



Twyford
C of E
Academies Trust

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| Document Title | Whistleblowing Policy |
| Committee Responsible for Policy | Resources Committee |
| Review Frequency | Every 3 years |
| Last Reviewed | October 2025 (updated May 2026) |
| Next Review Due | October 2028 |
| Policy Author | Director of Finance & Operations |

Assessment of the Impact of a Policy on Equality & Diversity

| Policy: Whistleblowing Policy | | | |
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| Impact assessed by: Richard Lane | | Date: 13 th October 2025 | |
| <p>1. What is the potential for this policy impacting a person or group with a protected characteristic differently (favourably or unfavourably) from everyone else?</p> <p>Staff with protected characteristics may receive less favourable treatment when they raise a concern under this policy.</p> | | | |
| <p>2. How would this be evidenced?</p> <p>By reviewing instances where the policy has been invoked.</p> | | | |
| <p>3. What is the impact of the policy and latest changes on people with protected characteristics?</p> | | | |
| Protected Characteristic | Impact before change* | Impact after change* | Comments |
| Age | Positive | Positive | |
| Disability | Positive | Positive | |
| Gender Reassignment | Positive | Positive | |
| Marriage and civil partnership | Positive | Positive | |
| Pregnancy and maternity | Positive | Positive | |
| Race | Positive | Positive | |
| Religion of belief | Positive | Positive | |
| Sex | Positive | Positive | |
| Sexual orientation | Positive | Positive | |

* Positive/Negative/Neutral

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| <p>4. Policies are required to reduce or eliminate inequality and disadvantage and promote diversity. Does this assessment indicate that the Policy and latest changes pass or fail this test?</p> <p style="text-align: center;">Pass</p> |
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Whistleblowing Policy

1 Introduction

Twyford C of E Academies Trust is committed to delivering high quality education and to that end expects high standards from its employees and contractors. In order to maintain those high standards a culture of openness and accountability is vitally important. The aims of this policy are threefold:-

- to encourage you to raise concerns about malpractice within the organisation without fear of reprisal;
- to reassure you that your concerns will be taken seriously;
- to provide information about how to raise your concerns and explain how the Trust will respond.

2 Scope of the Policy

This policy applies to all Twyford C of E Academies Trust employees, former employees, agency staff and contractors engaged by the Trust.

3 Blowing the Whistle on Malpractice

Malpractice covers a wide range of concerns. The types of activity that should be disclosed include but are not limited to the following:-

- fraud or corruption
- financial maladministration
- failure to comply with legal obligations
- endangering of an individual's health and safety
- sexual harassment
- damage to the environment
- a criminal offence
- failure to follow financial and contract procedure rules
- miscarriages of justice
- deliberate concealment of information relating to any of the above
- breach of school policy

In the event of a conflict between this policy and the Child Protection Policy or KCSIE concerning disclosure or any other matter then the Child Protection Policy or KCSIE prevails.

You should raise your concerns with your manager as soon as you suspect malpractice. You do not need to wait for proof of malpractice before raising it. Remember that you (the whistleblower) are a witness to events and not a complainant.

When reporting a concern you should provide as much information and detail as possible, for example, full names, dates of events and any relevant documentation. This will help the investigator to focus the investigation on the main issues quickly.

There will be some cases where it is not appropriate for you to raise concerns with your manager, for example where you suspect your manager already knows about the malpractice and appears to be 'turning a blind eye', or where you suspect your manager may be involved. In those cases, you should report your concerns to the appropriate Line Manager or Senior Manager.

Initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. You will be advised whether an investigation takes place or not. Depending upon the nature of the matter raised, we may not be able to give you very much information or give you details of the action taken. When making a decision the Chief Executive and Chair of the Board of Directors will consider whether continuing with an investigation is in the public interest.

4 Confidentiality

The Trust understands that you may be reluctant to come forward with information about the wrongdoing of a colleague or manager or indeed at all. As such, the Trust recognises that whistleblowers may wish to raise concerns in confidence. If you (the whistleblower) make a request for the matter to be kept confidential then your identity will not be revealed without discussing the matter with you first.

5 Anonymous Allegations

You are encouraged to give your name when raising concerns. Anonymous allegations are more difficult to investigate. The decision whether to investigate an anonymous allegation will be made by the Chief Executive in consultation with the Chair of the Board of Directors.

6 Protection for the Whistleblower

All concerns raised under this procedure will be treated seriously and a decision made about whether or not an investigation is appropriate. Depending upon the nature of the matter it may be referred to the LDBS, LEA or the police. You will be kept informed about the progress of the investigation and the action which has been taken although you may not be told the outcome. In some cases the investigation may result in criminal or disciplinary proceedings. If this happens you may be invited to give a written statement or give evidence at a hearing. The Trust will support you in this process and ensure that you are clear about what will happen.

The Trust will not tolerate harassment or victimisation and will take action to protect you if you have raised a concern in good faith. Any employee who is found to have victimised or harassed an employee who has raised a concern will face disciplinary action.

7 Allegations not made in Good Faith

Concerns that are raised frivolously, maliciously, for personal gain or where they are known to be untrue may result in disciplinary action or, in the case of agency staff, the termination of the agency contract. In the case of contractors, the matter will be

reported to the Chief Executive or the Director of Finance & Operations so that a decision can be made about the appropriate action to take.

8 Advice and Support

The Trust recognises that employees may wish to seek advice and support from their trade union before blowing the whistle. Alternatively, employees may wish to seek advice from 'Protect, an independent organization which is entirely separate from the Trust. Protect have lawyers who provide confidential advice, free of charge, to people concerned about wrongdoing at work. Their details are on their website, <https://protect-advice.org.uk> and they can be contacted by telephone on 020 3117 2520.

9 Blowing the Whistle Outside Twyford C of E Academies Trust

In certain circumstances it may be appropriate to raise concerns outside the Trust to the appropriate 'prescribed regulator'. This should only be done where you are raising a genuine concern in good faith and where you believe that the information being passed on is substantially true, i.e. more than just suspicion. You are advised to discuss your concerns with a legal advisor, union or Protect before reporting them outside the Trust.

10 Complaints and Grievances

This policy should not be confused with other policies that exist for dealing with complaints or grievances. For example, complaints about the quality of service delivery should be addressed through the Trust's complaints procedure. Employees who are aggrieved about their own employment situation should probably use the grievance procedure.

11 Review of this Policy

The Board of Directors has overall responsibility for the operation of this policy and will review it every three years to ensure its continuing relevance and in response to changes in the law.