



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
7.1	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
7.1	5	Update vision and values to align with other HR policies	SELT / JCC	02/03/2026
7.1	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
7.1	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
7.1	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
7.1	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
7.1	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
7.1	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
8	8	2.1.6 Added wording; "The Trust will not tolerate retaliation, victimisation, intimidation, bullying, exclusion, adverse treatment or disadvantage against any person who raises a whistleblowing concern or participates in an investigation".	Board	17/07/2026
8	8	3.1- References to laws and regulations added and corrected in 3.2.	Board	17/07/2026
8	8	4.1- Wording added; "Where concerns relate to safeguarding, child protection, abuse, neglect, extremist risk or conduct posing a risk to children,	Board	17/07/2026



Version	Page Number	Details of Change	Agreed By	Date
		the Trust will act in accordance with statutory safeguarding guidance including Keeping Children Safe in Education”		
8	9	4.3- New clause added “Concerns may be raised anonymously. Anonymous disclosures will be considered seriously, although investigation may be more limited where insufficient information is available”	Board	17/07/2026
8	9	4.4- New clause added “Concerns relating to allegations against adults working with children may also be managed under safeguarding and allegations management procedures, including referral to the Local Authority Designated Officer (LADO) where appropriate”	Board	17/07/2026
8	9	4.5- New clause added “The Trust will seek to protect confidentiality wherever possible. However, confidentiality cannot always be guaranteed where disclosure is required by law, safeguarding obligations, regulatory requirements or fair investigation processes”	Board	17/07/2026
8	10	5.2- Wording added “Current whistleblowing contacts, including the Vice Chair responsible for whistleblowing, are published on the Trust website https://www.plymouthcast.org.uk/board_of_directors and available from HR upon request”	Board	17/07/2026
8	11	6.1.1 timescales have been added to ensure concerns are raised efficiently. The right to representation has also been added.	Board	17/07/2026
8	11	6.1.5 and 6.1.6 added to provide details on where support can be obtained and updates during the process.	Board	17/07/2026
8	12	Section 7 changed to ensure individuals feel protected in making a disclosure.	Board	17/07/2026
8	13	Section 10 approval has been removed as this is covered on page 3 and replaced with a data protection and confidentiality statement	Board	17/07/2026
8	13	Section 12, further links to policies have been added.	Board	17/07/2026



Version	Page Number	Details of Change	Agreed By	Date
8	14	Wording added to explain the contents for anyone using a screen reader (such as the visually impaired).	Board	17/07/2026

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, nursery and educational setting 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).

- 2.1.6.** The Trust will not tolerate retaliation, victimisation, intimidation, bullying, exclusion, adverse treatment or disadvantage against any person who raises a whistleblowing concern or participates in an investigation.
- 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. This policy is intended to comply with the Public Interest Disclosure Act 1998, Part IVA of the Employment Rights Act 1996, the Equality Act 2010, the Worker Protection (Amendment of Equality Act 2010) Act 2023, the Academy Trust Handbook, Keeping Children Safe in Education, UK GDPR and the Data Protection Act 2018.
- 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 Worker Protection (Amendment of Equality Act 2010) Act 2023, 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. Where concerns relate to safeguarding, child protection, abuse, neglect, extremist risk or conduct posing a risk to children, the Trust will act in accordance with statutory safeguarding guidance including Keeping Children Safe in Education. 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 may be raised anonymously. Anonymous disclosures will be considered seriously, although investigation may be more limited where insufficient information is available.
- 4.4. Concerns relating to allegations against adults working with children may also be managed under safeguarding and allegations management procedures, including referral to the Local Authority Designated Officer (LADO) where appropriate.
- 4.5. The Trust will seek to protect confidentiality wherever possible. However, confidentiality cannot always be guaranteed where disclosure is required by law, safeguarding obligations, regulatory requirements or fair investigation processes.
- 4.6. 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.

- 4.7. When staff have a concern, they should consider whether it would be better to follow our staff grievance or complaints procedures.
- 4.8. Protect (formerly Public Concern at Work) has:
 - 4.8.1. 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/>
 - 4.8.2. 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). Current whistleblowing contacts, including the Vice Chair responsible for whistleblowing, are published on the Trust website https://www.plymouthcast.org.uk/board_of_directors and available from HR upon request.

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.** The Trust will normally acknowledge concerns within 5 working days and seek to arrange an initial meeting within 10 working days where possible. 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 7 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.
- 6.1.5.** Individuals raising concerns may seek support from a trade union representative, professional association, colleague, employee assistance programme, occupational health provider (through the Trust) or independent whistleblowing charity such as Protect.
- 6.1.6.** Where investigations are ongoing, the Trust will seek to provide periodic updates where appropriate.

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.** No action will be taken against individuals who raise concerns honestly and in good faith, even where concerns are unsubstantiated. Disciplinary action may be considered only where concerns are knowingly false, malicious or deliberately misleading.

8. Escalating concerns beyond the Trust

- 8.1.1.** The trust encourages staff to raise their concerns internally, in line with section 5 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-people-and-bodies#education>.
- 8.1.2.** The Protect advice line, linked to in section 4 of this policy, can also help staff when deciding whether to raise the concern to an external party.

9. Data Protection & Confidentiality

- 9.1.** Personal data relating to whistleblowing concerns will be processed in accordance with UK GDPR and the Data Protection Act 2018. Information will only be shared on a need-to-know basis and retained in accordance with the Trust's retention schedule and safeguarding obligations.

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
- 10.1.1.5. Data Protection Policy  Data Protection Policy
- 10.1.1.6. Safeguarding Policy  CAST Safeguarding Policy
- 10.1.1.7. Allegations Against Staff Procedure  Allegations Against Staff
- 10.1.1.8. Equal Opportunities Policy  Equal Opportunities
- 10.1.1.9. Staff Code of Conduct  Code of Conduct (Staff)



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.



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.

This page contains Plymouth CAST branding graphics and visual representations of the Trust's mission and values. The Trust's mission is to create outstanding schools where pupils flourish in safe, happy and stimulating environments inspired by the Gospel. The Trust's core values are collaboration, ambition, stewardship and trust.