



EMMAUS

CATHOLIC MAC

Whistleblowing Policy

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Post holder responsible	Chief Executive Officer



Commitment to Equality:

We are committed to providing a positive working environment which is free from prejudice and unlawful discrimination and any form of harassment, bullying or victimisation. We have developed a number of key policies to ensure that the principles of Catholic Social Teaching in relation to human dignity and dignity in work become embedded into every aspect of school life and these policies are reviewed regularly in this regard.

This Whistleblowing Policy has been approved and adopted by all school in Emmaus Catholic Multi Academy Company on 21st August 2025 and will be reviewed in August 2026.

Signed by Director of Emmaus MAC: *J Griffin*

Signed by CEO for Central Team: *S Horan*

This statement relates to all Emmaus schools and settings.

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1. Statement of intent

Emmaus Catholic Multi Academy Company (MAC) is committed to open and honest communication and ensuring the highest possible standards in integrity – we will always treat whistleblowing as a serious matter.

In line with the MAC’s commitment to openness, probity and accountability, members of staff are encouraged to report concerns. This policy will work to ensure that, if an employee sees or suspects that something is wrong, they will raise this with the school/setting. This is known as “blowing the whistle” – a phrase that is used throughout this policy and should be viewed as a positive action of speaking up.

This policy seeks to ensure that any member of staff who suspects malpractice knows how to raise concerns and what procedures are in place to deal with the concern.

Where this policy necessitates personal or special category data to be processed, it will be done so in accordance with the MAC Data Protection Policy. This policy will not be confused with the procedure on dealing with harassment at work or the MAC Grievance Resolution Policy and Procedure and Disciplinary Policy and Procedure.

This policy will:

- Give confidence to members of staff when raising concerns about conduct or practice that is potentially illegal, corrupt, improper, unsafe or unethical, or which amounts to malpractice or is inconsistent with school standards and policies.
- Provide members of MAC staff with avenues to raise concerns.
- Ensure that members of staff receive a response to the concerns they have raised and feedback on any action taken.
- Offer assurance that members of staff are protected from reprisals or victimisation for whistleblowing action undertaken in good faith and within the meaning of the PIDA.

Under this policy, any of the following can raise a concern:

- Employees working in Emmaus Catholic MAC schools and settings
- Voluntary workers working within Emmaus Catholic MAC schools and settings
- Trainees, such as student teachers

2. Legal framework

This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:

- Public Interest Disclosure Act 1998
- Employment Rights Act 1996
- Academy trust handbook
- DfE 'Keeping children safe in education
- GOV.UK (2012) 'Whistleblowing for employees'
- Sir Robert Francis (2015) 'Freedom to speak up report'

This policy operates in conjunction with the following MAC policies:

- Disciplinary Policy and Procedure
- Records Management Policy
- Complaints Policy
- Data Protection Policy
- Grievance Resolution Policy and Procedure

3. The Public Interest Disclosure Act

The Public Interest Disclosure Act 1998 (PIDA) protects employees who “blow the whistle” where the employee reasonably believes that the disclosure falls within the remit of the prescribed person or body, and that the information and any allegations are substantially true. Disclosures made under this procedure will be monitored for statistical purposes as required under the PIDA. The details of any disclosure will remain confidential.

The (Executive) Principal is the first point of contact for whistleblowing queries in a school and the CEO for whistleblowing queries for Central team. If the allegation is related to the (Executive) Principal, the concern should be raised with the CEO. If the allegation is related to the CEO, the concern should be raised with the MAC named Director for Whistleblowing listed at the end of this policy. If the allegation is related to a member of the Local Governing Body or a Director the concern should be raised with the Named Director for Whistleblowing.

Any member of the school community or the general public is able to “blow the whistle”; however, the PIDA only protects employees. The ‘Non-employees’ section of this policy includes further details on how whistleblowing affects non-employees.

4. Definitions

“Whistleblowing” is when an employee reports suspected wrongdoing, or ‘qualifying disclosures’, at work to their employer.

As outlined by the PIDA, **“qualifying disclosures”** pertain to when any of the following takes place:

- A criminal offence has been committed, is likely to be committed or is being committed
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject
- A miscarriage of justice has occurred, is occurring or is likely to occur
- The health or safety of any individual has been, is being or is likely to be endangered
- The environment has been, is being or is likely to be damaged
- Information tending to show any matter falling within any of the preceding points has been, is being or is likely to be deliberately concealed

“In the public interest” means that an individual acted outside of their own personal interest – they acted for more than personal gain. It is not necessary for the disclosure to be of interest to the entire public. The following considerations are often used as a test to establish whether something is within the scope of public interest:

- The number of people in the group whose interests the disclosure served
- The nature of the interests and the extent by which individuals are affected by the wrongdoing disclosed

- The nature of the wrongdoing disclosed
- The identity of the alleged wrongdoer

“Blacklisting” refers to an individual who is being refused work because they are viewed as a whistleblower.

“Grievances” involve someone filing a complaint because they personally have been mistreated in some way – the person making the complaint will have a direct interest in the outcome. It is important to understand the difference between raising a grievance and blowing the whistle.

5. Roles and responsibilities

The MAC Board of Directors will be responsible for:

- Establishing and agreeing the whistleblowing procedure.
- Ensuring the agreed whistleblowing procedure is published on the MAC website.
- Monitoring the effectiveness of this policy and undertaking any necessary reviews, e.g. in relation to good practice recommendations or changes in legislation.
- Ensuring all members of the MAC community have access to this policy.
- Investigating, in liaison with the CEO/(Executive) Principal any concerns that are raised.
- Ensuring this policy provides an open and transparent framework where employees of the school can raise their concerns.
- Taking the necessary action against members of staff following an investigation into any alleged malpractice.
- Ensuring that the minutes of the relevant MAC Committee and each school’s Local Governing Body include a record of the MAC whistleblowing arrangements and who, both internally and externally, staff members should report concerns to.
- Appointing one named Director and one member of staff for schools and the Central Team to act as points of contact for staff members when reporting concerns.
- Ensuring that all concerns raised by whistleblowers are responded to properly and fairly.
- Ensuring that whistleblowing forms part of the staff Code of Conduct as part of a wider approach to having in place appropriate safeguarding policies and procedures.

The (Executive) Principal in schools and CEO for the Central Team will be responsible for:

- Ensuring all members of staff have read and understood this policy.
- Receiving, investigating and responding to any concerns that have been raised by MAC staff.
- Being the first point of contact regarding whistleblowing.

The CEO will be responsible for receiving any concerns raised about the (Executive) Principals and the named Director for receiving any concerns about the CEO, Directors or Local Governing Body members.

All members of staff will be responsible for:

- Raising any concerns that meet the definitions in the 'Definitions' section of this policy.
- Being truthful and reasonable with any concerns that they have.
- Not raising malicious or unfounded concerns.

6. Harassment and victimisation of staff

The MAC recognises that the decision to report a concern can be a difficult one to take, not least because of the fear of reprisal from those responsible for the malpractice or from the school/setting as a whole; however, the MAC will not tolerate any such harassment or victimisation and will take appropriate action to protect staff who raise a concern in good faith.

Staff are protected in law by the PIDA, which gives employees protection from detriment and dismissal where they have made a protected disclosure, providing the legal requirements of the Act are satisfied, e.g. the disclosure was in the public interest.

Any member of staff who victimises or harasses a member of staff as a result of their having raised a concern in accordance with this policy will be dealt with under the MAC Disciplinary Policy and Procedure.

7. Non-employees

The PIDA and the Employment Rights Act 1996 do not protect non-employees as far as whistleblowing is concerned. Irrespective of this, the MAC will not allow harassment, dismissal or exclusion for any non-employee who raises a genuine concern.

Where an individual feels that they have been unfairly treated following blowing the whistle, they should make a complaint under the MAC Complaints Policy.

Directors and Local Governing Body members are not employees and, while they are responsible for ensuring there is a whistleblowing procedure in place, they are not protected under the PIDA.

8. Good practice principles

The MAC will implement the core whistleblowing principles, as outlined in the 'Freedom to speak up report', to ensure that whistleblowing procedures are fair, clear and consistent.

The MAC will ensure the following principles are reflected in our ethos and values – there will be a culture:

- Of safety in Emmaus Catholic MAC schools and settings.
- Where people feel confident with raising concerns.

- Free from bullying.
- Of visible leadership.
- Of valuing staff.
- Of reflective practice.

By providing a clear procedure for mediating and resolving cases, as outlined in the 'Procedure' section of this policy, the Emmaus Catholic MAC schools and settings will ensure that all cases are efficiently handled. This procedure includes:

- How to raise and report concerns.
- How investigations will be conducted.
- How the school will mediate and resolve disputes.

The MAC will implement **measures to support good practice** by ensuring adherence to the following principles:

- Offering relevant training to staff
- Providing the necessary support to staff
- Providing support to staff who are seeking alternative employment
- Being transparent
- Being accountable
- Conducting an external review of any concerns raised, where necessary
- Undertaking regulatory action as required
- Informing staff what protection is available to them if they report someone
- Ensuring that alternative whistleblowing channels are in place for members of staff who feel unable to raise an issue with their employer

The MAC will ensure there are **particular support measures in place for vulnerable groups** by adhering to the following principles:

- Ensuring non-permanent staff are taught, and receive training on, the same principles as permanent staff
- Ensuring trainees are subject to all the safeguarding and whistleblowing principles
- Ensuring staff from ethnic minorities are supported, as they may feel particularly vulnerable when raising concerns
- Ensuring staff are empowered and protected, enabling them to raise concerns freely

9. Procedure

When raising concerns, individuals will express them preferably in writing to:

The (Executive) Principal in a school and the CEO for whistleblowing queries for Central team. If the allegation is related to the (Executive) Principal, the concern should be raised with the CEO. If the allegation is related to the CEO, the concern should be raised with the MAC named Director for Whistleblowing listed at the end of this policy. If the allegation is related to a member of the Local Governing Body or a Director the concern should be raised with the Named Board Director for Whistleblowing.

When individuals raise their concern, they will include the following information as far as possible:

- The background and history of the concern
- Any relevant names, dates and places
- The reasons for the concern

The MAC encourages individuals to let their identity be known when they raise concerns, as anonymous concerns can be challenging to investigate.

Individuals who would like to seek professional and confidential advice should contact Protect, a registered charity that advises on whistleblowing queries. The Protect website can be accessed [here](http://www.protect-advice.org.uk) (www.protect-advice.org.uk), or they can be contacted on 020 31172520.

Once an individual has raised a concern, the MAC will be responsible for investigating it.

Employees are encouraged to exhaust all internal procedures before contacting external agencies. This whistleblowing policy is designed to reduce the need for external disclosure and to encourage co-operation, cohesiveness and honesty.

In certain instances, however, it may be appropriate for the individual to raise the concern with an outside agency, e.g. the police, depending on the severity of the concern. Equally, it may be appropriate for the individual to request that their recognised trade union raises the matter.

Appropriate whistleblowing procedures will be put in place for concerns about poor or unsafe practice and potential failures in any MAC school's safeguarding system should be raised with the Principal/DSL.

If a member of staff feels like they are unable to raise a safeguarding-related concern with the school, or feels that their genuine concerns are not being addressed, they are able to contact the NSPCC Whistleblowing Helpline on 0800 028 0285 or the LADO.

One option for external whistleblowing is via 'prescribed persons'. Prescribed persons are mainly regulators and professional bodies. A complete list of prescribed persons can be found at: gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies

The MAC school, or the appropriate external agency, will acknowledge receipt of a disclosure but, unless additional information is required, will not contact or engage in dialogue with the whistleblower, as this may undermine the legitimacy of the investigation outcome.

10. Interview and investigation

The (Executive) Principal/CEO or named Director for Whistleblowing, as relevant, will write to the individual within 10 working days of the initial meeting to confirm that the concern has been received, as well as to indicate proposals for dealing with the matter.

The initial stage will be an interview with the whistleblower, and then an assessment of further action will be discussed. During this initial stage, the (Executive) Principal/CEO or named Director for Whistleblowing, as appropriate, will establish if:

- There are grounds for a concern and that it is genuine.
- The concern was raised in accordance with this policy.

During the initial interview, the (Executive) Principal/CEO or named Director for Whistleblowing, as appropriate, will request the individual puts their concern in writing, if they have not already done so. The (Executive) Principal/CEO or named Director for Whistleblowing, as relevant, will write a summary of the concern if the individual is unable to put it in writing.

The (Executive) Principal/CEO or named Director for Whistleblowing, as relevant, will explain the following to anybody raising a concern:

- How they will communicate with them throughout the process. It should be noted, the need for confidentiality may prevent the MAC/school giving the person raising the concern specific details of any necessary investigation or any necessary disciplinary action taken as a result of the concern.
- That their identity will be kept confidential from the alleged wrongdoer.
- That the MAC will do everything in its power to protect the person raising the concern from discrimination.
- That if the concern is genuine, even if the concern is not confirmed, no disciplinary action will be taken against the person raising the concern.

If clear evidence is uncovered that the concern raised is malicious or unfounded, disciplinary action may be brought against the person raising the concern.

If an investigation is carried out, the whistleblower will be informed of the final outcome.

A record will be kept of the seriousness of the issues raised and the credibility of the concern. All records will be kept confidential and will be stored in line with the MAC's Records Management Policy.

It may be possible for the concern to be resolved by simply agreeing the necessary action or explaining procedures to the alleged wrongdoer; however, depending on the severity and nature of the concern, it may:

- Be investigated by management, an internal audit or through the disciplinary process.
- Be referred to the police or an external auditor.
- Form the subject of an independent inquiry.

If the investigating officer needs to talk to the whistleblower, they are permitted to be accompanied by a recognised trade union representative or a fellow member of staff not involved in the area of work that the concern relates to. This person will provide support only and will not be allowed to become involved in the proceedings.

A record will be made of the nature and outcome of the concern. The purpose of this is to ensure that a central record is kept which can be cross-referenced with other complaints to monitor any patterns of concern across the school and to assist in monitoring the procedure.

The whistleblower will be informed of the results of the investigation, and any action that is proposed will be subject to third party rights. It should be noted that the need for confidentiality may prevent the MAC/school giving the person raising the concern specific details of any necessary investigation or any necessary disciplinary action taken as a result of the concern. Where action is not taken, the individual will be given an explanation.

11. What the MAC asks of whistleblowers

The purpose of this policy is to enable individuals to raise concerns in confidence, without any fear of reprisal. It is important that whistleblowers:

- Do not talk about the concern outside the MAC/school unless it is to report the concern through the proper external channels, e.g. the LA.
- Declare any personal interest in the matter, as the policy is designed to be used in the interest of the public and not for individual matters.

12. Appeal process

If the individual is not satisfied with the way the matter has been handled, they can make a complaint under the Emmaus Catholic MAC Complaints Policy.

13. Unfair treatment

An individual can take a case to an employment tribunal if they feel that they have been treated unfairly as a result of whistleblowing. Further information can be sought from the [Citizen's Advice Bureau](#), the whistleblowing charity [Protect](#), or from an individual's trade union.

Any claims of unfair dismissal needs be made within three months of the investigation ending.

14. Anonymous Allegations

It may be appropriate for anonymous complaints to be made although employees are encouraged to make their identity known. Concerns expressed anonymously will still be investigated but the process may be hampered if there need to be follow-up enquiries but the employee making the

disclosure cannot be contacted.

If an employee makes an anonymous allegation, it can be more difficult for them to qualify for protection as a whistleblower. This is because there would be no documentary evidence linking the worker to the disclosure for a tribunal to consider.

In the case of an anonymous allegation, the following factors will be taken into account when establishing the scope and depth of the investigation:

- the seriousness of the issues raised
- the credibility of the concern
- the likelihood of confirming the allegation from attributable sources and information.

Employees can make a disclosure via their trade union rather than personally, in order to further maintain confidentiality. In this circumstance the employee making the disclosure will still be protected by the workers' legal right to make a protected disclosure to certain third parties under the Public Interest Disclosure Act 1998 (PIDA), as incorporated into the Employment Rights Act 1996.

The trade union representative whom the employee approaches will also have protection given to complainants under PIDA – provided they act in accordance with this procedure.

15. Monitoring and review

The MAC Board of Directors will review this policy annually, ensuring that all procedures are up-to-date.

Any changes made to this policy will be communicated to all members of staff.

16. Contact Details

The Chief Executive Officer (CEO) of Emmaus Catholic Multi Academy Company can be contacted at the address below:

Mrs S Horan
Chief Executive Officer/Accounting Officer
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Named Director for Whistleblowing

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