



Whistleblowing Policy

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Document Control

Review Frequency	3 Years
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Lead/Owner	HR
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The electronic version is the definitive version of this document.

The content of this procedure may be subject to revision from time to time in line with the policy review schedule or when legislation changes or operational reasons arise. Consultation with the recognised trade unions will be completed before any changes are made.

Version Changes

Version	Page Number	Details of Change	Agreed By	Date
3	Throughout	Changes to scheme of delegation	SELT	September 2018
5	Throughout	Amending dates for review	SELT	May 2021
6.1	Throughout	Hyperlinks updated and amending dates for review	SELT	May 2025
7	Throughout	Change to new policy format to align with other HR Policies and update external links	SELT / JCC	02/03/2026



Version	Page Number	Details of Change	Agreed By	Date
7	5	Update vision and values to align with other HR policies	SELT / JCC	02/03/2026
7	6	3.2- Additional line added "This policy also reflects amendments introduced by the Employment Rights Act 2025, including provisions relating to sexual harassment as a qualifying disclosure"	SELT / JCC	02/03/2026
7	6	4.1- Additional line added "However, a disclosure may still be in the public interest even where it affects the individual raising the concern, particularly where it indicates systemic failure, safeguarding risk or unlawful conduct"	SELT / JCC	02/03/2026
7	6 & 7	4.17, 4.1.8, and 4.1.9 added to cover the changes in Employment Law from April 2026	SELT / JCC	02/03/2026
7	7	4.3- Reworded to "Concerns relating to bullying or harassment may, depending on the circumstances, amount to a protected disclosure under whistleblowing legislation, particularly where they raise wider issues of legal compliance, safeguarding, systemic failure or risk to others"	SELT / JCC	02/03/2026
7	8	6.1.3- Reworded to "Reiterate, at this meeting, that no worker will suffer dismissal, disciplinary action, detriment, disadvantage or victimisation for raising a protected disclosure. If the concern is found to be malicious or vexatious, disciplinary action may be taken (see section 6 of this policy)"	SELT / JCC	02/03/2026
7	10	Section 10- Links to policies added, 10.1.1.3 policy name updated and Staff Anti Bullying and Harassment Policy added to links to other policies.	SELT / JCC	02/03/2026



1. Vision and Values

- 1.1.** Plymouth CAST is a multi-academy trust of Catholic schools which is part of the mission of the Catholic Church dedicated to human flourishing and the building of a kingdom of peace, truth and justice. The Trust is to be conducted in all aspects in accordance with canon law and the teachings of the Roman Catholic Church and at all times to serve as a witness to the Catholic faith in Our Lord Jesus Christ.
- 1.2.** Our vision and values are derived from our identity as a Catholic Trust. Central to our vision is the dignity of the human person, especially the most vulnerable. Our academies are dedicated to providing an education and formation where all our pupils and young people flourish in a safe, nurturing, enriching environment. All governors in our academies are expected to be familiar with the vision, mission, values and principles of the Trust and not in any way to undermine them. They should support and promote the vision and conduct themselves at all times in school and on school business according to the vision and principles of the Trust.
- 1.3.** Plymouth CAST expects all its employees to recognise their obligations to each school within the Multi-Academy Trust, the public, pupils and other employees and to provide consistently high standards of education and performance at all times and in accordance with Plymouth CAST's vision, mission and principles.

2. Aims

- 2.1.** This policy aims to:
 - 2.1.1.** Encourage individuals affected to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated and that their confidentiality will be respected.
 - 2.1.2.** Let all staff in the trust know how to raise concerns about potential wrongdoing in or by the Trust.
 - 2.1.3.** Set clear procedures for how the trust will respond to such concerns.
 - 2.1.4.** Let all staff know the protection available to them if they raise a whistleblowing concern.
 - 2.1.5.** Assure staff that they will not be victimised for raising a legitimate concern through the steps set out in the policy even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue).
- 2.2.** This policy does not form part of any employee's contract of employment and may



be amended at any time. The policy applies to all employees or other workers who provide services to the trust in any capacity including self-employed consultants or contractors who provide services on a personal basis and agency workers.

3. Legislation

- 3.1.** The requirement to have clear whistleblowing procedures in place is set out in the current Academy Trust Handbook.
- 3.2.** This policy has been written in line with the above document, as well as government guidance on whistle-blowing <https://www.gov.uk/whistleblowing>. This policy also reflects amendments introduced by the Employment Rights Act 2025, including provisions relating to sexual harassment as a qualifying disclosure.
- 3.3.** This policy complies with our funding agreement and articles of association.

4. Definition of Whistleblowing

4.1. Whistleblowing covers concerns made that report wrongdoing that is “in the public interest”. However, a disclosure may still be in the public interest even where it affects the individual raising the concern, particularly where it indicates systemic failure, safeguarding risk or unlawful conduct. Examples of whistleblowing include (but aren’t limited to):

- 4.1.1.** Criminal offences, such as fraud or corruption
- 4.1.2.** Pupils’ or staffs’ health and safety being put in danger
- 4.1.3.** Failure to comply with a legal obligation or statutory requirement
- 4.1.4.** Breaches of financial management procedures
- 4.1.5.** Attempts to cover up the above, or any other wrongdoing in the public interest
- 4.1.6.** Damage to the environment
- 4.1.7.** Sexual harassment or serious breaches of equality law

Clarification on sexual harassment concerns

Concerns relating to sexual harassment may be raised under either the Whistleblowing Policy or the Grievance Policy, depending on the nature of the concern:



- **Whistleblowing:** where the concern is in the public interest, for example where there is a systemic issue, failure to act, safeguarding risk, repeated behaviour affecting multiple individuals, or a failure to comply with legal obligations.
- **Grievance:** where the concern relates primarily to an individual's personal experience or treatment, and does not indicate a wider risk or systemic failing.

Staff are encouraged to seek advice if unsure which route is most appropriate.

- 4.1.8.** A failure to take appropriate steps to prevent sexual harassment
- 4.1.9.** Attempts to conceal such conduct
- 4.2.** A whistle-blower is a person who raises a genuine concern relating to the above.
- 4.3.** Concerns relating to bullying or harassment may, depending on the circumstances, amount to a protected disclosure under whistleblowing legislation, particularly where they raise wider issues of legal compliance, safeguarding, systemic failure or risk to others.
- 4.4.** When staff have a concern, they should consider whether it would be better to follow our staff grievance or complaints procedures.
- 4.5.** Protect (formerly Public Concern at Work) has:
 - 4.5.1.** Further guidance on the difference between a whistleblowing concern and a grievance that staff may find useful if unsure.
<https://protect-advice.org.uk/what-is-whistleblowing/>
 - 4.5.2.** A free and confidential advice line - 020 3117 2520

5. Procedure for staff to raise a Whistleblowing concern

5.1. When to raise a concern

Staff should consider the examples in section 3 when deciding whether their concern is of a whistleblowing nature. Consider whether the incident(s) was illegal, breached statutory or trust procedures, put people in danger or was an attempt to cover any such activity up.

5.2. Who to report to

Staff should report their concern to the Clerk to the Trust Board of Directors. If



the concern is about the Clerk to the Board or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the Vice Chair of the Board of Directors (with a responsibility for whistleblowing).

5.3. How to raise the concern

Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter.

6. Trust procedure for responding to a whistleblowing concern

6.1. Investigating the concern

When a concern is received by the Clerk to the Board - referred to from here as the 'recipient' – they, or where considered appropriate the HR Manager will:

- 6.1.1.** Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative.
- 6.1.2.** Get as much detail as possible about the concern at this meeting and record the information. If it becomes apparent the concern is not of a whistleblowing nature, the recipient should handle the concern in line with the appropriate policy/procedure.
- 6.1.3.** Reiterate, at this meeting, that no worker will suffer dismissal, disciplinary action, detriment, disadvantage or victimisation for raising a protected disclosure. If the concern is found to be malicious or vexatious, disciplinary action may be taken (see section 6 of this policy).
- 6.1.4.** Establish whether there is sufficient cause for concern to warrant further investigation. If there is:
 - 6.1.4.1.** The recipient should then arrange a further investigation into the matter, involving the named Director, if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In other cases, they may need to report the matter to the police.
 - 6.1.4.2.** The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps.



6.2. Outcome of the investigation

- 6.2.1.** Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether a referral is required to an external organisation, such as the local authority or police.
- 6.2.2.** They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.
- 6.2.3.** Beyond the immediate actions, the headteacher, directors and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.
- 6.2.4.** Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

7. Malicious or vexatious allegations

- 7.1.1.** Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern.
- 7.1.2.** If, however, an allegation is shown to be deliberately invented or malicious, the trust will consider whether any disciplinary action is appropriate against the person making the allegation.

8. Escalating concerns beyond the Trust

- 8.1.1.** The trust encourages staff to raise their concerns internally, in line with section 4 of this policy, but recognises that staff may feel the need to report concerns to an external body. A list of prescribed bodies to whom staff can raise concerns with is included within this link <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-peo>



[ple-and-bodies#education](#).





- 8.1.2.** The Protect advice line, linked to in section 3 of this policy, can also help staff when deciding whether to raise the concern to an external party.

9. Approval

- 9.1.1.** This policy will be reviewed every 3 years unless there is updated guidance from the DFE/ESFA These procedures have been agreed by the Board of Directors, who will approve them whenever reviewed.

10. Links with other policies

- 10.1.1.** This policy links with our policies on:

- 10.1.1.1. Grievance Policy  Grievance
- 10.1.1.2. Complaints Policy and Procedure  CAST Complaints Policy
- 10.1.1.3. Safeguarding Policy  SAFEGUARDING POLICIES & PROCEDURES
- 10.1.1.4. Staff Anti Bullying and Harassment Policy
 Staff Anti Bullying and Harassment





Our mission is to be a community of outstanding schools in which our pupils flourish in safe, happy and stimulating environments and leave us with the knowledge and skills, personal qualities and aspirations, to make the world a better place, inspired by the gospel.

Plymouth CAST



Collaboration

We are one team, being the best we can be. We achieve more altogether - one Trust, one family of schools, one community.

We are united through our faith, families and staff.



Ambition

We want our children to be happy and to flourish, achieving well.

Across all areas, we work as one team to drive up standards. We are courageous in our decision making and aspirations.

Through the strength of our ambition, we create a distinct brand and culture.



Stewardship

Justice, forgiveness and integrity are central to the gospels and drive our decision-making. Underpinning this is a relentless approach to safety, reliability and consistency.

As key influencers of our children's impact on society and the environment, we encourage sustainable and brave decision-making, based on a beliefs-led approach.



Trust

We are authentic, transparent, open and honest.

Through compassion and kindness, we show humility to each other.