



Policy for Confidential Reporting of Concerns (Whistleblowing)

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1. Statement of Intent

ONE (OWL North East) Academy Trust is committed to open and honest communication and ensuring the highest possible standards in integrity – we will always treat whistleblowing as a serious matter.

In line with the Trust's commitment to openness, probity and accountability, members of staff are encouraged to report concerns. This policy will work to ensure that, if an employee sees or suspects that something is wrong, they will raise this with the school or Trust. This is known as "blowing the whistle" – a phrase that is used throughout this policy and should be viewed as a positive action of speaking up.

This policy seeks to ensure that any member of staff who suspects malpractice knows how to raise concerns and what procedures are in place to deal with the concern.

Where this policy necessitates personal or special category data to be processed, it will be done so in accordance with the Trust's Data Protection Policy. This policy will not be confused with the procedure on dealing with harassment at work or the school's Grievance Policy and Disciplinary Policy and Procedure.

This policy will:

- Give confidence to members of staff when raising concerns about conduct or practice that is potentially illegal, corrupt, improper, unsafe or unethical, or which amounts to malpractice or is inconsistent with Trust's standards and policies.
- Provide members of staff with avenues to raise concerns.
- Ensure that members of staff receive a response to the concerns they have raised and feedback on any action taken.
- **Offer assurance that members of staff are protected from reprisals or victimisation for whistleblowing action undertaken in good faith and within the meaning of the Public Information Disclosures Act (see further information in Section 4 of this policy.**

Under this policy, any of the following can raise a concern:

- Employees of the Trust
- Voluntary workers working with the Trust
- Trainees, such as student teachers

The purpose of this policy is to promote and protect responsible whistleblowing where staff, contractors, suppliers or volunteers have concerns about malpractice in the school.

2. Roles and responsibilities

- **Staff, Contractors, Suppliers and Volunteers:** The policy applies to all employees and those contractors working for the schools on the school premises, for example, agency staff, builders and drivers. This will include volunteers or governors within schools.

- **Head teacher/managers:** The head teacher and other managers are responsible for investigating and responding to concerns raised.
- **Trust Board and Local Governing Bodies (LGBs):** Members of the governing bodies may also be involved in investigating and responding to concerns depending on the nature of the matter involved.
- **Trade unions:** The recognised trade unions in the school are ASCL, ATL, NAHT, NASUWT and NEU for teaching staff and GMB and Unison for support staff. All trade union officials, regardless of whether the union is recognised, may represent their members individually.
- **External agencies:** A range of external agencies can provide advice and support to individuals with a concern. In specific circumstances individuals can use external agencies to raise concerns outside the internal arrangements set out in this policy.

External Advice and Support is available from these organisations:

- [**Public Concern at Work \(PCaW\)**](#): This independent charity offers free and confidential advice for whistleblowers on 0207 404 6609.
- [**Trade Unions**](#): You can contact your relevant Trade Union for advice and support.
- [**Protect \(formerly Public Concern at Work\)**](#): For advice and support, you can also contact the whistleblowing charity Protect on their helpline at 0203 117 2520.
- The NSPCC runs a Whistleblowing advice line: 0800 028 0285.
- [**GOV.UK**](#): Provides general advice on whistleblowing for employees.

3. Legal Framework

This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:

- Public Interest Disclosure Act 1998
- Employment Rights Act 1996
- Gov.uk (2025) 'Academy trust handbook 2025'
- DfE (2023) 'Keeping children safe in education 2025'
- GOV.UK (2012) 'Whistleblowing for employees'
- Sir Robert Francis (2015) 'Freedom to speak up report'

This policy operates in conjunction with the following school policies:

- Disciplinary Policy and Procedure
- Records Management Policy

- Complaints Procedures Policy
- Data Protection Policy
- Grievance Policy

4. The Public Interest Disclosure Act

The Public Interest Disclosure Act 1998 (PIDA) protects employees who “blow the whistle” where the employee reasonably believes that the disclosure falls within the remit of the prescribed person or body, and that the information and any allegations are substantially true. Disclosures made under this procedure will be monitored for statistical purposes as required under the PIDA. The details of any disclosure will remain confidential.

The headteacher of each school is the first point of contact for whistleblowing queries. If the allegation is related to the headteacher, the concern will be raised with the chair of governors. Allegations can also be raised with the Trustee Board of the ONE Trust.

Any member of the school community or the general public is able to “blow the whistle”; however, the PIDA only protects employees. The ‘Non-employees’ section of this policy includes further details on how whistleblowing affects non-employees.

5. Definitions

“Whistleblowing” is when an employee reports suspected wrongdoing, or ‘qualifying disclosures’, at work to their employer.

As outlined by the PIDA, **“qualifying disclosures”** pertain to when any of the following takes place:

- A criminal offence has been committed, is likely to be committed or is being committed
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject
- A miscarriage of justice has occurred, is occurring or is likely to occur
- The health or safety of any individual has been, is being or is likely to be endangered
- The environment has been, is being or is likely to be damaged
- Information tending to show any matter falling within any of the preceding points has been, is being or is likely to be deliberately concealed

“In the public interest” means that an individual acted outside of their own personal interest – they acted for more than personal gain. It is not necessary for the disclosure to be of interest to the entire public. The following considerations are often used as a test to establish whether something is within the scope of public interest:

- The number of people in the group whose interests the disclosure served

- The nature of the interests and the extent by which individuals are affected by the wrongdoing disclosed
- The nature of the wrongdoing disclosed
- The identity of the alleged wrongdoer

“Blacklisting” refers to an individual who is being refused work because they are viewed as a whistleblower.

“Grievances” involve someone filing a complaint because they personally have been mistreated in some way – the person making the complaint will have a direct interest in the outcome. It is important to understand the difference between raising a grievance and blowing the whistle.

6. Policy statement

This policy reflects the Trust’s commitment to safeguarding children and young people, good practice, valuing staff and seeking continuous improvement in service delivery.

Employees are often the first to realise that there may be something wrong in their place of employment. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the school. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than to report what may just be a suspicion of malpractice.

The Governors and Trustees are committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees and others that we deal with who have concerns about any aspect of the schools’ work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.

This policy document makes it clear that you can do so without fear of victimisation, subsequent discrimination or disadvantage. The policy is intended to encourage and enable employees to raise concerns within the Trust rather than overlooking a problem or “blowing the whistle” outside.

7. Aims of this policy

This policy aims to:

- make you feel confident to raise concerns and to question and act upon concerns about practice;
- give you avenues to raise your concerns and receive feedback on any action taken;
- guarantees that you will receive a response to your concerns and ensures that you are aware of the process to follow if you are not satisfied;
- reassure you that you will be protected from possible reprisals or victimisation.

There are existing procedures in place if you have a grievance relating to your own employment or consider that you are being harassed (due to your race, sex, disability, sexual orientation, religion or belief or age) or if you are concerned about health and safety risks,

including risks to the public as well as to other employees. Indeed you are under a legal obligation to report to your supervisor or manager any work situation which you consider to represent:

- a danger to the health and safety of yourself, fellow employees or members of the public; or
- a shortcoming in the school's arrangements for health and safety.

If you are reluctant to raise such health and safety concerns with your supervisor or manager, or if you have raised them and are concerned about the response, then arrangements exist for you to raise the health and safety concerns with Newcastle City Council's Health and Safety Section and/or with a health and safety or trade union representative.

This policy is intended to cover concerns that fall outside the scope of other procedures or where it is considered that the relevant policy or procedure has not been followed, eg:

- practices which fail to safeguard children or young people including the sexual or physical abuse of service users;
- conduct which is an offence or a breach of law;
- disclosures related to miscarriages of justice;
- health and safety risks, including risks to the public as well as other employees;
- damage to the environment;
- the unauthorised use of public funds;
- fraud and corruption;
- any attempt to prevent disclosure of any of the above; or
- other conduct which gives you cause for concern.

Therefore any serious concerns that you have about any aspect of service provision or the conduct of staff or members of Newcastle City Council or others acting on behalf of the Trust and its schools or governing body or Trust Board can be reported under this policy. This may be about something that:

- makes you feel uncomfortable in terms of known standards, your experience or the standards you believe the governing body subscribe to; or
- is against the Trust Board's Standing Orders and policies; or
- falls below established standards of practice as outlined in the Code of Conduct; or
- amounts to improper conduct.

This policy supplements and does not replace the corporate or schools' complaints procedure, the grievance procedure and other procedures established to deal with aspects of harassment and with health and safety concerns.

8. Safeguards for complainants

8.1 Harassment or Victimisation

The Board of Trustees and LGBs are committed to good practice and high standards and aim to be supportive of their staff.

The Board of Trustees and LGBs recognise that the decision to report a concern can be a difficult one to make. However uncovering malpractice will be doing a service to the Trust and its schools. You will be doing your duty to your employer and those for whom you are providing a service.

The Board of Trustees and LGBs will fulfil their responsibilities to ensure that you are not harassed, victimised or otherwise disadvantaged when you raise a concern. Any employee engaging in any form of victimisation or harassment against you as a result of raising a concern may be subject to disciplinary action. Any governor who engages in any form of victimisation or harassment against you as a result of raising a concern may be subject to the appropriate sanction.

Allegations by an employee who is the subject of disciplinary investigations or proceedings concerning the conduct of those proceedings can only be raised through the disciplinary appeals procedures.

8.2 Confidentiality

All concerns will be treated in confidence wherever possible and every effort will be made to reserve your anonymity if you so wish. You may need however to come forward as a witness, but if you wish to be supported by a representative of your choice then this would be available to you.

8.3 Anonymous allegations

This policy encourages you to put your name to your allegation whenever possible.

Concerns expressed anonymously are much less powerful but they will be considered so far as is possible or practicable by the City Council/ Board of Trustees/LGBs.

8.4 Untrue allegations

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If however, you make an allegation maliciously or for personal gain, disciplinary action may be taken against you.

9. How to raise a concern

As a first step you should raise concerns with your line manager or head teacher. This depends however on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that your head teacher is involved you should approach your chair of local governors. Head teachers who have concerns about a member of staff should follow appropriate procedures in relation to specific areas of concern. If however, the concern of the head teacher is regarding any member of the local governing body advice should be sought from the chair of governors. The person receiving notification of concerns under this policy will inform the relevant person (Head Teacher, Chair of Governors, Chief Executive Officer or Chair of Trustees) that a confidential report has been received and provide a copy.

Concerns may be raised verbally or in writing. Reports should be sent to your immediate manager, the head teacher or the chair of governors.

If you wish to raise your concern with the Trust Board, then contact:

the Chief Executive Officer or Chair of Trustees via info@onetrustacademies.org.uk.

You can also contact the Trust on 0191 6052013 or write to:

ONE (Owl North East) Trust

c/o Throckley Primary School

Hexham Road

Newcastle upon Tyne

NE15 9DY

The earlier you express the concern, the easier it will be to take action.

You can get confidential, independent advice from the charity Public Concern at Work on 0207 404 6609. Their website is www.pcaw.co.uk.

You can invite your trade union or professional association representative or a fellow worker to be present during any meetings or interviews in connection with the concerns you have raised.

Concerns can be raised through your trade union or professional association who will advise and support you as appropriate.

10. How your concern will be dealt with

The Board of Trustees, LGBs, head teacher or manager will respond to your concerns, and it will be necessary to investigate your concerns but this is not the same as either accepting or rejecting them.

Within 3 working days of a concern being raised, you will be sent a written acknowledgement of the concern which has been raised.

Within 10 working days you will receive a further response:

- indicating how it is proposed to deal with the matter;
- giving an estimate of how long it will take to provide a final response;
- telling you whether any enquiries have been made;
- supplying you with information on staff support mechanisms.

Where appropriate, matters raised may:

- be investigated by the school/Trust Board/ local governing body, internal audit, or through the disciplinary process;
- be referred to the police or other statutory agencies;
- be referred to the external auditor.

In order to protect individuals and those about whom concerns are raised, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures (for example, child protection or discrimination issues) will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.

The amount of contact between you and the individual considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the investigating officers will seek further information from you.

Where any meeting is arranged, and this can be off-site if you so wish, you can be accompanied by a trade union or professional association representative or a fellow worker.

The Board of Trustees and LGBs will take steps to minimise any difficulties which you may experience as a result of realising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings the school will arrange for you to receive advice about the procedure.

The Board of Trustees and LGBs accept that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, you will be informed of the outcome of any investigation.

11. What the Trust asks of whistleblowers

The purpose of this policy is to enable individuals to raise concerns in confidence, without any fear of reprisal. It is important that whistleblowers:

- Do not talk about the concern outside the school unless it is to report the concern through the proper external channels, e.g. the LA.
- Declare any personal interest in the matter, as the policy is designed to be used in the interest of the public and not for individual matters.

12. How the matter can be taken further

This policy is intended to provide you with an avenue within the Trust and its schools to raise concerns. The Trust Board and governing body hope you will be satisfied with any action taken. If you remain dissatisfied, and you feel it is right to take the matter outside of the City Council, you may wish to take advice from your trade union, your local Citizens Advice Bureau or your legal advisor on the options that are available to you.

One possibility is that you may wish to rely on your rights under the Public Interest Disclosure Act 1998. This Act gives you protection from victimisation if you make certain disclosures of information in the public interest. The provisions are quite complex and include a list of prescribed persons outside of the school who can be contacted in certain circumstances. You should seek advice on the effect of the Act from the persons referred to above.

If you do take the matter outside of the governing body, you should ensure that you do not disclose information where you owe a duty of confidentiality to persons other than the Trust (e.g. service users) or where you would commit an offence by making disclosure.

If for any reason you do not wish to use the internal arrangements set out above, or require additional support and advice, a list of external agencies is given below. This is not exhaustive. A fuller list is available in the Public Interest Disclosure (Prescribed Persons) (Amendment) Order 2003 at www.legislation.hms.gov.uk.

Audit Commission for England and Wales 0845 0522646

www.audit-commission.gov.uk

Commission for Social Care Inspection 0845 0150120

www.csci.org.uk

Environment Agency	08708 506506	www.environment-agency.gov.uk
Food Standards Agency	0207 2768000	www.food.gov.uk
General Social Care Council	0207 3975100	www.gsccl.org.uk
Health and Safety Executive	0870 1545500	www.hse.gov.uk
Housing Corporation	0845 2307000	www.housingcorp.gov.uk
Information Commissioner	01625 545745	www.informationcommissioner.gov.uk
Occupational Pensions Regulatory Authority	01273 627600	www.opra.gov.uk
Public Concern at Work	0207 4046609	www.pcaw.co.uk
Standards Board for England	0845 0788181	www.standardsboard.co.uk

Advice about your rights is also available from:

Citizens Advice Bureau (Newcastle City)	0191 2320832
Newcastle Law Centre	0191 2304777

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	HR Services	14 August 2012	General update
0.1	ONE Trust	06 October 2023	Update for MAT conversion
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Signed by:		
Chair of Trustee Board	Helen Richardson	