

Whistleblowing (Speak Up) Policy 2026

Document type	Trust Policy	Statutory DfE / Trust	DfE / Trust
Approval Level	Trust Board of Directors	Review Frequency	Annual
Approval date	01 October 2026	Next Review Date	30 September 2028
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Publication to	☒ GovHub	☒ Staff info site	☒ Website

Trust Vision Statement

“The kingdom of heaven is like a mustard seed, which a man took and planted in his field. Though it is the smallest of all seeds, yet when it grows, it is the largest of garden plants and becomes a tree, so that the birds come and perch in its branches.” (Matthew 13: 31-32)

Trust Vision

In the parable of The Mustard Seed, Jesus reminds us that even the smallest of seeds has the potential to grow into the fullness of itself. We aim to provide the right environment for our children, and all whom we serve, to flourish into the fullness of themselves. He tells us these seeds grow into trees, capable of providing a home for a rich diversity of life; our work is to ensure all in our communities grow into people of compassion and wisdom with a deep spiritual understanding of how to support the needs of others.

Table of Contents

Whistleblowing (Speak Up) Policy 2026	1
Table of Contents	1
1 Introduction	2
2 Purpose	3
3 Scope	3

4	What is Whistleblowing?.....	4
5	Matters not covered by this policy.....	4
6	Safeguarding concerns	5
7	Protection for Individuals Raising Concerns.....	5
8	Confidentiality	6
9	Anonymous Concerns.....	6
10	How to raise a concern.....	6
10.1	Normal reporting route.....	6
10.2	Alternative specialist routes.....	7
10.3	Bypassing a stage	7
10.4	Further escalation	7
10.5	Form of disclosure.....	7
11	Concerns involving Senior Leaders.....	7
12	Investigation Process.....	8
13	Malicious or Deliberately False Allegations.....	9
14	External Reporting.....	9
15	Independent Advice.....	10
16	Record Keeping.....	10
17	Monitoring and Oversight	10
18	Related policies.....	11

1 Introduction

LDBS Academies Trust and LDBS Academies Trust 2 ("the Trust") are committed to the highest standards of integrity, openness, accountability and stewardship.

The Trust encourages employees, workers, agency staff, contractors, consultants, volunteers, local governors, directors and others working with or for the Trust to raise concerns where they reasonably believe that wrongdoing, malpractice or risks to others have occurred, are occurring or are likely to occur.

The Trust is committed to creating a culture in which concerns can be raised safely, promptly and without fear of victimisation, disadvantage or retaliation.

The Trust will take all concerns raised under this policy seriously and investigate them appropriately, proportionately and objectively.

This policy has been prepared with regard to the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998. The legislation protects eligible workers from detriment, and employees from

unfair dismissal, where they make a protected disclosure in accordance with the law. Whether a disclosure attracts statutory protection will depend on the circumstances and the legal requirements being met.

2 Purpose

The aims of this policy are to:

- encourage the raising of concerns at the earliest opportunity;
- provide clear routes for reporting concerns;
- ensure concerns are investigated fairly and appropriately;
- protect individuals who raise concerns with a reasonable belief;
- support compliance with legal, regulatory and safeguarding requirements;
- promote a culture of openness and accountability throughout the Trust.

3 Scope

This policy applies to:

- employees;
- workers;
- agency staff;
- casual staff;
- contractors and consultants;
- volunteers;
- local governors;
- Trust directors;
- members;
- individuals undertaking work experience or training placements.

This policy applies to concerns about the activities of:

- the Trust;
- any Trust school;
- the central Trust team;
- directors;
- governors;
- employees;
- contractors;
- volunteers;
- any person acting on behalf of the Trust.

The Trust will consider concerns raised by anyone within the scope of this policy. However, statutory whistleblowing protection applies to categories of worker defined by law and does not necessarily apply in the same way to every person listed above. Individuals who are uncertain about their legal position may seek independent advice.

4 What is Whistleblowing?

Whistleblowing is the reporting of information that the person raising the concern reasonably believes shows wrongdoing or a risk of wrongdoing and is in the public interest.

Concerns may relate to:

- criminal offences;
- fraud, theft or financial irregularity;
- bribery or corruption;
- misuse of public funds;
- failure to comply with a legal obligation;
- breach of statutory guidance;
- breaches of the Academy Trust Handbook;
- serious breaches of Trust policies;
- safeguarding failures;
- risks to the welfare of children;
- health and safety risks;
- miscarriage of justice
- damage to the environment;
- abuse of authority or position;
- serious misconduct;
- sexual harassment
- deliberate concealment of any of the above.

The Trust particularly encourages the reporting of any concern relating to:

- safeguarding;
- child protection;
- financial management;
- procurement;
- conflicts of interest;
- governance;
- fraud;
- data protection breaches;
- unethical conduct.

Government guidance confirms that whistleblowing disclosures may relate to matters such as criminal offences, legal breaches, health and safety dangers, environmental damage, sexual harassment and deliberate concealment of wrongdoing.

5 Matters not covered by this policy

This policy is not normally intended for complaints concerning an individual's personal employment situation.

Examples include:

- pay;
- promotion;
- working conditions;
- relationships with colleagues;
- management decisions affecting an individual.

Such matters should ordinarily be raised through:

- the Grievance Procedure;
- other relevant employment procedures.

However, where a matter also raises wider concerns about wrongdoing, illegality, safeguarding, public money or governance, it may fall within this policy.

6 Safeguarding concerns

Safeguarding concerns must always be acted upon immediately.

Nothing in this policy should delay:

- reporting concerns to the Designated Safeguarding Lead;
- contacting Children's Social Care;
- contacting the Local Authority Designated Officer (LADO);
- contacting the police where appropriate.

Where a concern involves immediate risk of harm to a child, staff should follow safeguarding procedures without delay.

The Trust's safeguarding policies operate alongside this policy.

7 Protection for Individuals Raising Concerns

The Trust will not tolerate retaliation against anyone who raises a concern honestly and on the basis of a reasonable belief that the information tends to show wrongdoing. This is a commitment made by the Trust and applies whether or not the person raising the concern qualifies for statutory whistleblowing protection.

Examples of unacceptable retaliation include:

- dismissal;
- disciplinary action;
- threats;
- harassment;
- discrimination;
- victimisation;
- denial of opportunities;
- any other detriment arising from the disclosure.

Any person responsible for retaliatory behaviour may face disciplinary action.

An individual will not face action simply because a concern raised honestly and on the basis of a reasonable belief is not subsequently substantiated.

8 Confidentiality

The Trust will treat concerns confidentially so far as reasonably practicable.

The identity of a whistleblower will not normally be disclosed without consent unless:

- required by law;
- required by a regulatory investigation;
- required to ensure a fair investigation;
- required to safeguard children or others.

Individuals should understand that complete confidentiality cannot always be guaranteed.

9 Anonymous Concerns

Anonymous concerns may be raised.

The Trust will consider anonymous concerns where sufficient information is provided.

However, anonymous reporting can make investigation more difficult and may limit the feedback that can be provided.

Individuals are encouraged to identify themselves wherever possible.

10 How to raise a concern

10.1 Normal reporting route

Where appropriate, a concern should initially be raised with the individual's line manager.

If the concern:

- cannot appropriately be raised with the line manager;
- involves the line manager;
- is not addressed appropriately; or
- remains unresolved,

it should be escalated as follows:

- Headteacher;
- CEO or COO;
- Chair of the Audit and Risk Committee or Chair of the Trust Board, depending on the nature of the concern;
- an appropriate external body or prescribed person.

10.2 Alternative specialist routes

A concern relating primarily to suspected fraud, financial irregularity, procurement, misuse of funds, accounting or weaknesses in financial controls may be raised with the Finance Manager, COO or Chair of the Audit and Risk Committee, provided that the recipient is sufficiently independent of the matter.

A safeguarding concern must be raised immediately through the routes set out in section 6.

10.3 Bypassing a stage

The person raising the concern is not required to follow every stage in sequence. A concern may be raised directly with a more senior or independent recipient where:

- the concern involves someone at an earlier stage;
- there is an actual or perceived conflict of interest;
- the concern is particularly serious;
- the person reasonably believes that evidence may be concealed or destroyed;
- an earlier report has not been addressed appropriately;
- the person reasonably fears retaliation.

10.4 Further escalation

Where a whistleblower reasonably believes that the concern has not been considered or addressed appropriately, the matter may be escalated to the Chair of the Audit and Risk Committee or the Chair of the Trust Board.

Where the concern involves either Chair, it should be referred to the other Chair or, where appropriate, to the Vice-Chair of the Trust Board.

10.5 Form of disclosure

Concerns may be raised verbally or in writing. Where raised verbally, the recipient should make a written record and invite the whistleblower to confirm that it is accurate.

11 Concerns involving Senior Leaders

Concern relates to	Appropriate internal recipient
Headteacher	Chair of Local Governing Body or CEO
Chair of the Local Governing Body	CEO or Chair of the Trust Board
Other local governor	Chair of Local Governing Body or CEO
Finance Manager	COO or Chair of the Audit and Risk Committee

COO	CEO or Chair of Trust Board
CEO	Chair of Trust Board
Trust Director	Chair of Trust Board
Chair of the Audit and Risk Committee	Chair of Trust Board
Chair of Trust Board	Vice Chair of the Trust Board
Concern involving more than one executive leaders or Trust Director	Chair of Audit and Risk Committee or Chair of Trust Board, selecting whichever is independent of the matter
Suspected financial wrongdoing	Finance Manager, COO or Chair of Audit and Risk Committee, provided that the recipient is independent of the matter

12 Investigation Process

Upon receipt of a concern the Trust will:

- assess the concern;
- determine whether it falls under this policy;
- determine whether immediate safeguarding, legal or regulatory action is required;
- appoint an appropriate investigator where necessary;
- conduct a proportionate investigation;
- determine any required actions.

Investigations may involve:

- interviews;
- document review;
- financial review;
- safeguarding enquiries;
- external specialist advice.

The Trust may involve:

- auditors;
- legal advisers;
- HR advisers;
- Children's Social Care;
- the police;
- the Education and Skills Funding Agency;
- the Department for Education;
- other regulators.

The recipient will acknowledge the concern, where contact details have been provided, and will arrange for an initial assessment by someone who is sufficiently independent of the matter.

The Trust will decide whether the concern should be investigated under this policy, referred to another procedure, reported to an external body, or addressed through another appropriate course of action. The decision and reasons will be recorded.

Where a meeting is held, the whistleblower may be accompanied by a workplace colleague or trade union representative, provided that this does not compromise confidentiality.

The investigator will be given appropriate authority, access to relevant records and sufficient independence from the matters under investigation.

The whistleblower will be informed when consideration of the concern has concluded, where possible. The Trust may be unable to disclose detailed outcomes because of confidentiality, safeguarding, data-protection or employment-law obligations.

Subject to legal, safeguarding, data-protection and employment-law considerations, the Trust will seek to provide appropriate feedback to the person who raised the concern. The Trust may be unable to provide details of disciplinary outcomes, personal employment information or confidential safeguarding information.

13 Malicious or Deliberately False Allegations

The Trust recognises the difference between:

- a concern raised with a reasonable belief which is not upheld;
- a genuine mistake;
- a deliberately false or malicious allegation.

No action will be taken against an individual who raises a concern honestly and with a reasonable belief.

However, where an allegation is found to have been deliberately fabricated or made maliciously, disciplinary or other appropriate action may be taken.

14 External Reporting

The Trust encourages concerns to be raised internally wherever possible. The conditions for statutory protection vary depending on the recipient and the circumstances. A person considering external disclosure is encouraged to seek independent advice.

However, individuals have the right to raise concerns externally where appropriate.

Examples may include:

- the Department for Education;
- the Charity Commission;
- the Health and Safety Executive;
- the Information Commissioner's Office;
- the police;
- local authority safeguarding services;
- other prescribed persons or regulators.

- the NSPCC, for child-welfare or child-protection concerns;

A disclosure about an academy or academy trust may be made to the Department for Education through its [Customer Help Portal](#). The Department currently allows anonymous disclosures to be submitted using the guest option.

The Government maintains and updates a list of prescribed persons and bodies. A person considering external disclosure should ensure that the selected organisation is prescribed for the subject matter concerned and may wish to obtain independent advice first.

15 Independent Advice

Free and independent whistleblowing advice may be obtained from:

Protect - The UK's independent whistleblowing charity.

<https://protect-advice.org.uk/> or tel: **020 3117 2520**.

Concerns about the handling of child-protection matters may also be discussed with the NSPCC Whistleblowing Advice Line on 0800 028 0285.

16 Record Keeping

A central and confidential register of concerns raised under this policy will be maintained on behalf of the Trust. Access will be restricted to those who require it for the management, oversight or assurance of whistleblowing arrangements. Where the normal record holder is involved in a concern, an alternative record holder will be appointed.

The Trust will maintain secure records of:

- concerns raised;
- investigations undertaken;
- decisions reached;
- actions taken;
- lessons learned.

Records will be managed in accordance with:

- data protection legislation;
- the Trust's Records Retention Schedule;
- safeguarding requirements where applicable.

17 Monitoring and Oversight

The Audit and Risk Committee will receive an anonymised report at least annually and may receive more frequent reports where the number, seriousness or pattern of concerns warrants this.

The Chair of the Trust Board and Chair of the Audit and Risk Committee will be notified promptly of any disclosure that raises a significant risk to safeguarding, public funds, legal compliance, governance, the

Trust's reputation or the continued effective operation of the Trust, subject to the need to preserve confidentiality and investigative integrity.

Reports will preserve confidentiality and anonymity.

The Committee will use this information to gain assurance regarding:

- governance;
- internal controls;
- safeguarding culture;
- financial management;
- organisational integrity.

18 Related policies

This policy should be read alongside:

- Child Protection and Safeguarding Policy;
- Staff Professionalism and Code of Conduct;
- Grievance Procedure;
- Disciplinary Procedure;
- Fraud Response Plan;
- Anti-Bribery Policy;
- Financial Regulations;
- Data Protection Policy;
- Complaints Policy.