SOUTH DOWNS
LEARNING TRUST

CONFIDENTIAL REPORTING (WHISTLEBLOWING) POLICY

Date approved by Governors	May 2025
Date of next Review	May 2026
Status	Statutory
Lead Author	Executive Headteacher

OUR VISION

A community of primary and secondary academies that are the first choice for students and families in Sussex, with an outstanding reputation for high aspiration and high achievement

1. Purpose

1.1 To set out the South Downs Learning Trust ('the Trust') policy and procedure for dealing with concerns raised by employees, ensuring clarity, transparency, and protection for whistleblowers.

2. Background

2.1 The Trust recognises that employees are often the first to identify potential issues, and it is essential that they feel empowered to raise concerns without fear of harassment or victimisation. In line with the Public Interest Disclosure Act 1998, which provides legal protection for employees making disclosures in the public interest, this policy reinforces the Trust's commitment to integrity, accountability, and a safe environment for employees to voice concerns. The policy will be regularly reviewed to ensure compliance with updated safeguarding and employment legislation, along with any changes in legal requirements, with the Executive Headteacher ensuring it remains legally effective and up to date.

2.2 The Trust upholds the highest standards of operation, probity, and accountability. Employees and stakeholders with serious concerns about the Trust or its Academies are encouraged to report them. This policy ensures that employees can do so without fear of reprisal, enabling concerns to be addressed internally rather than being ignored or raised externally inappropriately. Confidentiality will be maintained where possible.

3. Aims and Scope of the Policy

3.1 This policy aims to: • Provide clear avenues for employees to raise concerns internally and receive feedback on any actions taken; • Ensure that concerns are addressed promptly, fairly, and effectively; • Reassure employees that they will be protected from victimisation for whistleblowing in good faith; • Outline escalation routes if employees are dissatisfied with the Trust's response.

3.2 This policy provides a mechanism for employees to report concerns related to improper or unlawful practices within the Trust. Certain concerns may be more appropriately handled under different procedures (e.g., anti-fraud, grievance, disciplinary, safeguarding, or harassment policies).

3.3 Issues falling under this policy may include: • Unlawful activity or regulatory breaches; • Violations of Trust policies or procedures; • Conduct below expected standards of professional practice; • Financial malpractice or corruption; • Risks to health and safety; • Misuse of Trust resources; • Failure to comply with legal obligations.

3.4 Before initiating a formal whistleblowing procedure, employees should consider discussing concerns informally with their line manager or raising them in team meetings, where appropriate.

3.5 Employees have the right to report concerns about the actions of any employee, contractor, governor, or volunteer.

3.6 Concerns regarding an employee's own employment conditions should be raised through the Trust's Grievance Procedure.

4. Safeguards

4.1 Protection from Harassment or Victimisation

4.1.1 The Trust recognises that raising concerns can be difficult, particularly if the concern relates to a colleague or senior staff member. The Trust will not tolerate any form of harassment or victimisation against whistleblowers and will take appropriate action against those responsible.

4.1.2 Raising a concern under this policy does not exempt an employee from any legitimate internal procedures, such as performance management or disciplinary processes, where applicable.

4.2 Confidentiality

4.2.1. The Trust will respect an employee's request for confidentiality wherever possible. However, there may be instances where maintaining anonymity is not feasible, particularly if formal legal proceedings are required. In such cases, the employee will be consulted before disclosure.

4.3 Anonymous Allegations

4.3.1 Anonymous allegations will be assessed at the discretion of the Headteacher of each school, considering factors such as the seriousness of the concern, the credibility of the information provided, the availability of supporting evidence, and the likelihood of corroborating the allegations from other sources. This approach ensures a consistent and fair process for handling anonymous disclosures.

4.4 Untrue or Malicious Allegations

4.4.1 Employees will not be penalised for raising concerns in good faith, even if their concerns are later found to be unsubstantiated. However, if an allegation is proven to be malicious or knowingly false, disciplinary action may be taken.

4.5 Support for Employees

4.5.1 The Trust recognises that whistleblowing can be a stressful experience and is committed to providing appropriate support to employees throughout the process. Initially, this support will come from a neutral colleague, agreed upon through discussion with the employee.

5 How to raise a Concern

5.1 Employees should first raise concerns with their immediate manager. If the concern involves the manager or is of a serious nature, it should be directed to the Headteacher or Executive Headteacher. Concerns related to safeguarding must be reported to the Local Authority Designated Officer (LADO).

5.2 Employees should submit concerns in writing where possible, detailing relevant background information, dates, locations, and involved individuals. If an employee is unable to submit concerns in writing, they may raise them in person or via telephone.

5.3 Employees should raise concerns as early as possible to facilitate timely intervention.

5.4 Employees do not need to provide proof but should present sufficient grounds for concern.

5.5 Employees may seek advice from their trade union or professional association when raising concerns.

6 Investigating and Addressing Concerns

6.1 When a concern is raised, the recipient must: • Acknowledge receipt within five working days; • Conduct an initial assessment to determine the appropriate action; • Maintain a clear and confidential record of all discussions and actions taken; • Explain the process, confidentiality measures, and potential outcomes to the whistleblower.

6.2 Investigation Process

6.2.1 The Trust will conduct a prompt, fair, and impartial investigation. This may involve: • Internal inquiries led by senior leaders; • Referral to an external regulatory body; • A disciplinary process, if applicable.

6.2.2 Where necessary, an independent investigator may be appointed to ensure objectivity.

6.2.3 If the concern was raised anonymously, an assessment will determine the feasibility of further action based on available evidence.

6.3 Communication with the Whistleblower

6.3.1 The whistleblower will be informed of: • The Trust's response and any actions taken; • The outcome of the investigation where appropriate; • Any further steps they can take if dissatisfied with the resolution.

6.3.2 If a whistleblower is dissatisfied with the Trust's response, they may escalate their concern externally to: • The Education and Skills Funding Agency (ESFA); • The Department for Education; • A relevant regulatory body, such as Ofsted.

6.4 Concluding the Process

6.4.1 Once the investigation is complete, a formal record of the concern and any actions taken will be maintained. The Trust will use findings from whistleblowing reports to improve practices and mitigate future risks.