- Public Concern at Work
- The Department for Business, Innovation and Skills (www.gov.uk)
- Ofsted
- Ofqual
- The Department for Education.

If an employee raises concerns outside of Place Partnership, they should ensure that it is to one of these prescribed contacts. A public disclosure to anyone else could take an employee outside the protection of the Public Interest Disclosure Act and of this policy.

Employees should not disclose information that is confidential to Place Partnership or to anyone else, such as a client or contractor of Place Partnership, except to those included in the list of prescribed contacts.

This policy does not prevent employees from taking their own legal advice.

11. RECORDING AND MONITORING

The HR Department will maintain a Trust register containing all concerns that are brought to their attention under this policy. All leaders allocated to look into a concern must ensure the HR Department is provided with sufficient details for the register. The Chief People Officer will report to the CEO and Trustees as required.

12. DATA PROTECTION

Place Partnership processes personal information/data collected in the application of this Whistleblowing Policy in accordance with its legal obligations set out in the UK GDPR and Data Protection Act 2018, which are confirmed within Place Partnership's Data Protection Policy.

Information/data specifically obtained to address issues raised under this Whistleblowing Policy is held securely and accessed by, and disclosed to, individuals only for the purposes of addressing these issues. Inappropriate access or disclosure of an employee's personal information/data constitutes a data breach and should be reported in accordance with Place Partnership's Data Protection Policy immediately. It may also constitute a matter which will be considered in accordance with Place Partnership's Disciplinary Policy.

13. CONCLUSION

Place Partnership will endeavour to uphold the aims of this policy and wishes to create a culture that is open and transparent and committed to ensuring employees and others who have serious concerns about any aspect of Place Partnership's work are able to come forward and voice those concerns without fear.

14. REVIEW

Place Partnership will review this policy in consultation with recognised trade unions on a biennial basis and at any such other time should changes to Employment Legislation or recommended Codes of Practice dictate necessary changes.

15. CONTACT INFORMATION

Name	Email / Website:
Ofsted	https://contact.ofsted.gov.uk/online-complaints-schools
Ofqual	https://complaints.ofqual.gov.uk/
Department for Education	www.gov.uk/contact-dfe
Protect	Protect Speak Up, Stop Harm