



THE WHITE HILLS PARK TRUST

Whistleblowing Policy

Version control

Scope:	Applicable to all Trust Schools
Review date:	Spring Term 2027
Statutory or non-statutory:	Statutory
Author/Reviewer:	Sue Angood – HR Director
Updates as of October 2025	Includes new contact list for public disclosures, new category (sexual harassment) from April 2026, reporting form and decision flowchart.
Updates June 2026	Policy name. Reporting a concern. Reference to Public Interest Disclosure Act.

INTRODUCTION

The White Hills Park Trust are committed to providing services with the utmost integrity. However, the Chief Executive Officer and the Trustees recognise that all organisations face the risk of wrongdoing, or of unethical conduct happening within the organisation, which they are not aware of. The Trust recognise that an employee may be the first to realise if something is wrong within The White Hills Park Trust. However, they may not want to express their concerns because they feel that speaking up would somehow be disloyal to their colleagues or to the Trust. The Trust wish to encourage a culture which is open and honest and it hopes that any concerns would be identified and spoken about while they still remain at a low-level, however, like any large organisation, the Trust recognise that issues may arise that the Trust has not been aware of. This policy aims to protect both those who wish to speak out and the Trust.

It is important for staff to know that The White Hills Park Trust is committed to the highest possible standards of openness, probity, and accountability. Part of meeting that commitment is to encourage employees and others with concerns about any aspect of the Trust's work to feel able to come forward and voice those concerns. The White Hills Park Trust recognises the need for confidentiality and the fact that the majority of cases will have to proceed on a confidential basis.

What is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. In line with section 43B of the Employment Rights Act 1996, this may include:

- (a) criminal activity
- (b) failure to comply with a legal or professional obligation
- (c) miscarriage of justice
- (d) danger to health and safety of an individual
- (e) damage to the environment
- (f) deliberate concealment of any of the above matters
- (g) sexual harassment (from April 2026)

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the Trust's activities, you should report it under this policy.

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.

Any member of the school community or the general public is able to "blow the whistle"; however, the PIDA only protects employees. Irrespective of this, the Trust will not allow harassment, dismissal or exclusion for any non-employee who raises a genuine concern.

AIMS OF THE POLICY

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

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;
- provide avenues for them to raise those concerns and receive feedback on any action taken;
- ensure that they receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied;
- reassure them that they will be protected from possible reprisals or victimisation if they have made any disclosure about wrongdoing in the reasonable belief that it is in the public interest

SCOPE OF THE POLICY

The policy is not intended to replace existing procedures, for example:

- if the concern relates to someone's own treatment as a employee, including complaints relating to a management decision or terms and conditions, they should raise this under the existing grievance or anti-harassment procedure, as appropriate.
- if a parent or other user of the Trust has a concern about services provided, they should raise this as a complaint to the Trust;

WHO CAN RAISE A CONCERN UNDER THIS POLICY?

Any employee of the Trust can raise a concern, including supply staff employed directly by the Trust. Other non-employees/volunteers/members of the school community may also raise a concern but are not protected by PIDA. Governors and Trustees are not employees although they are responsible for ensuring there is a whistleblowing procedure in place.

WHAT SHOULD BE REPORTED?

A qualifying disclosure is a disclosure of information that in the reasonable belief of the employee shows a "relevant failure" (as defined by the Employment Rights Act 1996 - see below) **and is made in the public interest**. This 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 employee should report any concerns that they have about service provision or about the conduct of employees or Trustees of the Trust or others acting on behalf of the Trust that:

- make them feel uncomfortable in terms of known standards, or

- are not in keeping with the Trust's regulations and policies, or
- fall below established standards of practice, or
- are improper behaviour

These concerns might relate to any of the following relevant failures:

- (a) criminal activity
- (b) failure to comply with a legal or professional obligation
- (c) miscarriage of justice
- (d) danger to health and safety
- (e) damage to the environment
- (f) deliberate concealment of any of the above matters
- (g) sexual harassment (from April 2026) (See Appendix 2)

WHO TO RAISE A CONCERN WITH AND HOW TO RAISE IT

The Chief Executive Officer is the first point of contact for formal whistleblowing queries. If the disclosure is related to the Chief Executive Officer, the concern should be raised with the Chair of the Trust Board.

A concern can be raised verbally or in writing, and if necessary it can be made confidentially. For a concern being raised in writing, please see Appendix 1. This form may be completed and sent to the Chief Executive Officer in the post or via email to Claire.shaw@whptrust.org

The Central Trust office address is:

The White Hills Park Trust
 Unit 5 (Ground Floor)
 Interchange 25 Business Park
 Nottingham
 NG10 5QG

Any complaint sent via email or post should be **marked 'PIDA – Strictly Private & Confidential, FAO The Chief Executive Officer'** (or **FAO The Chair of Trustees**, should the complaint be regarding the Chief Executive Officer).

If an employee is unsure whether or not to raise a concern or wants confidential advice, they may wish to consult their Trade Union.

Alternatively, they can contact Protect (*formerly Public Concern at Work*) (independent whistleblowing charity).

Advice line: (020) 3117 2520

E-mail: whistle@protect-advice.org.uk

Website: <https://protect-advice.org.uk>

(advice line hours Monday/Tuesday/Thursday: 9.30am – 1pm, 2pm – 5.30 pm)

Anonymous Allegations

This policy encourages employees 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 Trust.

Whilst anonymity may, in some circumstances, be possible to maintain, if the issue is very serious, such as a safeguarding concern or financial mismanagement, it cannot be guaranteed. However, in all cases, the appropriate support will be given to the person raising the concern.

In exercising this discretion, the factors to be considered would include:

- the seriousness of the issue raised
- the credibility of the concern
- the likelihood of confirming the allegation from other sources

Untrue Allegations

Some concerns raised may, when investigated, prove to be groundless. If a concern is raised or an allegation made by an employee reasonably believing it to be true and their concerns are not confirmed by investigation, they should have nothing to fear as the Trust will recognise their genuine motives.

However, should an employee make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against them.

INVESTIGATION AND OUTCOME

Once a concern is raised, an initial assessment will be undertaken to determine whether an investigation is necessary and if it is, the scope of the investigation. It may be necessary to appoint an investigator who will make recommendations including any necessary changes to ensure future wrongdoing is avoided. The Trust will aim to keep the employee informed of progress although on some occasions to preserve confidentiality we may not be able to give them all the details of the investigation or any disciplinary action taken as a result.

Where concerns or allegations fall within the scope of specific Trust procedures, they would normally be referred for consideration under those procedures.

As a result of this, where appropriate, the concerns raised may:

- be investigated by management or internal audit
- be investigated under the discipline/grievance/ anti-harassment process
- be referred to the external auditors
- be reported to the police
- Concerns or allegations which fall within the scope of other specific procedures, such as child protection or discrimination issues, will, normally be referred for consideration under those arrangements
- form the subject of an independent inquiry

Within ten working days of the concern being raised the employee will be written to:

- acknowledging that their concern has been received
- indicating how the Trust propose to deal with the issue

- telling them whether any further investigations will take place (and if not, explaining why this is the case)
- supplying them with information regarding support available

It is likely that the employee raising the concern will be spoken with, to ensure that their disclosure is fully understood. A meeting can be arranged away from the workplace, if they wish, and a Trade Union representative or a work colleague may accompany them in support.

The Trust will do all possible to minimise any difficulties that the person making the complaint 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.

The Trust recognises that matters raised under this policy may have an impact on an individual's wellbeing. Confidential support is available through the Schools Advisory Service (SAS) which provides access to counselling and support services. This support is available to any employee affected by a concern raised under this policy, including individuals who raise concerns and those who are the subject of them.

IF THE EMPLOYEE IS NOT SATISFIED

The Trust will always commit to dealing with any concerns in a fair and appropriate way. If the employee is unhappy with the way in which their concern has been handled, they can take the matter further as detailed below.

TAKING THE MATTER FURTHER/EXTERNAL DISCLOSURES

The aim of the policy is to provide employees with an appropriate way to raise their concerns, and it is hoped that in most cases this can be done internally. However, should the employee not be satisfied and/or they feel it necessary to take the matter outside the Trust, they are advised to seek legal advice. Our prescribed contacts are:

- the External Auditor:
[Sarah Flear, PKF Smith Cooper](#)
[Tel: 0115 945 4300](tel:01159454300)
Sarah.flear@pkf.co.uk
[2 Lace Market Square, Nottingham, NG1 1PB](#)
- the relevant Trade Union
- the Police

If the employee raises their concerns outside The White Hills Park Trust, they should ensure that it is only to one of the above or such person as may be prescribed by the secretary of state under Section 43 of the Public Interest Disclosure Act (PIDA) 1998.

The PIDA list has been expanded from June 2025 to include further offices where concerns can be reported including HM Treasury, for financial sanctions breaches. A public disclosure to

anyone else could take them outside the protection of the Public Interest Disclosure Act and of this policy.

They should not disclose information that is confidential to the Trust or to anyone else, except to those included in the list of prescribed contacts.

[Whistleblowing: list of prescribed people and bodies - GOV.UK](#)

SAFEGUARDS

The Legal Framework

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.

The Employment Rights Act section 47 B(1) provides specific protection against suffering a detriment, to workers making disclosures about wrongdoing/malpractice which are made in the public interest.

The Act makes it unlawful for an employer to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act.

Harassment or Victimisation

The White Hills Park Trust is committed to good practice and high standards and to being supportive of its employees.

The White Hills Park Trust 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 the Trust, their colleagues, and those for whom they are providing a service.

Employees are protected in law by the Public Interest Disclosure Act, 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. The White Hills Park Trust will not tolerate any harassment or victimisation (including any informal pressures) made towards another employee and will take the appropriate action as necessary under the Trust’s Disciplinary Policy, to protect employees when they raise a concern in the public interest.

Confidentiality

All concerns will be treated in confidence and any records relating to the case should be handled in accordance with the General Data Protection Regulations 2018. Every effort will be made not to reveal the identity of the employee who raises concerns, should that be their wish.

If the concerns raised are investigated as part of the disciplinary/grievance/harassment procedures, it may not be 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.

RECORD KEEPING

The Chief Executive Officer has overall responsibility for the maintenance and operation of this policy. A record of concerns raised will be maintained along with 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.

The Chief Executive Officer will report to the Trustees as necessary.

CONTACTS

Claire Shaw	Chief Executive Officer	claire.shaw@whptrust.org	0115 8243039
Sarah Flear	External Auditor	sarah.flear@pkf.co.uk	0115 9454300

Protect formerly *Public Concern at Work* (independent whistleblowing charity)

Advice line: (020) 3117 2520

E-mail: whistle@protect-advice.org.uk

Website: <https://protect-advice.org.uk>

(advice line hours Monday/Tuesday/Thursday: 9.30am – 1pm, 2pm – 5.30 pm)

Appendix 1 - Whistleblowing Reporting Form (Confidential)

Name (optional):

Role/Position (optional):

Date of Report:

Department/Area (if applicable):

1. Nature of Concern

Please describe the issue you are reporting and category of wrongdoing. Include details such as:

- What happened?
- When and where did it occur?
- Who was involved?

Insert text here

2. Please explain why you believe it is in the public interest to make this disclosure?

Insert text here

3. Is this concern ongoing?

- Yes
- No
- Not sure

4. Have you raised this concern before (internally)?

- Yes

Public interest – the wrongdoing goes beyond a personal employment dispute and affects others (colleagues, customers, the public) e.g. a pattern of harassment across teams, or organisational “cover up” creating an unsafe environment for multiple employees.

